

**SANDAG**

## RHNA Appeals Hearing

Board of Directors | June 26, 2020 | Item 13

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## City of Coronado's Appeal

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## Coronado Appeal – Factor 1

*Section 65584.04(e)(1), Jobs-Housing Relationship*

### City's Appeal (#1 of 2)

- 1) SANDAG did not adequately consider information on military jobs or military housing

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- 1) TWG, RHNA Subcommittee, and Board discussed military jobs and military housing at length at multiple meetings. The Board approved a methodology that does not include a housed military adjustment.

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## Coronado Appeal – Factor 1

*Section 65584.04(e)(1), Jobs-Housing Relationship*

### City's Appeal (#2 of 2)

- 2) Jobs on NASNI should be split between the City and the City of San Diego

**SANDAG Staff Draft Determination:** ACCEPT

### SANDAG Staff Draft Findings:

- 2) Job counts to be realigned based on data from the Defense Manpower Data Center for the following installations:
  - Silver Strand Training Complex (SSTC) in Coronado,
  - Naval Outlying Landing Field (NOLF) in Imperial Beach, and
  - Naval Base San Diego at 32nd Street, the portion that is located in San Diego

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# Military MGRAs



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# NASNI Land Area



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## Proposed Revision to Jobs Count

Jurisdiction	Total Jobs	Revised Jobs	Difference
Carlsbad	76,779	76,779	-
Chula Vista	72,403	72,403	-
Coronado	27,594	25,149	(2,445)
Del Mar	4,484	4,484	-
El Cajon	45,468	45,468	-
Encinitas	27,871	27,871	-
Escondido	55,059	55,059	-
Imperial Beach	4,936	3,666	(1,270)
La Mesa	29,773	29,773	-
Lemon Grove	7,492	7,492	-
National City	37,497	37,497	-
Oceanside	45,178	45,178	-
Poway	36,349	36,349	-
San Diego	921,054	924,967	3,913
San Marcos	40,964	40,964	-
Santee	18,634	18,634	-
Solana Beach	9,151	9,151	-
Unincorporated	154,686	154,686	-
Vista	40,629	40,629	-
<b>Region</b>	<b>1,656,001</b>	<b>1,656,199</b>	<b>198</b>

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## Coronado

### Draft Allocation

	Very Low	Low	Moderate	Above Moderate	Total Allocation
Coronado	343	185	174	299	1,001

### Proposed Revision

	Very Low	Low	Moderate	Above Moderate	Total Allocation
Coronado	312	169	159	272	912

### Difference

	Very Low	Low	Moderate	Above Moderate	Total Allocation
Coronado	(31)	(16)	(15)	(27)	(89)

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**SANDAG**

## San Diego

Draft Allocation

	Very Low	Low	Moderate	Above Moderate	Total Allocation
San Diego	27,510	17,311	19,297	43,783	107,901

Proposed Revision

	Very Low	Low	Moderate	Above Moderate	Total Allocation
San Diego	27,549	17,331	19,319	43,837	108,036

Difference

	Very Low	Low	Moderate	Above Moderate	Total Allocation
San Diego	39	20	22	54	135

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## Coronado Appeal – Factor 2

*Section 65584.04(e)(2), Opportunities and Constraints to Development*

### City's Appeal

The draft allocation fails to consider unique constraints to development and would require the City to violate the Coastal Act

**SANDAG Staff Draft Determination: REJECT**

**SANDAG Staff Draft Findings:**

- Per Section 65584.04(e)(2)(B), SANDAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality”
- Jurisdictions wholly or partly in the coastal zone must work with the Coastal Commission when updating the housing element and local coastal plan.

