

San Diego Association of Governments Regional Housing Needs Assessment Appeals Determination: City of Coronado

The City of Coronado (City) has appealed its draft Regional Housing Needs Assessment (RHNA) allocation. The following constitutes the final determination of the San Diego Association of Governments (SANDAG) Board of Directors regarding the City's appeal. This final determination is based on the information and methodology described in California Government Code Section 65584.04,¹ the information presented in the appeal, all comments received regarding the appeal, and information received during the public hearing.

I. Statutory Background

The California Legislature developed the RHNA process in 1977 to address the affordable housing shortage in California. The RHNA process is codified in state law at Section 65580, *et seq.* Over the years the housing element laws, including the RHNA process, have been revised to address the changing housing needs in California. As of the last revision, the Legislature has declared that:

- (a) The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.
- (b) The early attainment of this goal requires the cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels.
- (c) The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.
- (d) Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.
- (e) The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.
- (f) Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article.

See Section 65580.

To carry out the policy goals above, the Legislature also codified the intent of the housing element laws:

- (a) To assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal.

¹ All statutory references are to the California Government Code unless otherwise noted.

- (b) To assure that counties and cities will prepare and implement housing elements which, along with federal and state programs, will move toward attainment of the state housing goal.
- (c) To recognize that each locality is best capable of determining what efforts are required by it to contribute to the attainment of the state housing goal, provided such a determination is compatible with the state housing goal and regional housing needs.
- (d) To ensure that each local government cooperates with other local governments in order to address regional housing needs.

See Section 65581.

The housing element laws exist within a larger planning framework which requires each city and county in California to develop and adopt a comprehensive, long-term general plan for the physical development of the jurisdiction (See Section 65300). A general plan consists of many planning elements, including an element for housing (See Section 65302). In addition to identifying and analyzing the existing and projected housing needs, the housing element must also include a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Consistent with Section 65583, adequate provision must be made for the existing and projected housing needs of all economic segments of the community.

A. RHNA Determination by HCD

Each cycle of the RHNA process begins with the California Department of Housing and Community Development's (HCD) determination of the existing and projected housing need for each region in the state (Section 65584(a)). HCD's determination must be based on population projections produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans, in consultation with each council of governments. (See Section 65584.01(a)). The RHNA Determination allocates the regional housing need among four income categories: very low, low, moderate, and above moderate.

Within 30 days of receiving the final RHNA Determination from HCD, the council of governments may file an objection to the determination with HCD. The objection must be based on HCD's failure to base its determination on either the population projection for the region established under Section 65584.01(a), or a reasonable application of the methodology and assumptions determined under Section 65584.01(b). Within 45 days of receiving the council of governments objection, HCD must "make a final written determination of the region's existing and projected housing need that includes an explanation of the information upon which the determination was made." (See Section 65584.01).

B. Development of RHNA Methodology

Each council of governments is required to develop a methodology for allocating the regional housing need to local governments within the region. The methodology must further the following objectives:

- (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.
- (2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

- (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.
- (4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.
- (5) Affirmatively furthering fair housing.

See Section 65584(b).

To the extent that sufficient data is available, the council of government must also include the following factors in development of the methodology consistent with Section 65884.04(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.
- (2) The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:
 - (A) Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.
 - (B) The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments 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, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions. The determination of available land suitable for urban development may exclude lands where the Federal Emergency Management Agency (FEMA) or the Department of Water Resources has determined that the flood management infrastructure designed to protect that land is not adequate to avoid the risk of flooding.
 - (C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis, including land zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts conversion to nonagricultural uses.
 - (D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of that jurisdiction that prohibits or restricts its conversion to nonagricultural uses.

- (3) The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.
- (4) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county and land within an unincorporated area zoned or designated for agricultural protection or preservation that is subject to a local ballot measure that was approved by the voters of the jurisdiction that prohibits or restricts conversion to nonagricultural uses.
- (5) The loss of units contained in assisted housing developments, as defined in paragraph (9) of subdivision (a) of Section 65583, that changed to non-low-income use through mortgage prepayment, subsidy contract expirations, or termination of use restrictions.
- (6) The percentage of existing households at each of the income levels listed in subdivision (e) of Section 65584 that are paying more than 30 percent and more than 50 percent of their income in rent.
- (7) The rate of overcrowding.
- (8) The housing needs of farmworkers.
- (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.
- (10) The housing needs of individuals and families experiencing homelessness. If a council of governments has surveyed each of its member jurisdictions pursuant to subdivision (b) on or before January 1, 2020, this paragraph shall apply only to the development of methodologies for the seventh and subsequent revisions of the housing element.
- (11) The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act (Chapter 7 (commencing with Section 8550) of Division 1 of Title 2), during the planning period immediately preceding the relevant revision pursuant to Section 65588 that have yet to be rebuilt or replaced at the time of the analysis.
- (12) The region's greenhouse gas emissions targets provided by the State Air Resources Board pursuant to Section 65080.
- (13) Any other factors adopted by the council of governments, that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.

To guide development of the methodology, each council of governments surveys its member jurisdictions to request, at a minimum, information regarding the factors listed above (See Section 65584.04(b)). If a survey is not conducted, however, a jurisdiction may submit information related to the factors to the council of governments before the public comment period for the draft methodology begins ((See Section 65584.04(b)(5)).

Housing element law also explicitly prohibits consideration of the following criteria in determining, or reducing, a jurisdiction's share of the regional housing need:

- (1) Any ordinance, policy, voter-approved measure, or standard of a city or county that directly or indirectly limits the number of residential building permits issued by a city or county.
- (2) Prior underproduction of housing in a city or county from the previous regional housing need allocation, as determined by each jurisdiction's annual production report.

