



CITY OF CORONADO

OFFICE OF THE MAYOR

RICHARD BAILEY

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January 6, 2020

SANDAG Board of Directors
Attn: Mr. Seth Litchney, Regional Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: Appeal of SANDAG Draft RHNA Allocation

Dear Honorable Board Members:

On behalf of the City of Coronado City Council, and in accordance with Government Code Section 65584.05, the City of Coronado (City) submits the following appeal for a revision of the share of the regional housing need proposed to be allocated to the City and other local governments under the Regional Housing Needs Assessment (RHNA) methodology adopted for the 6th cycle. A revision to the draft allocation is necessary to further the intent of the statutorily mandated objectives listed Government Code Section 65584(d). In addition, this appeal is consistent with, and not to the detriment of, the development pattern in the applicable sustainable communities strategy developed pursuant to Government Code Section 65080(b)(2) as explained below. This appeal is brought on the grounds that:

- (1) SANDAG failed to adequately consider the information submitted pursuant to Government Code Section 65584.04(b); and
- (2) SANDAG failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Government Code Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed Government Code Section 65584(d).

The Draft Allocation Failed to Adequately Consider the Information Coronado Submitted

Pursuant to Government Code Section 65584.04, SANDAG was required to include the following statutory factors to develop the methodology to allocate regional housing needs:

- (1) Statutory Factor under Government Code Section 65584.04(e)(1): Each member jurisdiction's existing and projected jobs and housing relationship. This shall include an estimate based on readily available data on the number of low-wage jobs within the jurisdiction and how many housing units within the jurisdiction are affordable to low-wage workers as well as an estimate based on readily available data, of projected job growth and projected household growth by income level within each member jurisdiction during the planning period.



Information Not Considered: The proposed allocation fails to meet this statutory factor because it accounts for active duty military jobs but ignores military housing provided by the U.S. Federal Government. Most active duty military personnel live in no-cost (i.e., affordable) on-base housing, aboard ships, or in government subsidized off-base military housing. SANDAG's proposed allocation to Coronado, and other cities with active duty military, is fatally flawed because it effectively requires member agencies with military installations to plan for additional housing for employees who are already housed in either no-cost or low-cost housing provided by the federal government.

SANDAG staff recognized this flaw during preparation of the draft RHNA formula and recommended removing active duty military jobs that had government provided housing. Inexplicably, the SANDAG Board of Directors (Board) voted against this rational amendment resulting in an unbalanced and defective proposed allocation to the City. If the Board decides to keep active duty military jobs in the allocation, they must also account for existing affordable housing already provided for active duty military personnel. Either way, a revision to the draft allocation to Coronado is necessary to further the intent of the statutory factor to link jobs to housing.

The duplicitous treatment of military jobs and no-cost and low-cost military housing also casts doubt on the veracity of SANDAG's proposed equity adjustment. SANDAG's formula of including all military jobs while excluding military housing produces a 2.88 total jobs to housing ratio for Coronado which is the highest in the region and over two times higher than the regional average of 1.39. Furthermore, excluding military households living in federally subsidized housing likely results in an undercount of existing very low-, low-, and moderate-income households and an inflated equity adjustment for Coronado.

In addition, 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 (Attachments 1 and 3), 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).

It also remains unclear whether SANDAG's military jobs figures are accurate. Despite requests, SANDAG has not explained whether the 12,715 active duty military jobs it assigns to Coronado is based on the 12,741 sponsors cited in the 2016 Demographics Profile of the Military Community report or some other source. SANDAG has also not verified whether the reported 12,715 jobs figure includes those occupied by personnel stationed at any of the Naval Base Coronado installations located outside City limits (e.g., San Clemente Island; Camp Michael Monsoor Mountain Warfare Training Center, La Posta; Camp Morena, La Posta and the Remote Training Site, Warner Springs, etc.).

This is particularly troubling since the information was readily available from the Department of Defense. On July 26, 2019, Joe Stuyvesant from the Navy came before the Board and asked



questions about what SANDAG was counting as housed military, offering to sit with SANDAG staff and review the information “in short because my numbers don’t match with your numbers; to make sure we have it right; good information.”¹ It does not appear that SANDAG staff ever took the Navy up on their offer to get accurate information. Mayor Salas voiced concerns “that I never did get a satisfactory answer during...the committee hearings about what percentage of the military actually live on base....”² Given the critical nature of the job figures to the draft allocation, the Board of Directors must verify their accuracy with the Navy and provide a public accounting prior to hearing the appeals.

- (2) Statutory Factor under Government Code Section 65584.04(e)(2): The opportunities and constraints to development of additional housing in each member jurisdiction.

Information Not Considered: SANDAG’s proposed allocation fails to adequately account for Coronado’s unique constraints to development. This appears to have been based on what are likely erroneous statements by SANDAG staff that individual city adjustments would be a “red flag” to the California Department of Housing and Community Development (HCD).³ First, SANDAG had the statutory authority to overrule HCD as to the ultimate RHNA methodology under Government Code Section 65584.04(i)(2). Second, that it would be a hypothetical red flag is blatantly false because Government Code Section 65584.04(e)(2) requires SANDAG to look at each member jurisdiction individually. Because SANDAG refused to do so, the draft allocation to Coronado is not only flawed, but is not supported by law. Third, there was a false narrative appearing throughout the hearings related to RHNA that deference should be given to HCD’s opinions. That narrative was misplaced. SANDAG is not subservient to HCD, but is the final decision maker in how the units are allocated. SANDAG should follow the statutory mandates in exercising its allocation power, not some unfounded fear about illusory repercussions from HCD.

As outlined in the City’s previous letters to SANDAG (Attachments 1 and 3) and HCD (Attachment 2), approximately 71% of the City’s total land area (~7.7 square miles) falls under the jurisdiction of the U.S. Navy, the Unified Port District of San Diego, and the California Department of Parks and Recreation. The City has no land use authority over these areas and consequently cannot consider these areas when planning for future housing. Although some have correctly suggested that all cities in the SANDAG region have areas that are under the jurisdiction of other agencies, no other City in San Diego County has a majority of its land area occupied by other local, state, and federal agencies.

The remaining 2.2 square miles that fall under the City’s direct land use authority is densely developed with a high concentration of multi-family housing. Of the 2.2 square miles within the

¹ Testimony of U.S. Navy, Joe Stuyvesant on item 23, July 26, 2019 SANDAG Board of Directors Meeting, <https://www.sandag.org/index.asp?fuseaction=meetings.sc&mid=BOD072619&cName=Board%20of%20Directors&mType=Regular%20Session&mDate=7/26/2019>

² Mayor Salas’ discussion on item 23, July 26, 2019 SANDAG Board of Directors Meeting, <https://www.sandag.org/index.asp?fuseaction=meetings.sc&mid=BOD072619&cName=Board%20of%20Directors&mType=Regular%20Session&mDate=7/26/2019>

³ See staff discussion on item 7, September 6, 2019 SANDAG Board of Directors Meeting, <https://www.sandag.org/index.asp?fuseaction=meetings.sc&mid=BOD090619&cName=Board%20of%20Directors&mType=Special%20Session&mDate=9/6/2019>



City's land use jurisdiction, approximately 764 acres, or 1.2 square miles are unavailable for higher density residential development as outlined in the table below and shown in Attachment 4. Consequently, only 1.0 square mile of land is available in Coronado to accommodate the proposed 1,001 RHNA allocation.

Land Use Constraint	Acreage
APZ I (Accident Potential Zone)	174
APZ II	22
Airport Clear Zone	78
Historic Designation	86
Commercial Recreation Zone (Coronado Shores, Coronado Yacht Club, Recreation areas)	16
Civic Uses	42
Visitor Serving Hotel/Motel Zone	49
Parks and Designated Open Spaces	297
TOTAL	764 Acres (1.2 square-miles)

Approximately 95% of the City is zoned for residential use and there are very few vacant properties available to accommodate new housing. The City is also constrained by the Airport Influence Area and Accident Potential Zones of NASNI, which prevent any redevelopment with increased density and intensity or height. Vice-Chair Blakespear's comment "that the state doesn't consider any city to ever be built out" because "the state always see that you have room to go up"⁴ may be true for some cities but is false for Coronado, which does have height and other restrictions.