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## Coronado Appeal – Factor 9

*Section 65584.04(e)(9), Housing Needs of Colleges and Universities*

### City's Appeal

State law requires that SANDAG consider the housing needs of colleges and universities “as a separate factor or adjustment in the allocations” (City Appeal, p. 5)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The major universities and community colleges in the San Diego region are located in urban areas served by the existing transportation network and the methodology encourages housing development near existing transit facilities.
- The major universities and colleges in the region are also key employers. Therefore, jobs associated with those institutions are specifically considered in the methodology through the jobs component.
- Ultimately, the City does not propose a specific revision to the draft allocation, or submit supporting documentation or alternative data

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## Coronado Appeal – Factor 12, now 13

*Section 65584.04(e)(13), Other Factors and Furtherance of Statutory Objectives*

### City's Appeal (#1-2 of 4)

- 1) “SANDAG could have adopted [a methodology] over any HCD objection”
- 2) “[t]he factors that SANDAG applied under [Factor 13] successfully in past cycles should be used to revise the draft allocation to bring it into line with RHNA’s statutory objectives” (City’s Appeal, p. 6)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- 1) Per Section 65584.05(g) HCD “may revise the determination of the council of governments if necessary to obtain” consistency with the existing and projected housing need for the region
- 2) Between the 5<sup>th</sup> Cycle and 6<sup>th</sup> Cycle, Factor 13 was revised. “Other factors” must further state objectives. The City does not provide documentation of how incorporating unidentified, prior cycle factors is necessary to further state objectives.

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## Coronado Appeal – Factor 12, now 13

*Section 65584.04(e)(13), Other Factors and Furtherance of Statutory Objectives*

### City's Appeal (#3 of 4)

- 3) SANDAG did not adequately consider information on “the desire of other member agencies to absorb additional units” (City's Appeal, p. 6)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The Board expressed a desire to take a different approach than the methodology used in the 5th Cycle by not relying on existing housing capacities as a starting point
- The RHNA Subcommittee and Board discussed the concept of trading housing units and noted that it would not further state objectives
- The City does not provide documentation of how trading housing units is necessary to further state objectives.

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## Coronado Appeal – Factor 12, now 13

*Section 65584.04(e)(13), Other Factors and Furtherance of Statutory Objectives*

### City's Appeal (#4 of 4)

- 4) The City supports the small cities adjustment as proposed by the City of Solana Beach (Attachment to City's Appeal)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The Board considered and rejected a small cities adjustment in the development of the methodology
- HCD does not support an adjustment that is not based on the objectives in state law
- The City does not demonstrate how this approach would be necessary to further the state objectives

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## Coronado Appeal – Objective 1

*Section 65584(d)(1), Increasing the Housing Supply*

### City's Appeal

The draft allocation “does not assign housing units in an equitable manner” and the City has a disproportional increase in housing units in the 6<sup>th</sup> Cycle as compared to the 5<sup>th</sup> Cycle (City Appeal, p. 6)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The increase in the City's allocation of housing units in the 6th Cycle reflects the Board's desire to take a different approach from the methodology used for the 5th Cycle
- The final methodology distributes housing units in all four income categories furthering the statutory objectives as described in the draft determination and proposed Final RHNA Plan

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## Coronado Appeal – Objective 3

*Section 65584(d)(3), Intra-regional Jobs-Housing Relationship*

### City's Appeal

“Most active duty military personnel already have government funded housing” (City Appeal, p. 6)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The City has not demonstrated how excluding active duty military jobs from the total jobs data is necessary to further state objectives.
- Based on data available to SANDAG, if one active duty military job were attributed to one on-base housing unit in the City, this still leaves more than half (53%) of the active duty military personnel without available housing on-base.
- The City has not provided alternate data.

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## Coronado Appeal

*Section 65584.05(b)(3) Significant and Unforeseen Change in Circumstances*

### City's Appeal

SANDAG should consider the new California Department of Finance (DOF) population projection released in January 2020

**SANDAG Staff Proposed Determination: REJECT**

### SANDAG Staff Proposed Findings:

- Revision of a final RHNA Determination is not provided for in the statutory framework
- The RHNA Determination is based on data available during the consultation process and is not revised for either increased or decreased population estimates subsequently released

## Coronado

### Draft Allocation

	Very Low	Low	Moderate	Above Moderate	Total Allocation
Coronado	343	185	174	299	1,001

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## Imperial Beach Appeal – Objective 1

*Section 65584(d)(1), Increasing the Housing Supply*

### City's Appeal

95% of housing units allocated based on a jurisdiction's share of major transit stops are allocated south of Interstate 8 (I-8), which "exacerbates the concentration of low-income housing in communities that currently already have more affordable housing than average" (City's Appeal, p. 1)