- (3) Stable population numbers in a city or county from the previous regional housing needs cycle.

See Section 65584.04(g).

Finally, Section 65584.04(m) requires that the final RHNA Plan, which includes both the methodology and the allocation, is consistent with the development pattern included in the region's sustainable communities strategy, distributes the entire regional housing need determined under Section 65584, distributes units for low- and very low income households to each jurisdiction in the region, and furthers the five objectives listed in Section 65584(d).

C. Public Participation

Government Code Section 65584.04(d) states that "public participation and access shall be required in the development of the methodology." The council of governments is required to "explain in writing how each of the factors described in subdivision (e) was incorporated into the methodology and how the methodology furthers the objectives listed in subdivision (d) of Section 65584" (See Section 65584.04(f)) as well as explain "how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology" (See Section 65584.04(d)). The proposed methodology, "this information, and any other supporting materials used in determining the methodology, shall be posted on the council of governments' or delegate subregion's, internet website." (See Section 65584.04(f)).

The council of governments is required to open the proposed methodology to public comment and "conduct at least one public hearing to receive oral and written comments on the proposed methodology." (See Section 65584.04(d)). Following the conclusion of the public comment period and after making any revisions deemed appropriate by the council of governments as a result of comments received during the public comment period and consultation with the HCD, the council of governments publishes the proposed methodology on its website and submits it, along with the supporting materials, to HCD. (See Section 65584.04(h)).

D. HCD Review of Methodology and Adoption by Council of Governments

HCD has 60 days to review the proposed methodology and report its written findings to the council of governments. The written findings must include a determination by HCD as to "whether the methodology furthers the objectives listed in subdivision (d) of Section 65584." (See Section 65584.04(i)). If HCD finds that the proposed methodology is not consistent with the statutory objectives, the council of governments must take one of the following actions: (1) revise the methodology to further the objectives in state law and adopt a final methodology; or (2) adopt the methodology without revisions "and include within its resolution of adoption findings, supported by substantial evidence, as to why the council of governments, or delegate subregion, believes that the methodology furthers the objectives listed in subdivision (d) of Section 65584 despite the findings of [HCD]." (See Section 65584.04(i)). Upon adoption of the final methodology, the council of governments "shall provide notice of the adoption of the methodology to the jurisdictions within the region, or delegate subregion, as applicable, and to HCD, and shall publish the adopted allocation methodology, along with its resolution and any adopted written findings, on its internet website." (See Section 65584.04(k)).

E. RHNA Draft Allocation, Appeals, and Adoption of Final RHNA Plan

Based on the adopted methodology, each council of governments shall distribute a draft allocation of regional housing needs to each local government in the region and HCD, and shall publish the draft allocation on its website. (See Section 65584.05(a)). Upon completion of the appeals process,

discussed in more detail below, each council of governments must adopt a final regional housing need allocation plan and submit it to HCD (See Section 65584.05(g)). HCD has 30 days to review the final allocation plan and determine if it is consistent with the regional housing need developed pursuant to Section 65584.01. The resolution approving the final housing need allocation plan shall demonstrate that the plan is consistent with the SCS and furthers the objectives listed in Section 65584(d) as discussed above. (See Section 65584.04(m)(3); Section 65584.045).

II. SANDAG Oversight of the 6th Cycle RHNA Process

A. RHNA Determination

SANDAG began consultation with HCD for the 6th Cycle RHNA process in April 2017. The consultation process included a review of HCD's calculations and data sources and presentations to the Regional Planning Technical Working Group (TWG)², Regional Planning Committee (RPC)³, and the Board⁴.

In March 2018, SANDAG received a draft RHNA Determination from HCD. Consistent with Section 65584.01, HCD used the following data to prepare the draft RHNA Determination for the San Diego region:

- Population forecast from the California Department of Finance (DOF)
- Projected number of new households formed
- Vacancy rate in existing housing stock
- Percentage of renter's households that are overcrowded, defined as more than one person per room per dwelling unit
- Housing replacement needs

At its meeting on [May 4, 2018](#), the RPC considered potential changes to the draft RHNA Determination that could be proposed to HCD reflecting factors unique to housing in the San Diego region. The RPC recommended that the Board accept the draft RHNA Determination without modifications.

At its [May 11, 2018](#), meeting, the Board authorized the Executive Director to submit comments to HCD outlining suggested revisions to the RHNA Determination. Then on May 25, 2018, the Board voted to place this item on a future agenda for further discussion before submitting comments to HCD. On [June 8, 2018](#), the Board amended its May 11, 2018, action and directed staff to submit a letter to HCD accepting the draft RHNA Determination. Following [SANDAG's acceptance](#) of the draft RHNA Determination, the consultation process concluded when HCD submitted the final RHNA Determination in a [letter to SANDAG dated July 5, 2018](#).

The final RHNA Determination requires SANDAG and its member agencies to plan for 171,685 total housing units through the 2021-2029 planning period to address the region's housing needs.

² SANDAG staff presented information related to the RHNA Determination to the TWG at its [March 26, 2018](#), and [April 12, 2018](#), meetings.

³ SANDAG staff presented information related to the RHNA Determination to the RPC at its [April 6, 2018](#), and [May 4, 2018](#), meetings.

⁴ SANDAG staff presented information related to the RHNA Determination to the Board at its [March 9, 2018](#), [May 11, 2018](#), and [June 8, 2018](#), meetings.