In addition to airport related height restrictions and increased density or intensified residential use prohibitions, the entire City of Coronado is also within the Coastal Zone. In 1972, California voters passed Proposition 20, the Coastal Zone Conservation Act to protect public access to the coast, to promote visitor-serving uses and to limit residential development and speculation along the coast. The Coastal Act was subsequently adopted in 1976 and the California Coastal Commission was formed to administer Coastal Act.

Residential uses are not coastal dependent uses and new high-density, multi-family housing would require Coastal Commission approval. The addition of 1,001 new housing units to Coronado would require a significant overhaul of the City's certified Local Coastal Program, including rezoning to allow more residential uses in commercial and visitor-serving zones, increasing height, floor area ratio, and density allowances, and reductions in off-street parking standards that would undermine the Coastal Act's requirements for coastal access, coastal views, and protection of visitor-serving uses. While SANDAG is permitted to consider a member agency's ability to change its zoning, it cannot require members to violate other laws to do so.

⁴ Vice-Chair Blakespear's discussion on item 12, May 10, 2019 SANDAG Board of Directors Meeting, <https://www.sandag.org/index.asp?fuseaction=meetings.sc&mid=BOD051019&cName=Board%20of%20Directors&mType=Regular%20Session&mDate=5/10/2019>



- (3) Statutory Factor under Government Code Section 65584.04(e)(9): The housing needs generated by the presence of a private university or a campus of the California State University or the University of California within any member jurisdiction.

Information Not Considered: On July 26, 2019, Mayor Jones testified that “we in San Marcos, we have about 38,000 students at CSU and Palomar College, so we have a lot of staff that comes in on a daily basis just for that simple reason.”⁵ Government Code Section 65584.04(e)(9) required SANDAG to consider the housing needs of colleges and universities as a separate factor or an adjustment in the allocations. Despite the statutory mandate, inexplicably, the Board completely ignored this key segment of the student population, which is our future, and needs low-income housing. SANDAG’s unsupported written comments that the transit factor accounts for the housing needs of colleges and universities is without any supporting data or studies whatsoever, and contrary to both readily available information and proffered testimony. For example, Mayor Jones complained that “the Sprinter doesn’t come very often” and “[w]e don’t have any parking lots around the Sprinter as well...”⁶ In other words, transit does not meet the needs of San Marcos generally, nor its students specifically and traffic is continuing to increase there. Failure to include an adjustment to allocations for additional units for cities with college and university campuses is a fatal flaw and contrary to Government Code Section 65584.04(e)(9) and requires revision to the allocations.

- (4) Statutory Factor under Government Code Section 65584.04(e)(12): Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65080....

Information Not Considered: The unique characteristics of active military jobs was a factor that was appropriately included under every past RHNA cycle. The apparent source for the dramatic departure from past RHNA methodologies were what appear to be misunderstood comments from SANDAG staff that HCD “basically needs to sign off on” the formula and “they would not accept the old methodology....”⁷ Those comments were, unfortunately, incorrect. While HCD had the ability to comment on the methodology, SANDAG could have adopted it over any HCD objection under Government Code Section 65584.04(i)(2). Excluding active military jobs is necessary to further the RHNA statutory objectives discussed below and was a proper factor under Government Code Section 65584.04(e)(12).

Additional information that was not considered was the desire of other member agencies to absorb additional units that cannot be accommodated in jurisdictions like Coronado. Throughout the hearings on RHNA, various members indicated that they wanted more units. Indeed, many

⁵ Mayor Jones’ discussion on item 23, July 26, 2019 SANDAG Board of Directors Meeting, <https://www.sandag.org/index.asp?fuseaction=meetings.sc&mid=BOD072619&cName=Board%20of%20Directors&mType=Regular%20Session&mDate=7/26/2019>

⁶ Mayor Jones’ discussion on item 23, July 26, 2019 SANDAG Board of Directors Meeting, <https://www.sandag.org/index.asp?fuseaction=meetings.sc&mid=BOD072619&cName=Board%20of%20Directors&mType=Regular%20Session&mDate=7/26/2019>

⁷ Comments by Seth Litchney and Hasan Ikhtrata, respectively on item 12, May 10, 2019 SANDAG Board of Directors Meeting, <https://www.sandag.org/index.asp?fuseaction=meetings.sc&mid=BOD051019&cName=Board%20of%20Directors&mType=Regular%20Session&mDate=5/10/2019>



jurisdictions have planned for more units than they are slated to receive in this cycle. Staff's consistent focus on an overly "simple" transit/jobs formula was without consideration for what each member wanted or could realistically build. It also caused the Board to lose sight of what had worked in all the past cycles. The factors that SANDAG applied under Government Code Section 65584.04(e)(12) successfully in past cycles should be used to revise the draft allocation to bring it into line with RHNA's statutory objectives.

The Draft Allocation to Coronado Undermines Statutory Objectives

Pursuant to Government Code Section 65584(d), and as submitted pursuant to Section 65584.04(b), the regional housing needs allocation plan shall further all of the following objectives:

- (1) Statutory Objective under Government Code Section 65584(d)(1): Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low and very low-income households.

The draft allocation undermines this statutory objective because it does not assign housing units in an equitable manner. The proposed allocation represents a 2,000% increase from the City of Coronado's prior RHNA allocation and is disproportionately higher than the increase proposed for any other city in the region. The proposed allocation also erroneously assigns all NASNI jobs to Coronado despite a noticeable portion of NASNI falling within the City of San Diego city limits. Moreover, by including active duty military jobs, but not no-cost and low-cost government providing housing, the formula does not accurately reflect the mix of existing housing types and affordability levels existing in Coronado. This disjunctive approach results in an inequitable allocation of total housing units and low- and very-low income units and thus fails to comply with this statutory objective.

- (2) Statutory Objective under Government Code Section 65584(d)(3): Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

The draft allocation undermines this statutory objective because it does not account for no-cost and low-cost housing already provided to active duty military personnel. Since most active duty military personnel already have government funded housing, any new housing built as a result of the RHNA process will not be for the benefit of service men and women stationed in Coronado.

Moreover, active duty military jobs are fundamentally different than other traditional job types. Coronado residents cannot apply for an active duty Navy job located in Coronado. People who enlist in the Navy cannot choose where they wish to be stationed or deployed; and consequently, construction of new housing in Coronado will not promote an improved intraregional relationship between jobs and housing.

For the reasons discussed above, a revision to the draft allocation is necessary to further the intent of the statutorily mandated objectives listed Government Code Section 65584(d).



This Appeal is Consistent with the City's Sustainable Communities Strategy:

This appeal is consistent with, and not to the detriment of, the development pattern in the applicable sustainable communities strategy developed pursuant to Government Code Section 65080(b)(2) because a revision to remove active duty military jobs from the RHNA formula would ensure a more equitable and logical outcome without undermining its jobs-housing-transit framework.

The City's Allocation Request:

The City of Coronado respectfully requests that SANDAG modify the allocations to exclude active military jobs in the City's job totals and to redistribute the units allocated to those jobs on a regional basis. Alternatively, the City would also support a redistribution of units derived from active duty military jobs to other member cities that have unmet housing capacity from past housing element update cycles.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "R. Bailey".

Richard Bailey, Mayor
City of Coronado

cc: Hasan Ikharta, Executive Director, SANDAG
City Councilmembers of the City of Coronado
Blair King, City Manager, City of Coronado

Attachments: 1. September 4, 2019 Letter to SANDAG
2. October 4, 2019 Letter to HCD
3. November 20, 2019 Letter to SANDAG
4. Land Use Constraints Figures

ATTACHMENT 1



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RICHARD BAILEY

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September 4, 2019

SANDAG Board of Directors
Attn: Mr. Seth Litchney, Regional Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: SANDAG RHNA Methodology

Dear Honorable Board Members:

The City of Coronado (City) appreciates the opportunity to share our comments and concerns with the proposed 2021-2029 Regional Housing Needs Assessment (RHNA) plan. The City recognizes development of the RHNA is a challenging endeavor and we sincerely appreciate the hard work and active engagement of SANDAG staff throughout the process.