**SANDAG Staff Draft Determination: REJECT**

**SANDAG Staff Draft Findings:**

- Housing units allocated based on a jurisdiction's share of major transit stops only account for 16% of the entire regional housing need.
- Of housing units allocated based on entire transit component, about 57% are allocated to the cities of Chula Vista, Imperial Beach, National City, and portions of the City of San Diego south of I-8
- 26% of the City's total housing units are in the very low and low income range compared to the regional proportion of about 40%

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## Imperial Beach Appeal – Objective 2

*Section 65584(d)(2), Promote Infill Development*

### City's Appeal

“The Major job centers in San Diego County [are] located north of Interstate 8” (City’s Appeal, p. 2), therefore the vehicle miles traveled (VMT) by residents south of I-8 will be disproportionately increased by the draft allocation.

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The methodology allocates housing units based on the share of jobs in the region; the City receives housing units from the jobs component based on jobs within its jurisdiction
- The methodology contemplates housing production near transit and jobs to encourage efficient development patterns and reduce greenhouse gas (GHG) emissions
- The methodology aligns with CARB’s policy goals

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## Imperial Beach Appeal – Objective 3

*Section 65584(d)(3), Intra-regional Jobs-Housing Relationship*

### City's Appeal

- 1) The draft allocation disproportionately allocates housing units because major job centers are located in other jurisdictions
- 2) The major transit stops subcomponent results in a disproportional allocation

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- 1) The methodology allocates housing units based on the share of jobs in the region; the City receives housing units from the jobs component based on jobs within its jurisdiction
- 2) Of housing units allocated based on entire transit component, about 57% are allocated to the cities of Chula Vista, Imperial Beach, National City, and portions of the City of San Diego south of I-8

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## Imperial Beach Appeal – Objective 4

*Section 65584(d)(4), Allocation based on Income Categories*

### City's Appeal

- 1) The major transit stops subcomponent results in a disproportional allocation, which “negates meaningful impacts” (City’s Appeal, p. 2)
- 2) The City’s allocation has significantly increased from the 5<sup>th</sup> Cycle

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The increase in housing units in the 6th Cycle reflects the Board's desire to take a different approach from the methodology used for the 5th Cycle
- State law does not require the allocation of fewer total housing units when a jurisdiction has a high share of households in a particular income category; it requires that a lower proportion of housing need be allocated to that income category.

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## Imperial Beach Appeal – Objective 5

*Section 65584(d)(5), Affirmatively Furthering Fair Housing*

### City's Appeal

The draft allocation is contrary to advancing fair housing principles based on the resulting allocation from the major transit stops subcomponent.

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Housing units allocated based on a jurisdiction’s share of major transit stops only account for 16% of the entire regional housing need.
- The draft allocation assists in overcoming patterns of discrimination and transforming racially and ethnically concentrated areas of poverty into areas of opportunity by allocating a higher proportion of low-income housing units to jurisdictions with a lower share of low-income households, which tend to be jurisdictions with a high concentration of resource-rich areas.

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## Imperial Beach Appeal – Factor 1

*Section 65584.04(e)(1), Jobs-Housing Relationship*

### City's Appeal (#1 of 3)

- 1) The use of major transit stops does not “procure [sic] development opportunities because it is easily moved” (City's Appeal, p. 3)

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- Transit definitions were discussed at length during multiple meetings of the RHNA Subcommittee, TWG and Board, and were therefore adequately considered
- State law incentivizes development near a major transit stop by providing a qualifying project with the option for CEQA streamlining; projects near major transit stops are encouraged as infill opportunities

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## Imperial Beach Appeal – Factor 1

*Section 65584.04(e)(1), Jobs-Housing Relationship*

### City's Appeal (#2 of 3)

- 2) The City requests to assign affordable units to all bus stops in the region equally.

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- It is unclear how assigning affordable units based on the total number of bus stops within a jurisdiction would address the City's concern that bus stops are “easily moved, and may be moved without City consent” (City's Appeal, p. 3).
- The City has not shown how allocating housing units based on the total number of all bus stops – as opposed to major transit stops - is necessary to further the statutory objectives.