B. RHNA Methodology and Public Participation

At its [September 14, 2018](#) meeting the Board was surveyed to determine each jurisdiction's priorities for the upcoming RHNA cycle, including which RHNA objectives and factors would be most important when determining the distribution of housing units in the region. The Board expressed a desire to take a different approach than what had been used in previous housing element cycles and wanted to play a bigger role in the development of the methodology. This culminated in the formation of the RHNA Subcommittee in December 2018, which included members of the Board from each SANDAG subregion to reflect the diversity of geography, jurisdiction size, and other attributes of member jurisdictions. The Board also requested that their initial set of priorities be further discussed by the Regional Planning Technical Working Group (TWG), which consists of the planning or community development director from each jurisdiction, among other members.

The RHNA Subcommittee began meeting in early 2019. To develop its recommendation to the Board, the RHNA Subcommittee explored options for how to build consensus around a methodology that complies with state law while best achieving the goals of the Board. The RHNA Subcommittee held six meetings⁵ in spring and summer 2019, prior to the Board's release of the draft methodology for public comment. All meetings were noticed and open to the public.

SANDAG staff also solicited input on the development of the methodology from the TWG, whose membership is described above. The TWG advises the RPC and Board on the development and implementation of San Diego Forward: the Regional Plan, which includes the RHNA Plan. The TWG discussed and provided input on the development of the methodology over 12 meetings⁶ from August 2018 to November 2019, including two workshops specifically focused on RHNA.

Attendees at the meetings of the Board, RHNA Subcommittee, RPC, and TWG provided information regarding the types of data SANDAG should use, assumptions that should be made, as well as information regarding conditions in individual jurisdictions that should be taken into consideration. Jurisdictions and stakeholders also provided written comments during the outreach process. In addition to addressing comments at public meetings, SANDAG staff responded to comments and questions related to the development of the methodology via phone calls and emails, which led to the creation of Frequently Asked Questions that were posted to the SANDAG website. Staff also presented at city council meetings upon request.

On [July 26, 2019](#), the Board released the draft methodology for public comment. At the end of a 42-day public comment period, SANDAG conducted a public hearing on [September 6, 2019](#). SANDAG received nearly 2,200 [public comments](#). During the public comment period, SANDAG compiled and posted on its website [supplemental information](#) requested by Board members, a list of [Frequently Asked Questions \(FAQs\)](#), and a [response to comments received during the public comment period](#).

On September 6, 2019, the Board authorized staff to submit the draft methodology to HCD for review. In a [letter dated November 1, 2019](#), HCD found that the draft methodology furthers the objectives in state law. At its November 22, 2019, meeting, the Board adopted by [resolution](#) the [final methodology](#) and released the [draft allocation](#). Following the Board meeting, the draft allocation was posted on the SANDAG website and distributed to each jurisdiction and HCD.

⁵ The RHNA Subcommittee met on [February 8, 2019](#), [February 22, 2019](#), [March 22, 2019](#), [April 26, 2019](#), [May 24, 2019](#), and [June 14, 2019](#).

⁶ The TWG discussed RHNA at the following meetings: [August 9, 2018](#), [October 11, 2018](#), [December 13, 2018](#), [January 10, 2019](#), [February 14, 2019](#), [March 14, 2019](#), [April 3, 2019](#), [May 9, 2019](#), [June 6, 2019](#), [June 13, 2019](#), [June 27, 2019](#), and [November 14, 2019](#).

III. RHNA Appeal Process

A. Statutory Background

Under Section 65584.05(b), a local government or HCD may appeal the council of governments within 45 days following receipt of the draft allocation “for a revision of the share of the regional housing need proposed to be allocated to one or more local governments.” Appeals “shall be based upon comparable data available for all affected jurisdictions and accepted planning methodology, and supported by adequate documentation, and shall include a statement as to why the revision is necessary to further the intent of the objectives listed in subdivision (d) of Section 65584.” Appeals also shall be consistent with the sustainable communities strategy included in the regional transportation plan (See Section 65584.05(b)). In accordance with Section 65584.05(b), appeals are limited to the following circumstances:

- (1) The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.
- (2) The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.
- (3) A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.

Following the 45-day period for filing an appeal, the council of governments “shall notify all other local governments within the region or delegate subregion and the department of all appeals and shall make all materials submitted in support of each appeal available on a publicly available internet website.” (See Section 65584.05(c)). Local governments and HCD may, within 45 days, comment on one or more appeals.

Within 30 days of the end of the appeals comment period, and with at least 21 days prior notice, the council of governments “shall conduct one public hearing to consider all appeals filed pursuant to subdivision (b) and all comments received pursuant to subdivision (c).” (See Section 65584.05(d)). Within 45 days of the public hearing to consider appeals, the council of governments is required to make a written final determination for each appeal filed that either accepts, rejects, or modifies the appeal and issue a proposed final allocation plan (See Section 65584.05(e)). The written finding(s) must describe how the determination is consistent with Section 65584.05.

If a final determination on an appeal requires the council of governments to adjust the allocation to one or more local governments that are not the subject of an appeal, Section 65584.05(f) provides: (1) if the adjustment totals 7 percent or less of the regional housing need, the council of governments must redistribute those housing units proportionally to all local jurisdictions; or (2) if the adjustment totals more than 7 percent of the regional housing need, then the council of governments shall develop a methodology to distribute the amount greater than the 7 percent to local governments. The total distribution of housing need shall not equal less than the regional housing need established under Section 65584.01. (See Section 65584.05(f))

Within 45 days after issuing the proposed final allocation plan, the council of governments “shall hold a public hearing to adopt a final allocation plan.” The council of governments must then submit the final allocation plan to HCD within 3 days of adoption. HCD has 30 days to determine if the final allocation plan is consistent with the regional housing need. (See Section 65584.05(g)). The council

of governments has final authority to determine the distribution of the region’s housing needs “[t]o the extent that the final allocation plan fully allocates the regional share of statewide housing need, as determined pursuant to Section 65584.01 and has taken into account all appeals.” (See Section 65584.05(g)). HCD may revise the determination of the council of governments to obtain consistency with the existing and projected housing need for the region. (See Section 65584.05(g)).

