



City of Encinitas

Development Services Department

505 S. Vulcan Avenue, Encinitas, California 92024-3633

August 17, 2020

SUBMITTED VIA EMAIL

Ms. Robin Huntley
Housing Policy Manager, Housing Policy Division
Department of Housing and Community Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

RE: City of Encinitas 6th Cycle Housing Element 2021-2029 Update – Response to Verbal Comments

Dear Ms. Huntley:

The City of Encinitas thanks you for the opportunity to respond to verbal comments received on August 11 regarding the City's Draft Housing Element. The revised submittal documents are available on the Housing Element webpage and through the link provided via email to download. The resubmittal includes:

- **Section 1: Housing Element Policy Program** – contains the policy programs for the Housing Element.
- **Appendix A: Community Engagement Summary** – provides a summary of community engagement activities conducted and community comments.
- **Appendix B: Housing Profile Report** – provides the requisite analysis of housing need, constraints, and resources pursuant to housing element law and progress on the 5th Cycle Housing Element.
- **Appendix C: Adequate Sites Analysis** – provides the requisite analysis for the provision of adequate sites to accommodate the City's RHNA need.

We have provided a checklist showing where our response to the verbal comments received can be found within each document, and all changes are shown in 'track changes.' Please note that these changes have not yet been reviewed by the Planning Commission or City Council but represent our good faith effort to respond to your comments. If you have any questions or concerns regarding the 2021-2029 Housing Element, please feel free to contact Jennifer Gates, Principal Planner at (760) 633-2714. We appreciate your assistance throughout the certification process.

Sincerely,

Lillian Doherty
Development Services Director

1. Checklist of HCD Comments and Revised Sections

City of Encinitas 2021-2029 Housing Element Update

Comment Response Matrix – First HCD Submittal

August 17, 2020

Status	HCD Comment	Edit Reference (Section/Page) See with Track changes
Pending	Sites Analysis – Electronic Format	This will be completed when the sites analysis form is available.
Complete	Response to Public Comment	The City has responded to the public comment and sent the response to HCD.
Pending	Appendix A: Translation in Spanish	Pending Translations
Complete	Appendix A: Include List of stakeholders: who were outreached to during the planning process	Appendix A update with additional outreach stakeholder information and associated numbers for outreach materials
Complete	Appendix C: Table C5 and C6 - 11-15 include applications and narrative for the 4 additional sites (that have not submitted nor indicated they are ready to submit	Appendix C: Pages C 7-9
Complete	Figures B7-B12– Text should state number of units to be supplied on sites and not just the number of sites	Appendix B: Pages B-47, B-55 and B-57
Complete	Figure B10 -B12 – Update the scale of colors on the maps so easier to read and discuss relationship of sites to the Latino population and areas with the fewest non-white population	Appendix B: Pages B-55 – B-63 (Figures B10 and B11)
Complete	Table B45 - Manufactured housing must be allowed on the same terms as conventionally built housing.	New Program 2G Section 1: Page 1-29
Complete	Element should include a typical total for all fees including impact fees not just planning fees – also provide the percentage compared to development cost.	Appendix B: Page B-101-B-104
Complete	Element describes R30 sites must abide by mitigation measures. Explain why projects generating more than 50 trips during peak hours must prepare a traffic study	Appendix B: Page B-109
Complete	Element can include excerpts from AI to supplement info but should include all recommended actions specific to Encinitas	Appendix B: Page B-42-44, B-54, B-63-64
Complete	Address results of fair housing testing for disabilities, familial status and race as well as for gender identity.	Appendix B: Page B-43-44

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Complete	Provide description of the scale used in Table B-38– what is good compared to what is poor	Appendix B: Page B-49-B-50
Complete	The element analyzes aspect of risk for displacement – describes risk is mitigated through various state laws – element should also analyze the potential for economic displacement due to development trends in the City	Section 1: Page 1- 43-44 Program 5C Appendix B: Page B-53
Complete	Milestones are vague and should be revised for specificity and measurability	City clarified that this is a description provided in the City’s adopted CDBG Action Plan
Complete	Subjective language, change “community character”	Throughout Section 1 and Appendix B Appendix B: Page B-68, B-78 Section 1: Page 1-31, 1-33
Complete	Community opposition effect on AFFH	Appendix B: Page B-68-69
Complete	Prop A: should include a description of Prop A effects on AFFH	Appendix B: Page B-77
Complete	White population – city has dissimilarities to the region and state in all races and element should analyze what effect that has on equity and opportunity in the City	Section 1: Page 1- 35 New Program 3H Section 1: Page 1-38 Program 5A Appendix B: Page B-53
Complete	Element should describe city’s response to each of the issues raised in the AI	Appendix B: Page B-41-43 Appendix B: Section 6.4.4 Page B-63-B-64
No Change	** Housing element adoptions triggers updates of other elements of the plan - fire hazard, flood management, environmental justice,**	The City notes the required triggers and will address as required.
Complete	List City programs committing to AFFH beyond enforcing State laws.	Appendix B: Page B-61-64
Complete	Program 2B: Program should be revised to include actions directed specifically toward affordable multifamily housing – specifically target lower income multi family	Section 1: Page 1-20-22
Complete	Avg Unit Size Requirement	The City provided HCD with the Zoning Code text regarding average unit size requirements.
Complete	Program 2C: B-47 Program 2C should be revised to strengthen final bullet point objective – could be revised to include an analysis of waiting list	Section 1: Page 1-23-25 Appendix B: Page B-40

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Complete	Program 3B: does not provide date by which standards will be established	Section 1: Page 1-31
No Change	Program 3C: Commit to attempt to amend Prop A by a specific date and to not enforce for duration of SB 330	No change
Complete	Program 3D: community character language is not objective and should be removed or replaced with objective standard; provide streamlined process for multifamily approvals; prepare SB 35 application form at an earlier date	Section 1: Page 1-33-34
Complete	Program 3F: Revise language to reflect only objective standards; provide specific dates for completion	Section 1: Page 1- 35
Complete	Program 3G: provide timeline for revision of the Zoning Code after analyzing potential constraints	Section 1: Page 1-35
Complete	Program 5A: Revise AFFH to quantify actions, expand fair housing testing, provide multilingual communications, remove barriers for underrepresented communities, provide specific timelines, and identify specific actions	Program 5A Section 1: Page 1-38-42
Complete	HCD wants to see program to study barriers for people of color wanting to move to Encinitas and include actions to remove those barriers	New Program 3H Section 1: Page 1-35-36
Complete	Program 5B: Include public outreach for reasonable accommodation ordinance	Program 5B Section 1: Page 1-43
Complete	Include a policy or program to provide the adopted HE to water and sewer providers immediately after adoption	New Program 1G Section 1: Page 1-18-19