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## Imperial Beach Appeal – Factor 1

*Section 65584.04(e)(1), Jobs-Housing Relationship*

### City's Appeal (#3 of 3)

- 3) The draft allocation “is not balanced relative to existing and projected jobs and housing” (City’s Appeal, p. 3); more emphasis should have been placed on the jobs component

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- The relative weighting of jobs and transit was discussed at length during multiple meetings of the RHNA Subcommittee, TWG and Board, and was therefore adequately considered

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## Imperial Beach Appeal – Factor 2

*Section 65584.04(e)(2), Opportunities and Constraints to Development*

### City's Appeal (#1 of 2)

- 1) The draft allocation fails to consider that the City is “built out”

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- Per Section 65584.04(e)(2)(B), SANDAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality”
- Projects near major transit stops are encouraged as infill opportunities; State law incentivizes development near a major transit stop by providing a qualifying project with the option for CEQA streamlining

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## Imperial Beach Appeal – Factor 2

*Section 65584.04(e)(2), Opportunities and Constraints to Development*

### City's Appeal (#2 of 2)

- 2) “Based upon development trends and economics, the ability to realize the allocated units appears unrealistic” and that “a funding mechanism to assist achievement of the housing allocation is needed as a way to incentivize housing development” (City’s Appeal, p. 4).

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Neither development trends and economics nor financial incentives are considerations in allocating the regional housing need under state law.
- State legislation in 2018 removed “[t]he market demand for housing” as a factor for consideration
- Beginning in 2018, HCD introduced state funding programs to assist local jurisdictions with housing production in recognition of challenges arising from the statewide housing crisis.

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## Imperial Beach Appeal – Factor 3

*Section 65584.04(e)(3), Public Transportation & Existing Transportation Infrastructure*

### City's Appeal (#1 of 3)

- 1) The impact of transit is disproportional when compressed into 4 cities

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The transit component allocated housing units to 16 of 19 jurisdictions
- The Board rejected a motion to replace the “major transit stops” definition with the “high frequency transit” definition
- The City has not demonstrated that the requested revision to use another transit definition is necessary to further the intent of the statutory objectives.

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## Imperial Beach Appeal – Factor 3

*Section 65584.04(e)(3), Public Transportation & Existing Transportation Infrastructure*

### City's Appeal (#2 of 3)

- 2) Placement of bus stops “is subject to change at any time without the approval of SANDAG or a local municipality” (City’s Appeal, p. 4).

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- For major service changes, including the significant realignment of a route, changes in scheduled headways, and subarea restructuring, MTS requires a public hearing and a Title VI analysis prior to the MTS Board of Directors making a final implementation decision. (MTS Policies and Procedures, No. 42)
- The City is a member of the MTS Board of Directors, where these decisions would take place (MTS Policies and Procedures, No. 22)

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## Imperial Beach Appeal – Factor 3

*Section 65584.04(e)(3), Public Transportation & Existing Transportation Infrastructure*

### City's Appeal (#3 of 3)

- 3) Affordable Housing and Sustainable Communities grant program guidelines states a preference for high quality transit “such as dedicated bus lanes, bus rapid transit, and rail” (City’s Appeal, p. 4).

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Rail and *Rapid* stations are in fact prioritized over the major transit stops subcomponent: only 25% of the transit component is based on major transit stops, while 75% is based on rail and *Rapid* stations in the region.

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## Imperial Beach Appeal – Factor 11, now 12

*Section 65584.04(e)(12), The Region's GHG Targets*

### City's Appeal (#1 of 2)

- 1) SANDAG did not adequately consider the City's lack of high-quality transit, such as rail, bus rapid transit, and dedicated bus lanes, in determining the draft allocation.

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Rail and *Rapid* stations are in fact prioritized over the major transit stops subcomponent: only 25% of the transit component is based on major transit stops, while 75% is based on rail and *Rapid* stations in the region.
- The City does not have rail and *Rapid* stations and receives zero housing units for that subcomponent

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## Imperial Beach Appeal – Factor 11, now 12

*Section 65584.04(e)(12), The Region's GHG Targets*

### City's Appeal (#2 of 2)

- 2) Because major job centers are located outside of Imperial Beach, VMT will increase due to the trips generated by new housing units.