B. SANDAG Appeal Process

SANDAG received four appeals during the appeals period of November 22, 2019 to January 6, 2020. Following close of business on January 6, 2020, the appeals were posted on [SANDAG's website](#) and distributed to the planning or community development directors of each local jurisdiction and the Board consistent with Section 65584.05(c).

SANDAG received five comment letters on the appeals during the appeals comment period from January 7, 2020 to February 21, 2020.

On February 7, 2020, SANDAG issued a notice of public hearing to consider appeals and comments on appeals at a meeting of the Board on February 28, 2020, pursuant to Section 65584.05(d), which was posted on the SANDAG website and published in two local newspapers. The Executive Committee, a committee of the Board responsible for setting Board agendas and providing direction to staff in preparing items for Board consideration, was scheduled to consider proposed RHNA Appeals Hearing Procedures at its meeting on [February 14, 2020](#). Prior to the Executive Committee meeting, three of the appealing jurisdictions submitted letters to SANDAG stating that individual notice of the proposed public hearing was not received 21 days in advance of the February 28, 2020, public hearing date. To ensure compliance with the requirements of Section 65584.05(d), at its February 14, 2020, meeting, the Executive Committee approved continuing the public hearing to March 27, 2020, in addition to approving the RHNA Appeals Hearing Procedures with modifications. At its meeting on February 28, 2020, the Board ratified the Executive Committee’s actions.

On March 3, 2020, SANDAG issued a notice of the public hearing to consider appeals and comments on appeals on March 27, 2020, pursuant to Section 65584.05(d), which was provided to each jurisdiction, posted on SANDAG’s website, and published in two local newspapers.

The Board conducted the public hearing at its meeting on [March 27, 2020](#).

IV. The City’s Appeal

In a letter dated January 6, 2020, the City appealed the draft allocation. The grounds for appeal are as follows:

- (1) SANDAG failed to adequately consider the information submitted pursuant to Government Code Section 65584(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, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in Government Code Section 65584(d).

A. Statutory Factors Under 65584.04(e)

1. Section 65584.04(e)(1): Jobs-Housing Relationship

Section 65584.04(e)(1) states:

To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate

subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:

(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.

As described above, pursuant to Section 65584.04, SANDAG has been charged with developing the RHNA methodology in consultation with HCD. SANDAG has the discretion to develop this methodology so long as it meets all the procedural requirements under Section 65584, *et seq.*, and the methodology furthers the objectives in Section 65584(d) as ultimately determined by HCD. In compliance with the RHNA statute, SANDAG carefully developed its methodology with input from HCD and local jurisdictions.

The City asserts that the draft allocation is deficient because SANDAG failed to adequately consider military housing during the development of the methodology. Contrary to the City's assertions, SANDAG did in fact give due consideration to the issue of the military housing raised by the City. In the development of the methodology, members of the RHNA Subcommittee and the TWG participated in substantive discussion considering the exclusion of active duty military from the jobs data at the following noticed public meetings:

- [April 3, 2019, TWG Meeting](#) - Two committee members requested evaluating the impact on using data for civilian jobs as opposed to military jobs. Two other working group members discussed the jobs data source.
- [April 26, 2019, RHNA Subcommittee Meeting](#) - Three subcommittee members discussed whether to exclude active duty military jobs from total jobs count.
- [May 9, 2019, TWG Meeting](#) - Three working group members discussed whether to exclude active duty military jobs from total jobs count.
- [June 6, 2019, TWG Meeting](#) - One working group member discussed whether to exclude active duty military jobs.

Additionally, at the following noticed public meetings, members of the Board, the RHNA Subcommittee, and the TWG participated in substantive discussion considering reducing a jurisdiction's jobs count by the number of on-base military housing units within its jurisdiction, which became known as a "housed military adjustment":

- [May 24, 2019, RHNA Subcommittee Meeting](#) - Seven subcommittee members and one additional elected official discussed a potential of using a housed military adjustment.
- [June 6, 2019, TWG Meeting](#) - One working group member discussed a potential of using a housed military adjustment.
- [June 14, 2019, RHNA Subcommittee Meeting](#) - Six subcommittee members discussed the housed military adjustment for over 1 hour; the RHNA Subcommittee voted to recommend a methodology with the housed military adjustment to the Board.
- [June 27, 2019, TWG Meeting](#) - Four working group members discussed the housed military adjustment.
- [July 26, 2019, Board Meeting](#) - One public speaker and nine Board members discussed the housed military adjustment.

- [September 6, 2019, Board Meeting](#) – Two public speakers and three Board members discussed the housed military adjustment.

In fact, the City's own appeal demonstrates that SANDAG considered the housed military adjustment at length. As noted in the City's appeal, the Board rejected the draft methodology recommended to the Board by the RHNA Subcommittee that incorporated the housed military adjustment. At its July 26, 2019, meeting where the RHNA Subcommittee's recommendation was considered, the Board discussed the housed military adjustment for approximately 30 minutes during its 2-hour consideration of the draft methodology before voting to release a draft for public comment that did not include the adjustment.

As several Board members noted, every jurisdiction in the region could identify carve outs from the methodology to address the unique circumstances facing their communities: "Each and every one of us across this table could come up with valid reason[s] why we – there should be some carve out or cut out for our region or area. I can think of, as the councilmember of District 4, about 5 reasons in my own district and there are 9 districts in the City [of San Diego] and so with that I think we are, we would be approving what could potentially be a slippery slope and from a technical standpoint don't think we should do that." (Board meeting on July 26, 2019 (1:37:10 in meeting audio)).