Although the City believes it is philosophically sound for the RHNA methodology to target areas rich in jobs and public transportation for future housing development, we have grave concerns about the plan's disproportionate impact on Coronado. Under the proposed RHNA plan, Coronado would be assigned 1,001 new housing units, up from 50 and 64 units during the prior two housing cycles. While the City is committed to doing its fair share to address the region's housing shortage, the proposed 2000% RHNA increase is both unreasonable and impractical for the reasons outlined below.

The 2000% increase in Coronado's RHNA is disproportionate to other SANDAG cities and is unprecedented.

- The City recognizes that each agency's RHNA allocation may fluctuate between housing cycles; however, the proposed 2000% increase is unreasonable and will unduly burden a small coastal city with very limited capacity for growth.
- The next highest RHNA increase from the previous housing cycle is the City of Imperial Beach with an approximately 540% hike. While this also seems to be an unreasonable increase, it is nearly four times less than Coronado's.
- For context, a 2000% increase for the City of San Diego from the prior housing cycle would translate to a RHNA allocation of 1,761,920 new housing units.
- According to the CA Department of Finance, the City of Coronado currently has 9,740 total housing units. The proposed 1,001 new units would represent an approximate 10% increase in Coronado's housing stock over an eight-year period if planned units were constructed.

Coronado is constrained unlike any other city in San Diego County.

- Although the City of Coronado occupies 7.7 square miles of land within its boundaries, approximately 5.5 square miles, or 71% of the City, are owned by the U.S. Navy, the Unified Port District of San Diego, and the California Department of Parks and Recreation, none of which may be used to accommodate future housing. Consequently, the City only has land use authority over a 2.2 square mile area.
- The 2.2 square miles under the City's jurisdiction are densely developed with a high concentration of multi-family housing which provides limited geographic capacity to accommodate significant new growth.
- Coronado is a residential community which has a relatively small downtown area dedicated to commercial uses. There is a paucity of commercially zoned properties which could be converted to residential use types.
- 95% of the parcels in Coronado are already zoned for residential use and there are very few vacant properties, severely limiting the City's ability to meet the proposed RHNA by rezoning commercial properties or developing vacant land.
- The entire City of Coronado is within the coastal zone. Residential uses are not coastal dependent uses and new high-density, multi-family housing would require Coastal Commission approval and meet attendant off-street parking requirements.
- Coronado is within the Airport Influence Area and Accident Potential Zone of NAS North Island which will prevent any increased density or height.
- Coronado has a high concentration of designated historic homes which cannot reasonably be redeveloped with higher density multi-family units and the loss of historic properties would irreparably damage Coronado's unique community character.
- Coronado's only links to mainland San Diego are via the San Diego-Coronado Bridge and State Route 75 along the Silver Strand. Commuter trips generated by new housing would exacerbate already congested conditions on the Bridge and State Route 75 and there are no practical alternatives to increase traffic capacity.

The inclusion of military jobs in the RHNA formula unreasonably escalates Coronado's housing share.

- Naval Air Station North Island (NASNI) comprises almost 70% of Coronado's total land area, approximately 25% of its population, and 45% of its total jobs. No other city in San Diego County would be as significantly impacted by the presence of a military base in their jurisdiction.
- Active military jobs should not be included in the RHNA formula. Active duty military jobs are unique because military personnel are assigned to a base and have no choice where

to live and work. Moreover, local governments have no control over military base population, jobs, or housing provisions.

- While the proposed RHNA formula includes all active military jobs at NASNI, it does not account for housing already provided for the vast majority of service men and women who reside on base, aboard ships, or in federally subsidized military housing in San Diego County. Moreover, it is illogical to include thousands of Navy jobs assigned to aircraft carriers. Sailors who work aboard aircraft carriers are often deployed and not physically in Coronado. When they are ported in Coronado, sailors are provided housing either aboard the ship or within existing Navy barracks and therefore do not require any additional housing.
- NASNI provides regional economic benefits which are enjoyed throughout the SANDAG region while the City of Coronado disproportionately endures its traffic, noise, and other impacts. Providing additional housing for military personnel should be a shared burden between the entire San Diego region and the U.S. Navy, not just the City of Coronado.

Coronado's high land values makes it economically challenging to develop high-density affordable housing.

- Like many coastal California cities, Coronado is a highly desirable place to live and consequently has very high land costs which makes it economically challenging to develop high-density affordable housing. While the City of Coronado may ultimately endure a painstaking process to rezone its community to accommodate the desired high-density affordable housing, it is unlikely that the higher RHNA allocation will result in a significant increase in actual housing production.

Coronado is committed to facilitating development of new housing and promoting construction of affordable housing.

- The City exceeded its current RHNA allocation and continues to invest in the development of affordable housing in Coronado. Coronado currently has 171 deed-restricted affordable housing units and is committed to expanding the availability of affordable housing as funding and property becomes available.

For the reasons outlined above, the City of Coronado respectfully requests the SANDAG Board of Directors revise the draft RHNA plan to account for the unique circumstances and challenges in Coronado.

The City appreciates SANDAG's desire to adhere to its jobs-transit-housing methodology to determine RHNA allocations; however, the proposed RHNA plan fails to account for city-specific conditions and, if left unchanged, threatens to irreparably damage Coronado's unique community character. Accordingly, the City respectfully requests the Board direct SANDAG staff to recalibrate the RHNA assignments to ensure it does not disproportionately impact any member agency.

While we understand the California housing crisis requires each city and county make sacrifices to adequately address the problem, we do not believe a 2,000% RHNA increase is fair or reasonable, particularly when many neighboring cities would realize significant RHNA reductions

SANDAG Board of Directors
September 4, 2019

under the proposed plan. We would therefore support the small city adjustment proposed by the City of Solana Beach or any other mechanism which accounts for the unique circumstances and challenges facing each community and promotes an equitable and reasonable RHNA allocation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Bailey', with a long horizontal stroke extending to the right.

Richard Bailey
Mayor

RB/mlc

cc: City Council
City Manager

ATTACHMENT 2



CITY OF CORONADO
OFFICE OF THE MAYOR

RICHARD BAILEY

1825 STRAND WAY · CORONADO, CA 92118 · TEL (619) 522-7320 · RBAILEY@CORONADO.CA.US

October 4, 2019

Mr. Doug McCauley, Acting Director
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

RE: Draft 2021-2029 Regional Housing Needs Assessment Determination for the San Diego Region

Dear Mr. McCauley:

The City of Coronado (City) appreciates the opportunity to share our comments and concerns with the proposed 2021-2029 Regional Housing Needs Assessment (RHNA) plan submitted to your office by the San Diego Association of Governments (SANDAG). While the City of Coronado believes SANDAG's proposed methodology to target areas rich in jobs and public transportation may be philosophically sound, we have serious concerns about their inclusion of active duty military jobs in the RHNA formula and attendant requirements for host cities to produce housing for men and women of federal military branches. This unprecedented change to the RHNA methodology has resulted in a 2,000 percent increase in Coronado's RHNA allocation from past housing cycles while the San Diego region's overall RHNA increase was only six percent.

The City of Coronado is a small coastal city, entirely within the Coastal Zone, which occupies approximately 7.7 square miles of land area with a large military presence. Naval Air Station North Island (NASNI), Naval Amphibious Base Coronado (NAB), and the Navy Silver Strand Training Complex account for nearly 70% of Coronado's total land area, leaving approximately 2.2 square miles under the City's direct land use authority (attachment 1). The U.S. Navy is also the City's largest employer. According to SANDAG, the U.S. Navy employs a total of 16,981 people in Coronado, consisting of 12,715 active duty military and 4,266 civilian personnel, which represents nearly 62% of the City's total jobs.