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The draft allocation encourages housing growth near transit to provide residents with improved access to transit options, lowering VMT, and reducing GHG emissions

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# Imperial Beach Appeal

*Section 65584.05(b)(3) Significant and Unforeseen Change in Circumstances*

## City's Appeal

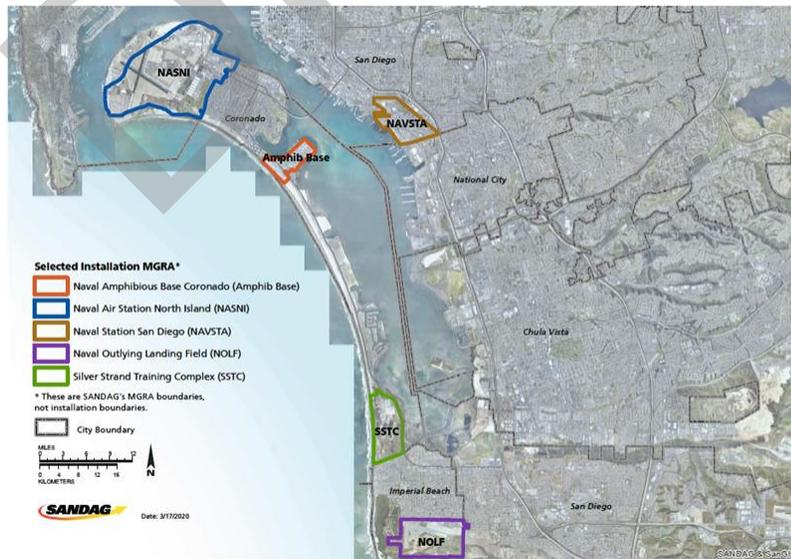
SANDAG should consider the new California Department of Finance (DOF) population projection release in January 2020

**SANDAG Staff Draft Determination: REJECT**

## SANDAG Staff Draft Findings:

- Revision of a final RHNA Determination is not provided for in the statutory framework
- The RHNA Determination is based on data available during the consultation process and is not revised for either increased or decreased population estimates subsequently released

# Military MGRAs



## Proposed Revision to Jobs Count

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Lemon Grove	7,492	7,492	-
National City	37,497	37,497	-
Oceanside	45,178	45,178	-
Poway	36,349	36,349	-
San Diego	921,054	924,967	3,913
San Marcos	40,964	40,964	-
Santee	18,634	18,634	-
Solana Beach	9,151	9,151	-
Unincorporated	154,686	154,686	-
Vista	40,629	40,629	-
<b>Region</b>	<b>1,656,001</b>	<b>1,656,199</b>	<b>198</b>

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## City of Imperial Beach

### Draft Allocation

	Very Low	Low	Moderate	Above Moderate	Total Allocation
Imperial Beach	233	127	190	825	1,375

### Proposed Revision

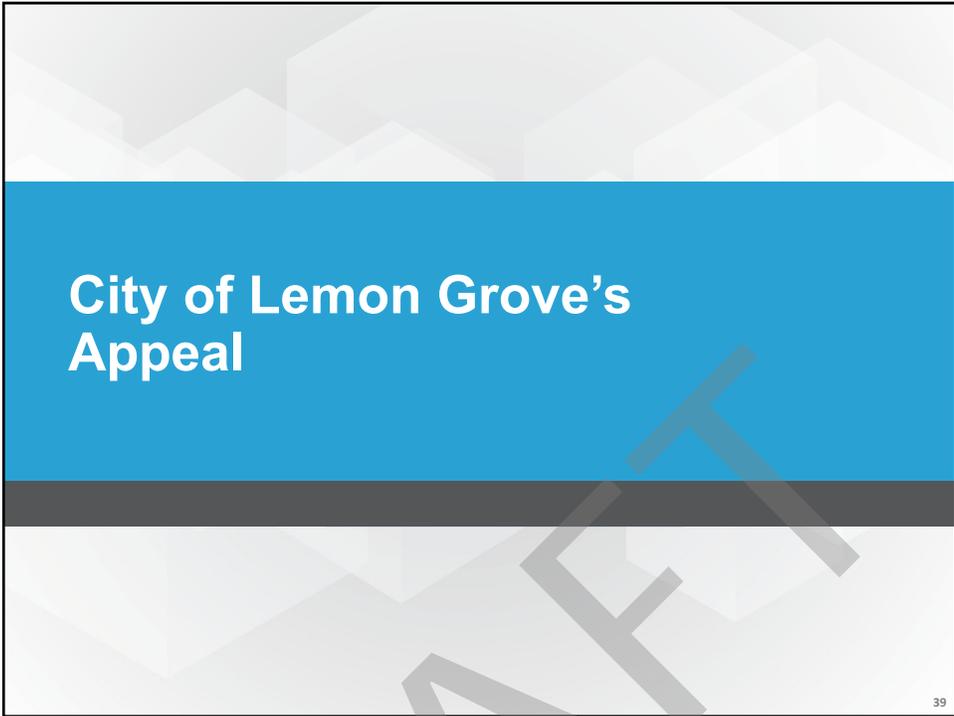
	Very Low	Low	Moderate	Above Moderate	Total Allocation
Imperial Beach	225	123	183	798	1,329