On September 6, 2019, the Board again considered the housed military adjustment in the context of carve outs for individual jurisdictions during its public hearing on the draft methodology and voted to submit the methodology without the housed military adjustment to HCD for review. Approximately 30 minutes were dedicated to robust discussion around the merits of submitting a draft methodology without carve outs for individual jurisdictions that would dilute the guiding principles of collocating housing near the region's jobs and established transit infrastructure to reduce vehicle miles traveled and greenhouse gas emissions.

Ultimately, in its discretion, the Board adopted a final methodology that did not include the housed military adjustment. Nuanced adjustments that may have modified the methodology in marginal ways in relation to the overall objectives and factors would likely result in a similar allocation because units being shifted away from one jurisdiction must necessarily be shifted toward others. At the close of the process, the Board was concerned that the methodology would be consumed by the 19 jurisdictions' "rational" exceptions based on unique community characteristics and the objectives identified by state law would be no better served.

As demonstrated above, the Board adequately considered both the exclusion of active duty military from the jobs data and the housed military adjustment and adopted the Final Methodology prioritizing jurisdictions' share of transit and jobs to allocate the region's housing needs in furtherance of the objectives listed in Section 65584.

The City also asserts that the jobs data used in the methodology has not been verified and points out that at a July 26, 2019, meeting, Joe Stuyvesant from the Navy had different military housing data. Specific to the housing data, prior to release of the draft methodology for public comment, SANDAG staff worked closely with members of the Naval Facilities Engineering Command (NAVFAC) Southwest to gather and verify military housing data. After the July 26, 2019, meeting of the Board, NAVFAC staff were again consulted concerning the military housing data and confirmed that the housing data used in the draft methodology recommended by the RHNA Subcommittee was accurate. While there is some off-base military housing associated with Naval Base Coronado in other jurisdictions, the off-base military housing was not used in the housed military adjustment proposed by the RHNA Subcommittee because the housing is not restricted to military personnel from Naval Base Coronado installations. Residents of off-base housing may

be employed at any of the military installations in the region. Because the Board voted for a final methodology which did not include an adjustment for housed military, the military housing data is not used in the draft allocation.

With respect to the jobs data, in defining the data sources available during the development of the methodology, SANDAG performed extensive stakeholder outreach. The data source for the jobs component of the methodology is the SANDAG Employment Estimates, which are also being used to develop the latest Regional Growth Forecast. SANDAG Employment Estimates are derived from Quarterly Census of Employment and Wages (QCEW) data from the Economic Development Department (EDD) and the Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics (LODES) data from the Center for Economic Studies at the U.S. Census Bureau.

The LODES data combines federal, state, and Census Bureau survey data on employers and employees. SANDAG uses the QCEW dataset for its detailed geographic information on businesses to geolocate “job spaces” throughout the region. The LODES data (average of the last five years), which are available at the census block level, are used to fill the job spaces to determine total jobs within various geographies. SANDAG Employment Estimates are also supplemented by other data sources including the San Diego Military Advisory Council (SDMAC) and Defense Manpower Data Center (DMDC). Finally, the jobs data are validated against published job totals for the County from the EDD Labor Market Information’s yearly data.

Specific to the military jobs data, the DMDC produces an annual demographic report on the military population, which includes a breakdown of active duty military personnel by installation in the United States. Of the multiple installations that form Naval Base Coronado, only Naval Air Station North Island (NASNI) and Coronado Naval Amphibious Base (NAB) are included in the report with associated personnel data. The report notes that bases with fewer than 100 active duty personnel are not individually reported and are instead rolled up into an “other” category for the relevant state. SANDAG used the active duty personnel data for NASNI and NAB in the calculation to determine the City’s total jobs. SANDAG confirmed with NAVFAC that active duty personnel data for NASNI and NAB do not include data for any other installation comprising Naval Base Coronado that may lie outside the City’s jurisdictional boundaries. During this subsequent discussion with NAVFAC, however, it became clear that the jobs data for the Silver Strand Training Complex, located in the City, was not aligned with the DMDC.⁷ For this reason, the City’s total jobs figure is reduced by 175 jobs and the allocation in the proposed final RHNA Plan corrected accordingly.⁸

The City also argues that its share of the regional housing need was not determined in accordance with the methodology because all military jobs (active duty personnel and civilian Department of Defense jobs) associated with NASNI have been erroneously assigned to the City.

⁷ The Silver Strand Training Complex (SSTC) has at most 99 active duty military jobs. Similarly, Naval Outlying Landing Field (NOLF) in the City of Imperial Beach also has at most 99 active duty military jobs according to the DMDC data. The total jobs data had erroneously treated both the SSTC and NOLF as remote stations of Naval Base San Diego at 32nd Street and redistributed a portion of the jobs at the 32nd Street installation located in the City of San Diego to SSTC and NOLF. As such, the jobs previously assigned to these two installations will be properly attributed to the City of San Diego as part of the 32nd Street installation.

⁸ The total jobs count for the City of Imperial Beach and the City of San Diego will also be corrected in the proposed final RHNA Plan.

The City asserts that a portion of NASNI is located in the City of San Diego and “the proposed allocation does not allocate any NASNI jobs to the City of San Diego.” (City’s Appeal, p. 2). While assigning all jobs attributed to NASNI may be consistent with the approach used for Naval Base San Diego 32nd Street,⁹ after further analysis, the City’s requested revision is consistent with a plain reading of the final methodology. Therefore, the City’s total jobs count is reduced by an additional 2,270 and the allocation in the proposed final RHNA Plan corrected accordingly.¹⁰

2. Section 65584.04(e)(2): Opportunities and Constraints to Development

The City argues that the draft RHNA allocation fails to adequately account for its unique constraints to development and submits the following documentation in support of its claim.