Under the proposed SANDAG RHNA formula, Coronado would be solely responsible for accommodating housing for employees of the U.S. Navy stationed in the City, whether deployed or home based, and despite the fact that a noticeable portion of NASNI is located within the

municipal boundaries of the City of San Diego¹. This is a severe flaw in SANDAG's proposed methodology. If approved by HCD, this formula could be employed by other Metropolitan Planning Organizations to impose unrealistic housing demands on other small California cities which host large military installations.

Military jobs are unique and should be treated differently from traditional jobs in the RHNA process for several reasons. Unlike traditional employers, the U.S. Department of Defense (DoD) provides housing for its active duty employees through on-base housing, off-base military housing (e.g., Lincoln Housing), housing aboard ships (e.g., aircraft carriers), and rental subsidies. It is therefore illogical to require local cities to accommodate and/or produce additional housing for active duty military personnel who already have housing provided by the federal government.

Moreover, while the proposed SANDAG RHNA formula would require Coronado to accommodate additional housing for military jobs, the Navy's planned development of new housing during the 2021-2029 planning cycle would not be counted toward Coronado's housing production goals. If the proposed RHNA methodology is premised on a goal of developing additional housing for active duty military members, the actual production of new units should also be counted, regardless of whether the units are built by the federal government, local government, or the private sector.

It is also important to note that the population and associated jobs within U.S. military installations can fluctuate significantly based on deployment activity, recruitment numbers, and DoD decisions to increase or decrease base personnel to meet national defense objectives. For example, NASNI is currently the homeport for two aircraft carriers, each of which can accommodate up to 5,000 active duty service members. However, these carriers are often deployed at sea and are only temporarily present in Coronado. The draft RHNA formula, however, does not account for the transient nature of these jobs which can fluctuate by +/- 10,000 depending on deployment conditions.

The City of Coronado is committed to doing its fair share to address California's growing housing problem. The City will continue to pursue opportunities to produce more housing and to increase the availability of housing for low-moderate income households. However, we fundamentally disagree that California cities should be responsible for providing housing for active duty military personnel employed and housed by the federal government. If SANDAG's RHNA proposal is ultimately adopted, HCD will be effectively endorsing a transfer of responsibility for housing active duty military from the federal government to local California cities. We do not believe relieving the federal government from its housing responsibilities is an effective means to increase housing production. California needs more housing for the civilian population.

In addition to the inherent flaw of requiring cities to develop housing for active duty military, the City of Coronado is uniquely challenged by geographic and regulatory constraints which may

¹ The City of Coronado and the City of San Diego entered into a subvention agreement in 1986 which, in part, requires the City of Coronado to make subvention payments to the City of San Diego for a proportionate share of any federal and state funds Coronado receives to account for Navy personnel who live aboard ships which are physically located within San Diego city limits. The SANDAG RHNA methodology assigned all Navy personnel stationed at NASNI to Coronado, regardless of whether those personnel were within Coronado city limits.

render it impossible to accommodate the proposed 1,001 new housing units allocated under the RHNA methodology.

Coronado is located entirely within the coastal zone (attachment 2) which will further complicate the City's ability to meet the proposed RHNA. Recent state legislation identifies the need to harmonize housing and the protection of the coast. Coronado's 2,000 percent increase via the RHNA allocation is not consistent with the Coastal Act and Public Trust Doctrine in that the demand for housing production comes at the expense of the protection of coastal resources and the general public's use and enjoyment of tidelands and waterways.

Housing is not a coastal dependent use and the California Coastal Commission is typically reluctant to allow cities to intensify development through the conversion of commercial properties, reduced parking standards, and greater restrictions on hospitality uses, all of which will be necessary to accommodate an additional 1,001 units within an already dense 2.2 square-mile area. Moreover, Coronado's certified Local Coastal Program (LCP) specifically requires the City to maintain its current parking ratios, building heights, historic preservation program, and to retain or expand the availability of visitor-serving uses (attachment 3). Parking supply in Coronado is already stressed by approximately two million annual visitors and the number of tourists is expected to rise as population increases outside Coronado. Further depleting the City's parking supply to accommodate 1,001 new residential units could consequently impair visitor access to the coast.

Coronado is also located within the Airport Influence Area of NASNI and has residential neighborhoods within the Accident Potential Zone. Consequently, these areas cannot accommodate greater residential densities or building heights to meet RHNA requirements.

Coronado is already a densely developed residential community, with approximately 95% of its property zoned exclusively for residential uses and a high concentration of designated historic homes and structures. There are very few non-residential properties which could reasonably be redeveloped with residential uses. Converting Coronado's limited commercial and hospitality zoned areas would result in more residents travelling outside the City for employment which is contrary to the State of California and SANDAG goal of promoting a jobs-housing-transit balance.

Finally, Coronado's "island" geography imposes significant limitations on the City's ability to grow. The City's only links to mainland San Diego are via the San Diego-Coronado Bridge and State Route 75 along the Silver Strand. Increasing density in the City will generate additional traffic along these already congested highways with no reasonable possibilities to widen the roads or mitigate exacerbated traffic impacts. Moreover, Coronado is completely surrounded by water, U.S. Navy property, State of California Department of Parks and Recreation lands, and Unified Port of San Diego property, none of which is available to accommodate housing. Coronado geography also leaves it particularly vulnerable to sea level rise which will make it impractical to increase density near the shore or in other low lying, flood prone areas.

In addition to the above, attached is the letter submitted to SANDAG originally outlining the City's concerns (attachment 4). We appreciate your consideration in addressing our concerns.

Mr. McCauley
Page 4
October 4, 2019

If you have any questions, please contact Rich Grunow, Community Development Director, at 619-522-7338.

Sincerely,

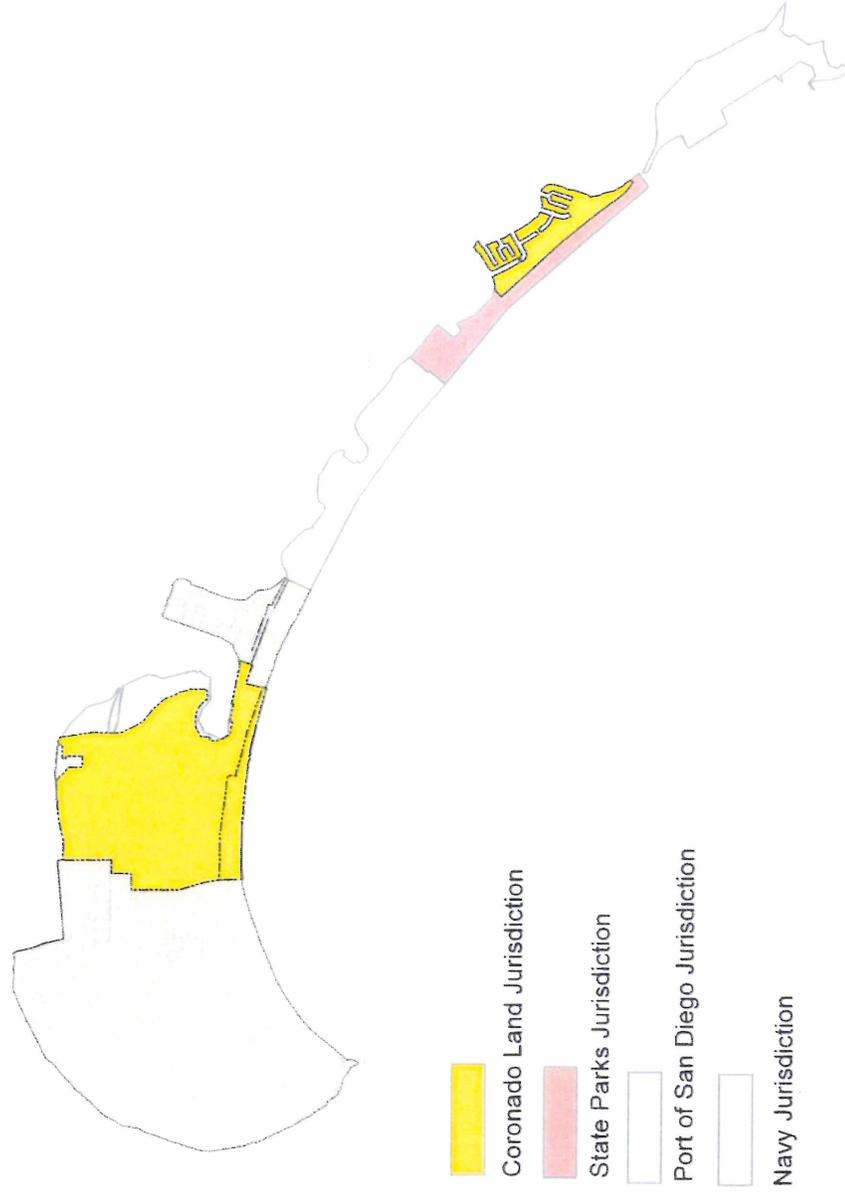
A handwritten signature in black ink, appearing to read 'R. Bailey', written in a cursive style.

