



# 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 Solana Beach'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 Solana Beach. The City supports the arguments of the City of Solana Beach as outlined below.

1. The Objectives Identified In Govt. Code § 65584(D) Are Undermined By The Flawed Allocation Of Housing Units Because The Methodology Used To Determine The Allocation Of The Housing Units At Issue Incorporates A Flawed Mechanism To Distribute Those Housing Units Based On Transit Stations Located Within The Boundaries Of The Subject Jurisdictions.

The City of Lemon Grove and the City of Solana Beach are subject to this flawed mechanism. The City of Solana Beach states:

The City [of Solana Beach] identified that it is the smallest jurisdiction with a train station in San Diego County. While Solana Beach's train station provides Coaster and Amtrak service, the current RHNA methodology fails to recognize that, given Solana Beach's previously discussed small size, this train station serves a

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much wider geographic region and a greater commuter population than that of Solana Beach alone....Based on the Coaster Survey, more than 60% of the Coaster passengers that use the Station in Solana Beach are from jurisdictions outside Solana Beach city limits. This data supports the argument that the Solana Beach train station serves a much larger geographic area than just Solana Beach itself or within a 5-minute service area. The travel distance information collected demonstrates that between 48% and 74% of the passengers surveyed travel 2 miles or greater to get to their Coaster Station.

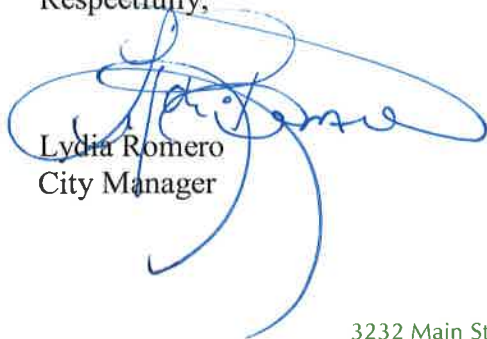
The City of Lemon Grove supports this statement and the argument that the housing units assigned to the train station should be distributed among neighboring jurisdictions. The City has two rail stations that have 17% - 22% of the area within a half mile located in adjacent jurisdictions. Thus, the rationale outlined by the City of Solana Beach also applies in the City of Lemon Grove.

2. SANDAG Failed To Adequately Consider Information Submitted And Available Related To Govt. Code § 65584.04(e)(8).

City of Lemon Grove supports Solana Beach's statement that "[f]ailure to include additional units for farmworkers is particularly troubling since the County of San Diego has indicated that it has the capacity to absorb additional units and has, in fact, planned for them." The County of San Diego has planned for more housing units and is actively updating its Community Plans to encourage housing in its villages. The previous Housing Element for the unincorporated areas of San Diego County planned for more than 20,000 housing units, but their current allocation is 6,700. This exhibits that SANDAG has not considered all information available to it and has improperly allocated housing units in the Draft Allocation.

In conclusion, the City of Lemon Grove agrees with the City of Solana Beach that SANDAG has not properly considered all the relevant information available in calculating the Draft Allocation and its methodology is flawed. The City respectfully submits these comments on the appeal letter of the City of Solana Beach.

Respectfully,



Lydia Romero  
City Manager

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