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
Visitors Serving Hotel/Motel Zone	49
Parks and Designated Open Spaces	297
TOTAL	764 Acres (1.2 square-miles)

City’s Appeal, p. 4

However, 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, but shall consider the potential for increased residential development under the alternative zoning ordinances and land use restrictions.” (See Section 65584.04 (e)(2)(B)). In fact, HCD noted in its [letter dated November 1, 2019 \(p. 1-2\)](#) 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.” Because consideration of existing zoning ordinances and land use restrictions is specifically prohibited by state law, the facts raised by the City do not support this ground for appeal.

⁹ Naval Base San Diego 32nd Street installation is the only other military installation in the region which exists across jurisdictional boundaries. For the 32nd Street base, the division of jobs between the City of San Diego and the City of National City was based on the share of traffic passing through each of the installation’s security gates as determined from a 2015 military gate count survey conducted by SANDAG to inform updates to the SANDAG Activity Based Model. Based on these comparable data for the other affected jurisdictions, the division of jobs associated with NASNI was determined consistent because all access to NASNI is within the City of Coronado.

¹⁰ Approximately 80.5 percent of the land area of NASNI is within the City and 19.5 percent is within the City of San Diego. The jobs at NASNI (7,223 active duty personnel and 4,417 civilian Department of Defense jobs) have been reassigned to the City and the City of San Diego proportionate to the share of land area within each jurisdiction. Therefore, the City’s jobs count is reduced by the 2,270 jobs at NASNI that have been reassigned to the City of San Diego.

The City also argues that planning for the housing units in the draft allocation would require the City to violate the Coastal Act, or alternatively, to significantly overhaul the City's certified Local Coastal Program. As mentioned above, 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, but shall consider the potential for increased residential development under the alternative zoning ordinances and land use restrictions." (See Section 65584.04 (e)(2)(B)).

Additionally, the Coastal Commission recently commented on the City's assertion in the San Diego Union Tribune¹¹:

In a statement, Coastal Commission Executive Director Jack Ainsworth said that while there are some constraints in the coastal zone related to increases in housing density around areas vulnerable to sea level rise and erosion, that doesn't mean that there are not areas within the coastal zone where significant increases in housing density are possible.

"To make a blanket statement that the Coastal Commission would not approve increases in housing density is simply not accurate," he wrote. "Over the past year or so, the Commission has demonstrated our commitment to increasing housing density through individual permitting actions and our local coastal program planning efforts with local governments."

While the legislative priorities under the Coastal Act may be different from the state law governing RHNA, this can be said about other statutory schemes affecting local land use. Consistent with past cycles of RHNA, a jurisdiction wholly or partly in the coastal zone must work with the Coastal Commission when updating the housing element in its general plan.

In addition, the City has failed to submit a specific revision to the allocation based on their Local Coastal Program. Because a specific revision was not submitted, SANDAG cannot determine whether this request is based on comparable data for all affected jurisdictions and accepted planning methodology, or whether the revision would be necessary to further the intent of the statutory objectives.

3. Section 65584.04(e)(9): Housing Needs of Universities and Colleges

The City asserts that Section 65584.04(e)(9) requires SANDAG to consider the housing needs of colleges and universities "as a separate factor or an adjustment in the allocations." (City's Appeal, p. 5). State law makes no such mandate. Rather, it states:

- (e) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:

...

¹¹ "San Diego County cities push back on state-mandated housing goals." San Diego Union Tribune, January 14, 2020 (<https://www.sandiegouniontribune.com/business/growth-development/story/2020-01-14/sandag-housing>).

(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.

On page 18, the Final Methodology specifically describes the data and assumptions included to develop the methodology that consider the housing needs generated by a private university or campus of the California State University or the University of California. Because the major universities and community colleges in the San Diego region are located in urban areas served by the existing transportation network, prioritizing transit in the methodology encourages housing development near existing transit facilities serving these key destinations. The City of San Diego is home to San Diego State University; University of California San Diego; University of San Diego; Point Loma Nazarene University; various smaller, private universities; and three community colleges: San Diego City College, San Diego Mesa College, and San Diego Miramar College. It also has the greatest share of the region's transportation system in part because of transportation investments near universities and colleges located within its jurisdiction. Similarly, the cities of Chula Vista (Southwestern Community College), El Cajon (Cuyamaca College), Oceanside (Mira Costa College), and San Marcos (California State University San Marcos and Palomar College) have made transportation investments to improve access to transit near colleges and universities.

Additionally, the methodology includes a jobs component in furtherance of promoting an improved intraregional relationship between jobs and housing consistent with Section 65584(d)(3). The major universities in the region are also key employers and jobs associated with those institutions are included in the methodology. As such, both the transit and jobs components address the housing needs generated by students, faculty, and staff at private universities and campuses of the California State University or the University of California within each affected jurisdiction.

Importantly, the City has failed to submit a specific revision to the allocation or any supporting documentation or alternative data concerning the housing needs of universities and colleges within the region. Because a specific revision was not requested and no documentation was submitted, SANDAG cannot determine whether this request is based on comparable data for all affected jurisdictions and accepted planning methodology, and cannot determine whether the revision is necessary to further the statutory objectives.