### Difference

	Very Low	Low	Moderate	Above Moderate	Total Allocation
Imperial Beach	(8)	(4)	(7)	(27)	(46)

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**SANDAG**

## Lemon Grove Appeal

*Section 65584(d) RHNA Objectives*

### City's Appeal

The draft allocation undermines the RHNA objectives by disproportionately allocating housing units to jurisdictions based on transit stations in its boundaries. The City requests that SANDAG modify the allocation based on each jurisdiction's land area falling within a half-mile of a rail station.

**SANDAG Staff Draft Determination: REJECT**

**SANDAG Staff Draft Findings:**

- The area surrounding transit and rail stations, and the related conversation about land availability and capacity, was discussed at several public meetings of the TWG, RHNA Subcommittee and the Board, and was therefore adequately considered
- Per Section 65584.04(e)(2)(B), SANDAG "may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality"
- The emphasis on rail and *Rapid* stations in the methodology is to encourage future growth located near transit. This aligns with state climate goals

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## Lemon Grove Appeal – Objective 5

*Section 65584(d)(5), Affirmatively Further Fair Housing*

### City's Appeal (#1 of 2)

The draft allocation will “only serve to displace lower income households” that rely on transit, and emphasizing transit “compounds segregated living patterns” by allocating low income housing in existing low income communities near transit (City's Appeal, p. 8)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The City does not present data or other evidence to support these contentions
- The draft allocation assists in overcoming patterns of discrimination and transforming racially and ethnically concentrated areas of poverty into areas of opportunity by allocating a higher proportion of low-income housing units to jurisdictions with a lower share of low-income households, which tend to be jurisdictions with a high concentration of resource-rich areas.

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## Lemon Grove Appeal

*Section 65584(d)(5), Affirmatively Further Fair Housing*

### City's Appeal (#2 of 2)

The City “lacks sufficient vacant land to accommodate the Draft Allocation” which will serve to displace lower income households without generating replacement housing (City's Appeal, p. 8).

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Per Section 65584.04(e)(2)(B), SANDAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality”
- Projects near major transit stops are encouraged as infill opportunities; State law incentivizes development near a major transit stop by providing a qualifying project with the option for CEQA streamlining

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## Lemon Grove Appeal

*Section 65584.05(b)(3) Significant and Unforeseen Change in Circumstances*

### City's Appeal

SANDAG should consider the new California Department of Finance (DOF) population projection release in January 2020

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Revision of a final RHNA Determination is not provided for in the statutory framework
- The RHNA Determination is based on data available during the consultation process and is not revised for either increased or decreased population estimates subsequently released

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## City of Solana Beach's Appeal

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## Solana Beach Appeal – Factor 1

*Section 65584.04(e)(1), Jobs-Housing Relationship*

### City's Appeal

"The employment data SANDAG used is inconsistent with data available by and from other jurisdictions to verify its accuracy" and "[f]ailure to allow each jurisdiction to understand how these numbers were generated or selected was arbitrary and without adequate support in facts." (City's Appeal, p. 2).

