City of Encinitas

VIA OVERNIGHT DELIVERY

September 10, 2015

Mr. Glen Campora
Division of Housing Policy Development
California Department of Housing and Community Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

2013-2021 Housing Element 2nd DRAFT Submittal

Mr. Campora:

Thank you for the thorough and thoughtful review comments in HCD's July 3, 2015 letter, along with productive discussions with Ms. Robin Huntley, HCD's staff reviewer. The City's first draft and HCD's initial review letter are available on the project website, www.AtHomeinEncinitas.info. Please find attached the second draft City of Encinitas 2013-2021 Housing Element for HCD's review.

Nearly all of the changes made in response to HCD's initial review are technical in nature, including providing more information or clarifications. One substantive change was to remove the City's initial request for consideration of a reduction in the default density of 30 dwelling units per acre down to 25 to accommodate lower income households. The City is unable to provide the justification asked by HCD and therefore this special request has been withdrawn. The City also recognizes there is no meaningful benefit in having a reduced density, since three-story buildings are still needed to achieve a density of 25 units per acre and more sites would be required to accommodate the lower income Regional Housing Needs Assessment allocation for Encinitas.

To assist your staff in reviewing the draft Housing Element, this transmittal consists of the following:

ATTACHMENT TYPE	DESCRIPTION
Draft Housing Element overview of changes to programs and the housing "plan" section	This document highlights excerpts from the first draft Housing Element that include changes in ~~strikeout~~/underline format in response to HCD's review letter

ATTACHMENT TYPE	DESCRIPTION
Table A-1 Sites inventory—moderate and higher (preserved communities)	Addition and deletion of parcels or portions of parcels, as reflected in the above "Overview" attachment and addition of improvement-to-land value ratio to determine site suitability (~~strikeout~~/underline not used to track changes)
Program 1A Sites inventory—"Modified Mixed Use Place" low and lower income	Added more specificity to demonstrate site suitability, similar to Table A-1, along with justifying how existing uses does not impede revitalization and reuse; parcels or portions of parcels for which suitability was difficult to justified are no longer counted, but are included in the rezoning program to avoid spot zoning and encourage thoughtful planning (~~strikeout~~/underline not used to track changes)
Program 1A Sites inventory—"Ready-made Mixed Use Places" low and lower income	See above
Program 1A Sites inventory—"Build Your Own" low and lower income	See above
Revised Appendix B with attachments A and B—Housing Plan technical detail	Changes made in response to HCD's comment letter (~~strikeout~~/underline not used to track changes)
New Appendix E—San Diego Region Revitalization and Reuse: Policies and Trends	Context to Support Feasibility of Proposed Sites Inventory for Encinitas
Revised Table of Contents	Revised to reflect document changes/additions
One hard copy of all documents comprising the draft Housing Element	Paper printouts
A CD containing a PDF of the draft	Electronic files

As noted in the May 5, 2015 submittal, the City intends to rezone sites needed to accommodate its RHNA allocation for low and very low income concurrently with the Housing Element update. As such, the draft housing element includes three different housing strategies, each with its own sites inventory (some sites appear on more than one strategy). All three strategies are being analyzed as part of an Environmental Impact Report. The results of the EIR analysis will be presented at a future Council hearing to facilitate the ultimate selection of adequate sites by the voters.

Not all the sites included in this draft plan will be included in the City's final housing strategy. However, since the City is awaiting the EIR and further public input processes

to determine the sites to offer for voter consideration, we request that HCD review all of the potential sites in the three potential housing strategies. Only one set of sites is proposed for moderate and higher income categories, since rezonings are not necessary to accommodate these categories of sites.

We hope this second formal submittal addresses HCD's review of the City's draft Housing Element for compliance with State law. If it does, the City respectfully requests a finding of substantial compliance, subject to requisite voter approval and other final actions for adoption of the 2013-2021 Encinitas Housing Element. Should you have any questions, please feel free to contact me by phone at 760/633-2712 or via email at mranu@encinitasca.gov.

Sincerely,

MANJEET RANU, AICP, Deputy Director
Planning & Building Department

cc Jeff Murphy, Director
Mike Strong, Senior Planner
Veronica Tam, Veronica Tam and Associates, City's consultant