4. [Section 65584.04\(e\)\(12\)](#)¹²: [Other Factors and Furtherance of Statutory Objectives](#)
The City asserts that "SANDAG could have adopted [a methodology] over any HCD objection under Government Code Section 65584.04(i)(2)." (City's Appeal, p. 6). The City's argument based on Section 65584.04(e)(12) is premised on an erroneous statement of facts and interpretation of law. By ending its analysis of HCD's RHNA oversight at Section 65584.04, the City fails to recognize the import of recent statutory changes to the housing laws. Effective January 1, 2019, following adoption of a final methodology not only may local jurisdictions appeal the draft allocation, but also HCD "may appeal to the council of governments or the delegate subregion for a revision of the share of the regional housing need proposed to be allocated to one or more local governments" (Section 65584.05(b)). In fact, SANDAG has final authority to determine the distribution of the region's housing need only to the extent it has allocated the entire regional share of the statewide housing need, and "has taken into account all appeals." HCD, notably, "may revise the determination of the council of governments if

¹² This subsection is now at Section 65584.04(e)(13) following revisions to the law effective January 1, 2020.

necessary to obtain” consistency with the existing and projected housing need for the region (Section 65584.05(g)).

The City also asserts that “[t]he 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” (City Appeal, p. 6). First, SANDAG did not adopt any other factors under Section 65584.04(e)(12). Furthermore, the City’s assertion based on Section 65584.04(e)(12) again is premised on an erroneous statement of facts and interpretation of law. Section 65584.04(e)(12) in its current form did not exist in prior RHNA cycles; the Legislature substantively amended this section of state law effective January 1, 2019, as illustrated below by the language in bold:

(12) Any other factors adopted by the council of governments, **that further the objectives listed in subdivision (d) of Section 65584, provided that the council of governments specifies which of the objectives each additional factor is necessary to further. The council of governments may include additional factors unrelated to furthering the objectives listed in subdivision (d) of Section 65584 so long as the additional factors do not undermine the objectives listed in subdivision (d) of Section 65584 and are applied equally across all household income levels as described in subdivision (f) of Section 65584 and the council of governments makes a finding that the factor is necessary to address significant health and safety conditions.**

To state that prior cycle factors could be incorporated into this RHNA cycle by virtue of their success in the past ignores the *current* language of Section 65584.04(e)(12). To the extent the City is requesting to modify the draft allocation by incorporating unidentified, prior cycle factors, this request is necessarily deficient because it has not provided adequate supporting documentation and SANDAG cannot determine whether it is based on comparable data for all affected jurisdictions or accepted planning methodology. In addition, the City has not provided any statement as to why the revision is necessary to further the intent of the objectives in state law (Section 65584.05(b)).

The City asserts that SANDAG did not adequately consider “the desire of other member agencies to absorb additional units that cannot be accommodated in jurisdictions like Coronado.” (City’s Appeal, p. 6).

At its September 14, 2018, meeting, 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. Notwithstanding, members of the RHNA Subcommittee and the Board discussed the concept of trading housing units among jurisdictions at the following noticed public meetings:

- [June 14, 2019, RHNA Subcommittee Meeting](#) – Three Board members discussed trading housing units among jurisdictions
- [November 22, 2019, Board Meeting](#) – One Board member discussed taking on housing units from other jurisdictions.

As one RHNA Subcommittee member noted, “[i]n the perfect world, where we didn’t need to have a methodology that made sense, I would say ‘Sure, I’ll take 500 of your units [...] because Coronado’s unique’ but we can’t do that because it would ruin the integrity of our methodology.” (RHNA Subcommittee meeting on June 14, 2019 (0:54:29 in meeting audio)).

Furthermore, the City has not provided adequate documentation supporting this request. SANDAG cannot determine whether it is based upon comparable data available for all affected jurisdictions or accepted planning methodology. The City has also failed to demonstrate that an adjustment to the allocation to accommodate other jurisdictions' willingness to "absorb additional units" is necessary to further the intent of the statutory objectives.

In support of its assertions above, the City also cites to the increase in units proposed to be allocated in the 6th Cycle compared to the 5th Cycle as evidence of a defective draft allocation; however, the increase is a direct reflection of the refocused state priorities in the area of housing. In 2018 and 2019, the Legislature enacted major changes to the housing laws affecting RHNA. Specifically, the Legislature determined that "insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals." See Section 65584(a)(3). The final methodology does just that by prioritizing access to transit and jobs as determinants of the draft allocation.

In an attachment to the City's appeal, it also states that it supports the small cities adjustment as proposed by the City of Solana Beach at the September 6, 2019, meeting of the Board. To the extent the City is also requesting that the draft allocation be modified consistent with the small cities adjustment, SANDAG adequately considered the request from the City of Solana Beach. Several SANDAG Board members requested staff apply a methodology that recognizes challenges for small cities by potentially reducing the number of housing units based on the population of the jurisdiction. The proposed small cities adjustment was considered in several comment letters during the public comment period and also discussed at the following public meetings:

- (1) [July 26, 2019, Board Meeting](#) – Two board members discussed the potential for a small cities adjustment.
- (2) [September 6, 2019, Board Meeting](#) – Eight board members discussed the potential for a small cities adjustment.

SANDAG staff also consulted with HCD¹³ on the potential for small cities to receive a reduced allocation. HCD did not support an adjustment based on the population of a city rather than based on the objectives in state law. Ultimately, the Board voted not to include the small cities adjustment in the final methodology.

B. Statutory Objectives Under Section 65584(d)

1. Section 65584(d)(1): Increasing the Housing Supply
Section 65584(d)(1) states:

The regional housing needs allocation plan shall further all of the following objectives:

¹³ Section 65584.04(h) states that the methodology must be published on SANDAG's website and submitted to HCD after making revisions resulting from comments received during the public comment period and "as a result of consultation with [HCD]."