**SANDAG Staff Draft Determination:** **Reject**

### SANDAG Staff Draft Findings:

- SANDAG performed extensive stakeholder outreach, including presentations to city councils upon request, in defining the data sources available during the development of the methodology to ensure adequate opportunity for jurisdictions to comment.
- The City has neither provided alternate data or proposed a specific revision to the draft allocation based on this factor

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## Solana Beach Appeal – Factor 2

*Section 65584.04(e)(2), Opportunities and Constraints to Development*

### City's Appeal (#1 of 2)

The draft allocation fails to adequately account for the amount of land available for development in a jurisdiction.

**SANDAG Staff Draft Determination:** **REJECT**

### SANDAG Staff Draft Findings:

- Per Section 65584.04(e)(2)(B), SANDAG "may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality"
- HCD noted in its letter dated November 1, 2019, that "[p]articularly relevant to supporting infill development and climate change goals is the fact that this methodology does not consider land capacity or vacant land as a determinant of RHNA, and instead focuses on where housing is needed to encourage transit ridership and reduced commutes."

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## Solana Beach Appeal – Factor 2

*Section 65584.04(e)(2), Opportunities and Constraints to Development*

### City's Appeal (#2 of 2)

The draft allocation does not adequately consider the City's small jurisdictional size or restrictions imposed by the Coastal Act

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Per Section 65584.04(e)(2)(B), SANDAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality”
- Jurisdictions wholly or partly in the coastal zone must work with the Coastal Commission when updating the housing element in its general plan.
- The City does not propose a specific revision to the draft allocation based on its Local Coastal Program

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## Solana Beach – Factor 3

*Section 65584.04(e)(3), Public Transportation and Existing Transportation Infrastructure*

### City's Appeal

SANDAG did not adequately consider a broader population and geographic area served by rail stations and this “justifies a modification to the RHNA allocation for a small jurisdiction with a train station that services a much broader area.” (City's Appeal, p. 4)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Land area around rail stations was discussed at multiple meetings of the RHNA Subcommittee, TWG and Board, and was therefore adequately considered
- Per Section 65584.04(e)(2)(B), SANDAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality”
- The City does not propose a specific revision to the draft allocation based on this factor

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## Solana Beach Appeal – Factor 9

*Section 65584.04(e)(9), Housing Needs of Colleges and Universities*

### City's Appeal

SANDAG did not adequately consider this factor and assumed that transit “would somehow automatically cover the housing needs of campuses.” (City's Appeal, p. 5)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The major universities and colleges in the region are also key employers. Therefore, jobs associated with those institutions are specifically considered in the methodology through the jobs component.
- The major universities and community colleges in the San Diego region are in fact located in urban areas served by the existing transportation network.
- The City does not propose a specific revision to the draft allocation, or submit supporting documentation or alternative data

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## Solana Beach – Factor 8

*Section 65584.04(e)(8), Housing Needs of Farmworkers*

### City's Appeal

The housing needs of farmworkers were “completely ignored.” (City's Appeal, p. 5)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The final methodology accounts for all jobs in the region, farmworker jobs included, in allocating the regional housing needs.
- The City does not propose a specific revision to the draft allocation based on this factor

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## Solana Beach Appeal – Factor 11, now 12

*Section 65584.04(e)(12), The Region's GHG Targets*

### City's Appeal

Information related to the region's GHG emissions targets provided by the California Air Resource's Board (CARB) has not been adequately considered

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Because the draft allocation encourages the development of housing near jobs and transit, it will provide the region's residents with opportunities to live where they work and readily access transit, which can facilitate shorter commutes, reduce vehicle miles traveled, and increase trip-taking by transit or alternative modes.

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## Solana Beach Appeal – Objective 1

*Section 65584(d)(1), Increasing the Housing Supply*

### City's Appeal

The methodology does not consider "financial viability" of land and "financial assistance is severely lacking to assist cities in offsetting development costs." (City Appeal, p. 7)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Neither financial viability of land nor financial assistance are factors for consideration in allocating the regional housing need under state law. In fact, in 2018 state legislation removed "[t]he market demand for housing" as a factor for consideration
- Beginning in 2018, HCD introduced state funding programs to assist local jurisdictions with housing production in recognition of challenges arising from the statewide housing crisis.