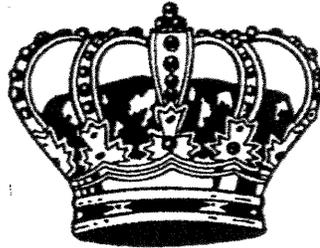
Richard Bailey
Mayor

RB/rg

- Attachments:
1. Coronado Land Use Jurisdiction Map
 2. Coronado Coastal Zone Figure
 3. Excerpts from Coronado's Certified LCP
 4. September 4, 2019 letter to SANDAG

ATTACHMENT 1 - LAND USE JURISDICTION MAP





CITY OF CORONADO

LOCAL COASTAL PROGRAM LAND USE PLAN

Adopted by Coronado Planning Commission August 26, 1980
Adopted by Coronado City Council December 3, 1980
Revised by Coronado City Council May 12, 1981
Certified by California Coastal Commission December 1983
Amended 1989, 1991, 1995, 1996, 1999, 2001, 2003, 2004, 2005

CITY OF CORONADO
COMMUNITY DEVELOPMENT DEPARTMENT
1825 STRAND WAY
CORONADO, CA 92118

II. ADOPTED POLICIES

Listed below are the LCP policies for the City of Coronado

A. SHORELINE ACCESS

1. Preserve existing shoreline access over public lands.
2. Where appropriate, provide and encourage additional shoreline access over public lands.
3. Encourage the restriction of shoreline access in the City's "wetlands", "environmentally sensitive habitat areas" and the proposed "Wildlife Preserve Modifying Zone".
4. Ascertain and preserve public prescriptive rights.
5. Wherever appropriate and feasible, add public facilities, including parking areas or facilities, to mitigate against the impacts of overcrowding or overuse by the public of any single area.

6. Regulate on-site parking in a manner to safe-guard the residential character of neighborhoods, to assure that a public nuisance is not created, and to preserve the sensitive natural environment of beach and shoreline areas provided that such regulation does not result in any diminution of existing public parking available at present or future bayfront or ocean front access points and public recreation areas. (Decal Parking District Amendment).

B. RECREATION AND VISITOR SERVING FACILITIES

1. Preserve existing public recreational facilities for public use.
2. Maintain the quality and number of existing visitor accommodations at or above their present levels, and encourage the provision of new low-cost visitor accommodations and the expansion of existing low-cost visitor accommodations.
3. Increase access to and encourage the use of the extensive beach frontage along the Silver Strand.
4. Preserve and protect identified environmentally sensitive areas along the shoreline where feasible.
5. Encourage the protection of any available public waterfront land suitable for future recreational development.
6. Maintain high standards for visual aesthetics and preserve these scenic qualities as recreational resources.

"Developable Water Area" (as defined above in Policy "F6").

G. HAZARD AREAS

1. Require that new development in areas of high geologic, flood or fire hazard be designed in such a way to minimize risks to life and property.
2. Require that new development be designed in such a way to assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
3. Reaffirm the City's environmental policies (as presented in the City's LCP report for Policy Group 103) and shoreline structures policies (as presented in the City's LCP report for Policy Group 104) as they relate to shoreline erosion.

H. VISUAL RESOURCES AND SPECIAL COMMUNITIES

- | |
|--|
| <ol style="list-style-type: none">1. Consider and protect as a resource of public importance the scenic and visual qualities of the community.2. Require that permitted development be sited and designed to safeguard existing public views to and along the ocean and bay shores of Coronado, <u>to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.</u> |
| <ol style="list-style-type: none">3. Require that signs preserve the character and quality of the community's visual environment, and that they not block significant coastal views, or detract from the natural beauty of the coast.4. Reaffirm the Environmental Design Review Commission as an agency to assist in the achievement of "...a beautiful, pleasant, principally residential community by fostering and encouraging good design, harmonious colors and materials, good proportional relationships and generous landscaping, and to protect the health, safety, comfort and general welfare of the citizens of Coronado by providing for an environmental design review process." ([5], p. 298).5. Reaffirm the Scenic Highway Element of the City's General Plan which designates the Silver Strand and San Diego Coronado Bay Bridge portions of State Highway 75 as Scenic Highway, and the Scenic Highway Modifying Chapter of the City's Zoning Ordinance which regulates land use adjoining Scenic Highways. |
| <ol style="list-style-type: none">6. Officially encourage and recognize private efforts to designate, rehabilitate, preserve and make viable, historic and architecturally significant structures in the community. |
| <ol style="list-style-type: none">7. Designate and encourage the rehabilitation, preservation and viability of the community's historic and architecturally significant structures. |

- a. Maintain and enhance the scenic beauty and architectural interest of Glorietta Bay.
- b. Require preservation, proper care, and planting of the Community's trees in order to maintain coastal views and the Community's character.

c. Require that development in the entire community generally be compatible in height and bulk with existing development to preserve the scale and character of the community.

d. Reaffirm the City's environmental, shoreline structures, and hazard areas policies (as found respectively in Local Coastal Program reports 103, 104 and 106) as they relate to visual resources.

I. PUBLIC WORKS (No additional policies for this subject)

J. LOCATING AND PLANNING NEW DEVELOPMENT

1. Preserve and protect private ownership, use and enjoyment of property in carrying out the policies of the Coastal Act.

2. Assure that new development permitted within the City be designed to maintain public access to the coast by:

a. Providing adequate parking facilities or providing substitute means of serving the development with public transportation.

b. Reasonably mitigating adverse archaeological or paleontological impacts resulting from the development;

c. Insuring that recreational facilities should be a matter of consideration for all new development; and by

d. Encouraging non automobile circulation within the development when feasible.

3. Give coastal-dependent developments priority over other developments on the coast.

4. Permit coastal-dependent facilities to expand, and to have reasonable long-term growth within their existing sites.

5. Correlate new development with local park acquisition and/or the provision of on-site recreational facilities when, and if, applicable.

6. Reaffirm the City's adopted Local Coastal Program policies as they relate to locating and planning new development.

criteria for the R-PCD Zone in order to assure adequate public lateral, vertical and visual shoreline access at the old ferry landing site.

3. That the City request the San Diego Unified Port District to construct (as depicted in the City's General Plan and the Port District's Master Plan) a pedestrian and bicycle path around and through its Coronado property. That the City urge that this path circumscribe the Oakwood Apartment Complex, and that bayward of the Oakwood complex the path be placed on a deck supported by piers at a level slightly below the existing bluff in order to minimize any adverse environmental impacts. Pedestrian and Bicycle Path Implemented, no deck with piers.
4. That the City continue to give full support to the construction of the San Diego Bayroute Bikeway.
5. That the City, in cooperation with the City of Imperial Beach, continue the evaluation of the bus route up the Silver Strand. That expansion of this service be undertaken when feasible in order to facilitate shoreline access (e.g. additional buses during recreational peak use periods, additional scheduled bus stops, etc.).
6. That the City continue to encourage the San Diego Unified Port District to develop the Coronado tidelands in a manner that would encourage and facilitate shoreline access.
7. That the City encourage preservation of the City's visitor accommodations.
8. That the City request the Navy to provide a boat launching ramp for public use on San Diego Bay. Eliminated with 911 and adoption of Glorietta Bay Master Plan in 2003.
9. Deleted.