(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 City argues that the draft allocation does not assign housing units in an equitable manner because the significant increase in the City's housing unit allocation through the 5th Cycle as compared to the 6th Cycle is disproportionately higher than the increase in housing unit allocation for other jurisdictions in the region. The 5th Cycle, however, used a completely different methodology based on general plan capacities. In contrast, the 6th Cycle methodology and its draft allocation address the statutory objectives set forth by the Legislature by encouraging housing development near jobs and transit, which will provide the region's residents with opportunities to live where they work and readily access transit.

Consistent with this statutory objective, the draft allocation distributes housing units in all four income categories to each of the region's 19 jurisdictions. The draft allocation does so equitably by ensuring each jurisdiction receives an allocation for low- and very low income units, and further, allocating a higher share of low- and very low income units to jurisdictions that currently have a smaller share of low- and very low income households than the regional share. Because state law requires jurisdictions to zone at higher densities to accommodate their low- and very low income housing unit allocations, the mix of housing types will also increase.

The City also asserts that the draft allocation erroneously assigns all jobs associated with NASNI to the City of Coronado. As discussed in more detail above, the City's total jobs count is being reduced and the allocation in the proposed final RHNA Plan corrected accordingly.

2. Section 65584(d)(3): Intra-regional Jobs-Housing Relationship

Section 65584(d)(3) requires that the RHNA Plan further the following objective:

(3) Promoting an improved intra-regional 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 City asserts that "most active duty military personnel already have government funded housing." (City's Appeal, p. 6). The revised jobs data, as described above, indicates there are 11,132 active duty military jobs in the City. Based on data from NAVFAC Southwest, there are 5,806 barracks units and 54 family housing units on NASNI and 43 family housing units on Naval Amphibious Base Coronado for a total of 5,903 military housing units located in the City. If one active duty military job were attributed to one on-base housing unit, this still leaves more than half (53%) of the active duty military personnel without available housing on-base. The City has not provided differing military jobs or housing data.

The City also asserts that "construction of new housing in Coronado will not promote an improved intra-regional relationship between jobs and housing" because "people who enlist in the Navy cannot choose where they wish to be stationed or deployed." (City's Appeal, p. 6). It is unclear how this contention supports the City's assertion. Active duty personnel stationed at a Coronado installation who do not benefit from on-base housing must choose to live somewhere else. Even the City's representative on the RHNA Subcommittee identified the issue of housing for military personnel: "If our objective is to really provide workforce-type housing, and you look at those military jobs . . . if you're looking at Coronado or Imperial Beach . . . you could add 2,000 more homes to Coronado, the average sailor is not going to be able to afford those." (RHNA Subcommittee Meeting on May 24, 2019 (0:46:27 in meeting audio). It is for that

very reason that construction of new very low, low, and moderate income housing to accommodate those jobs would increase the housing supply and promote an improved intraregional relationship between jobs and housing, thereby reducing the need to drive longer distances to work in furtherance of the state’s environmental goals. As such, the City has failed to demonstrate that adjusting the allocation by excluding active duty military jobs from the total jobs data is necessary to further the intent of the statutory objectives.

C. Significant and Unforeseen Change in Circumstances

The City also submitted letters during the appeals comment period requesting that SANDAG consider a new California Department of Finance (DOF) population projection released in January 2020. A prior DOF population projection was used by HCD in developing the RHNA Determination. On February 6, 2020, SANDAG staff discussed the new DOF population projection with HCD to determine how it might affect the 6th Cycle RHNA. HCD stated that the RHNA statutes do not provide a process for revising a RHNA Determination once it is final. Section 65584.01(a) provides that “[t]he department’s determination shall be based upon population projections produced by the Department of Finance and regional population forecasts used in preparing regional transportation plans, in consultation with each council of governments.” The RHNA Determination is produced by HCD based on the data available during the consultation process pursuant to Section 65584.01 and is not revised for either increased or decreased population estimates subsequently released. As such, SANDAG finds that the new DOF population projection does not constitute a “significant or unforeseen change in circumstances [that] has occurred in the local jurisdiction or jurisdictions . . .” See Section 65584.05(b)(3).

V. Conclusion

The City requests that SANDAG modify the draft allocation by excluding active duty military jobs in the City’s jobs count and either (1) redistribute the units allocated to those jobs on a regional basis, or (2) redistribute the units allocated to those jobs to other member cities that have unmet housing capacity from past housing element update cycles¹⁴. While not specifically included in the paragraph titled “The City’s Allocation Request” on page 7 of the City’s appeal, SANDAG also has considered the City’s requests to (a) exclude housed military from the jobs data, (b) reassign jobs attributed to the City of Coronado to the City of San Diego, (c) adjust the allocation to accommodate the City’s existing zoning and Local Coastal Program, (d) adjust the allocation to accommodate units for cities with college and university campuses, and (e) adjust the allocation to reflect other jurisdictions’ willingness to absorb additional units.

Based on the discussion above, SANDAG (1) modifies the City’s allocation based on a correction to the jobs data attributed to NASNI and the SSTC finding that the revision is necessary to further the objectives listed in Section 65584(d), and (2) finds that the remaining revisions requested are not necessary to further the objectives listed in Section 65584(d) and rejects the remaining requests for a revised share of the regional housing need in the City’s appeal. Based on the reduction of 2,445 jobs from the City’s total jobs count, the City’s allocation is adjusted as follows:

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

¹⁴ It is important to note that Section 65584.04(g) prohibits SANDAG from considering prior underproduction of housing in a city or county from the previous regional housing need allocation in determining a jurisdiction’s share of the regional housing need.

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