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## Solana Beach Appeal – Objective 2

*Section 65584(d)(2), Promote Infill Development*

### City's Appeal

The draft allocation would require violation of the Coastal Act and fails to promote infill development because “[u]nits should be allocated to jurisdictions that are not overly built out.” (City’s Appeal, p. 8)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- Per Section 65584.04(e)(2)(B), SANDAG “may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality”
- Jurisdictions wholly or partly in the coastal zone must work with the Coastal Commission when updating the housing element in its general plan.
- An allocation based on transit and jobs encourages efficient development patterns and reduces GHG emissions and will lead to more infill development while protecting natural resources and open space

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## Solana Beach Appeal – Objective 3

*Section 65584(d)(3), Intra-regional Jobs-Housing Relationship*

### City's Appeal (#1 of 4)

- 1) “The methodology fails to include the number of low-wage jobs in a jurisdiction and compare it to the ratio of low-wage housing.” (City's Appeal, p. 9)

**SANDAG Staff Draft Determination: REJECT**

### SANDAG Staff Draft Findings:

- The number of low-wage jobs far exceeds the number of existing housing units affordable to low-wage workers in every jurisdiction in the region. Therefore, allocation of low and very low-income housing units to all jurisdictions in the region would improve the balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers.

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## Solana Beach Appeal – Objective 3

### *Section 65584(d)(3), Intra-regional Jobs-Housing Relationship*

#### City's Appeal (#2 of 4)

- 2) The percentages given as weighting to the jobs and transit components “appear to have been taken out of thin air.” (City’s Appeal, p. 9)

**SANDAG Staff Draft Determination:** REJECT

#### SANDAG Staff Draft Findings:

- Weighting of the jobs and transit components were discussed at length during multiple meetings of the RHNA Subcommittee, TWG, and Board and have been adequately considered
- The City does not propose a specific revision to the draft allocation based on this factor

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## Solana Beach Appeal – Objective 3

### *Section 65584(d)(3), Intra-regional Jobs-Housing Relationship*

#### City's Appeal (#3 of 4)

- 3) The percentages for the transit subcomponents “appear to have been taken out of thin air” and the methodology should assign housing units based on all bus stops in the region, rather than major transit stops. (City’s Appeal, p. 9)

**SANDAG Staff Draft Determination:** REJECT

#### SANDAG Staff Draft Findings:

- Weighting of the transit subcomponents were discussed at length during multiple meetings of the RHNA Subcommittee, TWG, and Board
- Rail and *Rapid* stations were more heavily weighted to reflect the significant investment the region has made to build and improve rail lines and *Rapid* routes, as well as the permanency of rail lines and *Rapid* routes relative to local bus service
- State law incentivizes development near a major transit stop by providing a qualifying project with the option for CEQA streamlining. Projects near major transit stops are specifically encouraged as infill opportunities.

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## Solana Beach Appeal – Objective 3

*Section 65584(d)(3), Intraregional Jobs-Housing Relationship*

### City's Appeal (#4 of 4)

- 4) A “better” regional balance could be achieved by allocating units in the transit component based on all bus stops, or alternatively, by 50% of the units being allocated to rail and *Rapid* and 50% to major transit stops. (City's Appeal, p. 9)

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- The City does not demonstrate how either approach would be necessary to further the state objectives

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## City of Solana Beach Appeal

*Section 65584.05(b)(3) Significant and Unforeseen Change in Circumstances*

### City's Appeal

SANDAG should consider the new California Department of Finance (DOF) population projection release in January 2020

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- Revision of a final RHNA Determination is not provided for in the statutory framework
- The RHNA Determination is based on data available during the consultation process and is not revised for either increased or decreased population estimates subsequently released

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## Solana Beach Appeal

### City's Appeal

Modify the draft allocation by reducing the allocation by 55% for small jurisdictions and reallocating those units to those jurisdictions whose proposed allocation is less than the Cycle 5 RHNA allocation

**SANDAG Staff Draft Determination:** REJECT

### SANDAG Staff Draft Findings:

- The Board considered and rejected a small cities adjustment
- HCD does not support an adjustment that is not based on the objectives in state law
- The City does not demonstrate how this approach would be necessary to further the state objectives

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