10. That the City facilitate shoreline access by developing a program to provide additional and to maintain adequate public parking spaces in and near the Orange Avenue Corridor and coastal recreational areas of the City. This parking implementation program shall implement the following Land Use plan goals and be developed as Local Coastal Program implementation measures (OACSP LCP Amendment):
 - a. The City shall develop a survey of the amount and utilization of parking currently available for public recreational use, and the current and future demand for such parking for beach and shoreline access in the near shore areas at the northern and southern ends of the Orange Avenue Corridor.
 - b. The City shall evaluate the impact that development in parking impacted areas of the Orange Avenue Corridor has on public access to the shoreline, specifically, in the near shore areas southeast of F Street, northeast of 2nd Street and within the Glorietta Bay Master Plan area.

- c. The City shall develop and implement specific measures designed to address any parking shortfalls identified in coastal recreational or tourist commercial areas.
- d. New development in the Orange Avenue Corridor shall be encouraged to provide more off-street parking than the minimum required, and the City may require additional parking beyond the minimum necessary to meet the parking standards within the specific plan, if necessary to address any potential adverse impacts on public access to the coast.
- e. Specific measures to promote the City's leasing or assuming liability for public parking in existing private facilities during those hours for which those facilities are closed shall be developed and implemented.
- f. The plan shall evaluate the feasibility of constructing a central parking facility paid for in part or in whole through development in-lieu fees.

11. Deleted

12. Where public prescriptive rights exist in association with development, the review procedures in accordance with the Attorney General's Implied Dedication and Prescriptive Rights Manual shall be utilized to further investigate the possibility of prescriptive rights of access and to protect such rights as necessary. Developments shall not be approved if they interfere with public prescriptive rights, or developments located where there is public use shall be required to provide public access as a condition of permit approval. Proposed developments shall be sited and designed in a manner which does not interfere with the area of use, or developments shall provide for an equivalent area and use on site. In either situation, prior to issuance of a permit, applicants will be required to record offers of dedication or other suitable documents.
13. That offers of dedication of easements to local or state agencies or private associations for public access along the shoreline (lateral access) shall be required in association with new development fronting on the ocean or bay except for repair and maintenance activities or replacement of structures destroyed by natural disaster. In addition, improvements to any structure or demolition and reconstruction of single-family residences would be exempted from lateral access easement requirements unless such improvements interfere with currently existing public views, block a public access way, or causes further encroachment of the structure seaward or toward the edge of the bluff (PRC 30212). Specifically, easements would be required: 1) Seaward of the toe of the existing bluffs, or vegetation lines where new development is proposed on existing developed lots, and 2) Seaward of proposed new seawalls or other shoreline protective devices (consistent with Administrative Regulation Section 13252, California Coastal Commission Regulation, Title 14, Calif. Admin. Code)

14. That in accordance with the City's Sign Ordinance, the City shall make provisions for signs as approved by the Environmental Design Review Commission and Traffic Safety Committee to:
 - a. Notify of shoreline access paths;
 - b. Notify of automobile routes to the beach;
 - c. Notify of automobile beach parking;
 - d. Notify of coastal recreational facilities (e.g. boat ramps, marinas, restrooms, etc.);
 - e. Notify of the unique and sensitive nature of the City's proposed "Wildlife Preserve Modifying zone"
 - f. Notify of official bicycle paths.

- | |
|--|
| <ol style="list-style-type: none">15. That the City continue to assure that adequate public parking facilities are available in all areas of the City. Maintaining sufficient, free public parking for visitors shall be a priority in shoreline areas.16. That the City encourage the utilization or reconfiguration of public right-of-way or public parking use. |
|--|

B. RECREATION AND VISITOR SERVING FACILITIES

1. In 2003, the City adopted the Glorietta Bay Master Plan for the development of Glorietta Bay as a significant public recreational facility. The plan was adopted as part of the Local Coastal Program Land Use Plan and is described in detail in Figure 13.
2. That the City continue to support development of the proposed bay route bikeway along the Silver Strand.
3. That no new development shall be permitted on existing sandy beach areas. An exception would be allowed for new or expanded permanent lifeguard facilities, restroom facilities, or bike paths if it can be determined that adverse impacts to public beaches are negligible or when public safety or health requires it, and provided that no less environmentally damaging alternatives exist.
4. That the City improve vehicular circulation to coastal recreation and visitor-serving facilities and encourage use of alternative or mass transportation facilities as recommended in LCP-108.
5. That the City encourage the San Diego Unified Port District to develop their tidelands property in a manner that would increase public recreational use and visitor serving facilities.
6. That demolition of existing hotel/motel facilities shall not be permitted unless comparable replacement units will be provided on-site or elsewhere within designated commercial areas.

waterways, but may be calculated including habitat preserved for native ecosystems. Total landscaping on the site of off-street parking areas shall amount to no less than fifteen percent of the parking site area. Required parking spaces shall not be considered as a portion of the required landscaping

11. That the City shall review proposed signing (that is not specifically exempt from such review) to assure that it conforms to the standards in the City's sign ordinance.

I. PUBLIC WORKS

1. That the City lengthen the existing right-turn lane from Orange Avenue to Dana place.
2. That the City direct beach-going motorists to use Churchill Place rather than Dana Place.
3. That the City direct beach-going traffic toward public parking areas along Glorietta Bay, Avenida de Las Arenas and Avenida Lunar.
4. That the City, in cooperation with the City of Imperial Beach, continues support of the new bus route up the Silver Strand.
5. That the City strive to have implemented a pedestrian and bicycle ferry service between the Coronado Peninsula and the City of San Diego. Implemented.
6. Development of the "Bay Route" bikeway in accordance with the recommendations in the "Bay Route" Bikeway Study. A Bicycle Master Plan was adopted in March 2011.

7. That the number of off-street parking spaces required shall be no less than hereinafter listed :
 - a. Non-specified land uses: Where the minimum number of parking spaces for a use are not specifically provided for herein, the minimum number of parking spaces for such use shall be established by the Planning Commission, and such determination shall be based upon the requirements for the most comparable uses herein described.
 - b. Orange Avenue Corridor Specific Plan: All development within the Commercial Zone shall provide the number of parking spaces required by Title 88 of the Orange Avenue Corridor Specific Plan.
 - c. Tidelands Overlay Zone: All development within the Tidelands Overlay Zone shall provide the number of parking spaces required by this Title, or the number of spaces required by California Department of Boating and Water Ways, or the San Diego Unified Port District, or the California Coastal

Commission, whichever parking standard requires the greater number of parking spaces.

- d. Dwellings.
 - 1. Single family dwelling buildings or duplexes (new construction) two spaces, covered, per dwelling unit;
 - 2. Single family dwelling buildings or duplexes (existing construction) two spaces, one of which is to be covered per dwelling unit;
 - 3. For multiple dwellings, there shall be provided no less than two parking spaces for each dwelling unit. (Ord 1650)
 - 4. Multiple dwellings, R-5 zone, one and one-half spaces per dwelling unit; (Ord 1559)
 - 5. For residential projects with senior housing, there shall be provided one parking space for each senior dwelling unit.
 - 6. For residential projects with affordable housing, there shall be provided one and one-half spaces per for each affordable dwelling unit.
- e. Limited residential special care facilities in the Residential-Special Care Development Zone. One space per two habitable units; (Ord. 1559)
- f. Nursing homes Convalescent Homes or other than General Hospitals. One space for each three patient beds;
- g. General Hospitals. One space per patient bed; one space per three hundred square feet of gross floor area of medical or dental office space; plus one parking space per two employees, determined at the month, day and hour when the greatest number of employees are on duty;
- h. Trailer or Mobile Home Parks. (Repealed) (Ord. 1689)
- i. Hotels or Motels. One space per two habitable or dwelling units; one space per two employees, determined at the month, day and hour when the greatest number of employees are on duty; 20 percent of the parking spaces required by this Chapter for meeting halls; and 30 percent of the parking spaces required by this Chapter for all other uses on the site (e.g., restaurants, bars, nightclubs, general commercial or retail use, et cetera). (Ord 1861)
- j. Repealed. (Ord 1861)
- k. Business Office, Service, Professional or Retail Use. One space per five hundred square feet of gross floor area, plus one parking space per two

employees, determined at the month, day and hour when the greatest number of employees are on duty, with a minimum of five spaces required for Banks and Savings and Loan Associations; (Ord. 1708)

- l. Repealed. (Ords. 1708 and 1954)
- m. Repealed. (Ord. 1954)
- n. Eating and Drinking Establishments, Fast-Food and Formula Fast Food
 1. One space for each three seats and one space for each fifty-four inches of clear bench space, excluding dance floors and assembly areas without fixed seats which shall be calculated separately as one space for each fifty square feet of floor area; plus one parking space per two employees determined at the month, day and hour when the greatest number of employees are on duty.
 2. Fast food and formula fast food restaurants shall have parking requirements calculated by the above standard, however, a minimum of ten (10) parking spaces shall be provided for these uses. The change of ownership shall not, by itself, require the provision of additional parking.
 - a. For Fast Food Restaurants, required parking shall be provided on site, or by parking allocation credits, joint use, common facilities or facilities on private property on the same block within 200 feet of the site.
 - b. For Formula Fast Food Restaurants, Parking Allocation Credits may be applied to satisfy the parking requirement in excess of ten parking spaces. However, the initial ten spaces shall be parking spaces provided by means other than utilizing parking allocation credits, and shall be required when:
 1. A new Formula Fast Food Restaurant is established;
 2. An existing Formula Fast Food Restaurant is relocated; or
 3. An existing Formula Fast Food Restaurant is physically expanded in a manner to increase the restaurant's seating capacity.
- o. Churches, Mortuaries, Funeral Homes, Theaters, Assembly Halls, Auditoriums, Meeting Halls. One space for each five fixed seats, one space for each ninety inches of clear bench space, and one space for each fifty square feet of floor area used for assembly purposes;
- p. Service Stations. There shall be a minimum of five off-street parking spaces or one off-street parking space for each pump island and two off-street parking spaces for each service bay whichever is greater; plus one parking space per two employees, determined at the month, day and hour when the

greatest number of employees are on duty;

- q. Repealed (Ord. 1954)
- r. Massage Establishments. One parking space per employee, determined at the month, day and hour when the greatest number of employees are on duty, and one space for each one hundred square feet of gross floor area;
- s. Marinas, Yacht Clubs and dry boat storage yards. Three car parking spaces for every four boat slips and three car parking surfaces for every seven dry boat storage spaces for marinas, yacht clubs and for dry boat storage yards that contain boat launching facilities.
- t. Schools and Classrooms. One parking space per two employees, determined at the month, day and hour when the greatest number of employees are on duty; plus, for high school or adult education classes, one parking space per five students, determined at the month, day and hour when the greatest number of students are enrolled. (Ord. 1544, 1571)
- u. Repealed (Ord. 1954)
- v. Parking Lots or Structures. One parking space per two employees, determined at the month, day and hour when the greatest number of employees are on duty. (Ord. 1706)
- w. Mixed Use Developments. Two Parking spaces per dwelling, and that parking that would otherwise be required for the other uses on the site. (Ords. 1954, 1906, 1881, 1868, 1861, 1786, 1708, 1706, 1689, 1688, 1571, 1559, 1544)
- x. Title 88 Orange Avenue Corridor Specific Plan, Chapter IV Commercial Zone section IV. J. Off Street Parking

J.1 Purpose:

It is the purpose of this Section to provide for regulations governing the number of parking spaces required based on the type of use in the Commercial Zone. No other Chapter shall be used to determine or exempt the number of parking spaces required through this Section.

J.2 Regulations

- a. No parking is required for first floor uses on small parcels less than or equal to 7,000 square feet, except for eating and drinking establishments and in conformance with Chapter IV, Section J.2.f
- b. First floor uses on large parcels greater than 7,000 square feet or having more than 65 lineal feet of street frontage are required to provide one (1) parking space per each 500 square feet of floor area, except for eating and drinking



CITY OF CORONADO

OFFICE OF THE MAYOR

RICHARD BAILEY

1825 STRAND WAY • CORONADO, CA 92118 • (619) 522-7320 • RBAILEY@CORONADO.CA.US
September 4, 2019

SANDAG Board of Directors
Attn: Mr. Seth Litchney, Regional Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: SANDAG RHNA Methodology

Dear Honorable Board Members:

The City of Coronado (City) appreciates the opportunity to share our comments and concerns with the proposed 2021-2029 Regional Housing Needs Assessment (RHNA) plan. The City recognizes development of the RHNA is a challenging endeavor and we sincerely appreciate the hard work and active engagement of SANDAG staff throughout the process.

Although the City believes it is philosophically sound for the RHNA methodology to target areas rich in jobs and public transportation for future housing development, we have grave concerns about the plan's disproportionate impact on Coronado. Under the proposed RHNA plan, Coronado would be assigned 1,001 new housing units, up from 50 and 64 units during the prior two housing cycles. While the City is committed to doing its fair share to address the region's housing shortage, the proposed 2000% RHNA increase is both unreasonable and impractical for the reasons outlined below.

The 2000% increase in Coronado's RHNA is disproportionate to other SANDAG cities and is unprecedented.

- The City recognizes that each agency's RHNA allocation may fluctuate between housing cycles; however, the proposed 2000% increase is unreasonable and will unduly burden a small coastal city with very limited capacity for growth.
- The next highest RHNA increase from the previous housing cycle is the City of Imperial Beach with an approximately 540% hike. While this also seems to be an unreasonable increase, it is nearly four times less than Coronado's.
- For context, a 2000% increase for the City of San Diego from the prior housing cycle would translate to a RHNA allocation of 1,761,920 new housing units.
- According to the CA Department of Finance, the City of Coronado currently has 9,740 total housing units. The proposed 1,001 new units would represent an approximate 10% increase in Coronado's housing stock over an eight-year period if planned units were constructed.

Coronado is constrained unlike any other city in San Diego County.

- Although the City of Coronado occupies 7.7 square miles of land within its boundaries, approximately 5.5 square miles, or 71% of the City, are owned by the U.S. Navy, the Unified Port District of San Diego, and the California Department of Parks and Recreation, none of which may be used to accommodate future housing. Consequently, the City only has land use authority over a 2.2 square mile area.
- The 2.2 square miles under the City's jurisdiction are densely developed with a high concentration of multi-family housing which provides limited geographic capacity to accommodate significant new growth.
- Coronado is a residential community which has a relatively small downtown area dedicated to commercial uses. There is a paucity of commercially zoned properties which could be converted to residential use types.
- 95% of the parcels in Coronado are already zoned for residential use and there are very few vacant properties, severely limiting the City's ability to meet the proposed RHNA by rezoning commercial properties or developing vacant land.
- The entire City of Coronado is within the coastal zone. Residential uses are not coastal dependent uses and new high-density, multi-family housing would require Coastal Commission approval and meet attendant off-street parking requirements.
- Coronado is within the Airport Influence Area and Accident Potential Zone of NAS North Island which will prevent any increased density or height.
- Coronado has a high concentration of designated historic homes which cannot reasonably be redeveloped with higher density multi-family units and the loss of historic properties would irreparably damage Coronado's unique community character.
- Coronado's only links to mainland San Diego are via the San Diego-Coronado Bridge and State Route 75 along the Silver Strand. Commuter trips generated by new housing would exacerbate already congested conditions on the Bridge and State Route 75 and there are no practical alternatives to increase traffic capacity.

The inclusion of military jobs in the RHNA formula unreasonably escalates Coronado's housing share.

- Naval Air Station North Island (NASNI) comprises almost 70% of Coronado's total land area, approximately 25% of its population, and 45% of its total jobs. No other city in San Diego County would be as significantly impacted by the presence of a military base in their jurisdiction.
- Active military jobs should not be included in the RHNA formula. Active duty military jobs are unique because military personnel are assigned to a base and have no choice where

to live and work. Moreover, local governments have no control over military base population, jobs, or housing provisions.

- While the proposed RHNA formula includes all active military jobs at NASNI, it does not account for housing already provided for the vast majority of service men and women who reside on base, aboard ships, or in federally subsidized military housing in San Diego County. Moreover, it is illogical to include thousands of Navy jobs assigned to aircraft carriers. Sailors who work aboard aircraft carriers are often deployed and not physically in Coronado. When they are ported in Coronado, sailors are provided housing either aboard the ship or within existing Navy barracks and therefore do not require any additional housing.
- NASNI provides regional economic benefits which are enjoyed throughout the SANDAG region while the City of Coronado disproportionately endures its traffic, noise, and other impacts. Providing additional housing for military personnel should be a shared burden between the entire San Diego region and the U.S. Navy, not just the City of Coronado.

Coronado's high land values makes it economically challenging to develop high-density affordable housing.

- Like many coastal California cities, Coronado is a highly desirable place to live and consequently has very high land costs which makes it economically challenging to develop high-density affordable housing. While the City of Coronado may ultimately endure a painstaking process to rezone its community to accommodate the desired high-density affordable housing, it is unlikely that the higher RHNA allocation will result in a significant increase in actual housing production.

Coronado is committed to facilitating development of new housing and promoting construction of affordable housing.

- The City exceeded its current RHNA allocation and continues to invest in the development of affordable housing in Coronado. Coronado currently has 171 deed-restricted affordable housing units and is committed to expanding the availability of affordable housing as funding and property becomes available.

For the reasons outlined above, the City of Coronado respectfully requests the SANDAG Board of Directors revise the draft RHNA plan to account for the unique circumstances and challenges in Coronado.

The City appreciates SANDAG's desire to adhere to its jobs-transit-housing methodology to determine RHNA allocations; however, the proposed RHNA plan fails to account for city-specific conditions and, if left unchanged, threatens to irreparably damage Coronado's unique community character. Accordingly, the City respectfully requests the Board direct SANDAG staff to recalibrate the RHNA assignments to ensure it does not disproportionately impact any member agency.

While we understand the California housing crisis requires each city and county make sacrifices to adequately address the problem, we do not believe a 2,000% RHNA increase is fair or reasonable, particularly when many neighboring cities would realize significant RHNA reductions

SANDAG Board of Directors
September 4, 2019

under the proposed plan. We would therefore support the small city adjustment proposed by the City of Solana Beach or any other mechanism which accounts for the unique circumstances and challenges facing each community and promotes an equitable and reasonable RHNA allocation.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Bailey", with a long horizontal stroke extending to the right.

Richard Bailey
Mayor

RB/mlc

cc: City Council
City Manager

ATTACHMENT 3



CITY OF CORONADO

OFFICE OF THE MAYOR

RICHARD BAILEY

1825 STRAND WAY • CORONADO, CA 92118 • (619) 522-7320 • RBAILEY@CORONADO.CA.US

November 20, 2019

SANDAG Board of Directors
Attn: Mr. Seth Litchney, Regional Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: SANDAG RHNA Methodology

Dear Honorable Board Members:

The City of Coronado (City) appreciates the opportunity to share our comments with the proposed 2021-2029 Regional Housing Needs Assessment (RHNA) plan. As we have previously stated in multiple correspondences, the City remains concerned that SANDAG's RHNA methodology is flawed and results in a disproportionate housing allocation for Coronado. We have attached copies of our prior written correspondence to SANDAG and the California Department of Housing and Community Development (HCD) for your reference.

While the City recognizes and appreciates the need for the region to develop more housing, we wish to reiterate our strong objection to the use of active duty military jobs in the RHNA formula. During early deliberations with member agencies about the RHNA process, SANDAG staff noted that active duty military jobs would not be included in the RHNA formula (attached). Sometime thereafter, SANDAG staff changed course and added active duty military jobs to the draft methodology. Although the reasoning has never been clear to the City, SANDAG staff has reported that active duty military jobs were added to the formula following requests from other cities to exclude university and college jobs. Excluding university and college jobs is expressly prohibited by state law. In fact, the RHNA statute requires that a jurisdiction's affordable housing units be increased due to the presence of student populations. See Government Code section 65584.04(b)(9).

In contrast, there is no statutory requirement to include military jobs in a RHNA methodology. As we have previously stated, active duty military jobs are unique for several reasons. Active duty personnel are transitory employees who predominantly originate from outside San Diego County and whom have no choice over where they are stationed. Additionally, the vast majority of active duty personnel already receive federally subsidized housing. Most service members live in on-base barracks, off-base housing provided for the exclusive use of active duty personnel and their families, or aboard ships. Moreover, local governments have no control over military base population, jobs, or housing provisions. Accordingly, the City continues to believe that it is irrational to require housing for active duty military personnel who already have government provided housing.



The City also remains flummoxed by SANDAG's decision to include active duty military jobs assigned to aircraft carriers. An aircraft carrier may accommodate as many as 5,000 jobs and those personnel spend a significant amount of time out-to-sea or ported in other installations. And while those personnel also spend considerable time in Coronado, they always have a government provided housing unit.

It is important to reemphasize that the inclusion of active duty military jobs in the RHNA formula has an oversized impact on Coronado. Naval Air Station North Island (NASNI) comprises almost 70% of Coronado's total land area, approximately 25% of its population, and 62% of its total jobs¹. No other city in San Diego County would be as significantly impacted by the presence of a military base in their jurisdiction.

According to SANDAG, the City of Coronado supports 12,715 active duty military jobs. SANDAG staff has indicated the source of this figure is the *2016 Demographics Profile of the Military Community* which reports 7,439 sponsors stationed at NASNI and 5,302 at Coronado Navy Amphibious Base, for a total of 12,741. To date, SANDAG has not explained whether the 12,715 active duty military jobs is based on the 12,741 sponsors cited in the 2016 Demographics Profile of the Military Community report. SANDAG has also not verified whether the reported 12,715 jobs figure includes those occupied by personnel stationed at any of the Naval Base Coronado installations located outside City limits (e.g., San Clemente Island; Camp Michael Monsoor Mountain Warfare Training Center, La Posta; Camp Morena, La Posta and the Remote Training Site, Warner Springs, etc.). Given the integral nature of the job figures to the RHNA formula, the Board of Directors should verify their accuracy and provide a public accounting prior to adopting the draft RHNA methodology.

Moreover, SANDAG's proposed RHNA formula assigns all NASNI jobs to Coronado despite a noticeable portion of the installation being located within the municipal boundaries of the City of San Diego. The City of Coronado and the City of San Diego have long recognized the split jurisdiction condition at NASNI and entered into a subvention agreement in 1986 which, in part, requires the City of Coronado to make subvention payments to the City of San Diego for a proportionate share of federal and state funds to account for Navy personnel who reside within San Diego city limits. At a minimum, the RHNA formula should be modified to similarly allocate a fair share of NASNI's jobs to the City of San Diego.

In addition to our concerns about the improper inclusion of active duty military jobs in the RHNA formula, we also respectfully ask the Board of Directors to consider Coronado's geographic and regulatory constraints to accommodating more housing as outlined in our previous letters. It is our sincere hope that the Board of Directors will carefully consider our concerns and direct its staff to make modest adjustments to the RHNA formula to yield a more reasonable and proportionate RHHA allocation.

¹ The City of Coronado previously indicated in a September 4, 2019 letter to SANDAG that the military accounted for approximately 45% of its total jobs. This number has been revised to over 60% based on data used by SANDAG for the RHNA process.

SANDAG Board of Directors
November 20, 2019



Sincerely,

A handwritten signature in black ink, appearing to read 'R. Bailey'.

Richard Bailey
Mayor

- Attachments:
1. September 4, 2019 Letter to SANDAG
 2. October 4, 2019 Letter to HCD
 3. SANDAG April 3, 2019 Presentation to Technical Working Group (TWG)

ATTACHMENT 4



Property Within City Boundaries Owned by Outside Agencies

0 0.5 1 2 Miles



Additional City-Specific Parcel Designation Constraints



APZ, Clear Zone, and Historic Properties





RHNA Assessment Overview

