



# *City of Encinitas*

## *Development Services Department*

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

May 25, 2018

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

### **Re: City of Encinitas 2013-2021 Housing Element Update – Clarifications & Revisions**

Dear Ms. Huntley:

The City of Encinitas submitted the 2013-2021 Housing Element Update for review on April 13, 2017, with subsequent revisions submitted on April 26, and May 9, 2018. The revised document, enclosed for your review, removes one site (referred to as Strawberry Fields), adds 9 additional candidate sites suitable for lower income housing and makes conforming changes. Additionally, the revised document utilizes the definition of 'vacant' adopted by the Department of Housing and Community Development (HCD), modifies various programs in response to HCD and public comments, in particular relating to Proposition A, expands the discussion of sites for emergency shelters, and makes other miscellaneous modifications.

The April 26 revision was submitted to remove one site (referred to as L-7) from the inventory included in Appendix C of the draft Housing Element and the May 9 revision was submitted to clarify proposed programs, provide updated data associated with accessory dwelling units, and to include a discussion detailing the approach in compiling the sites for moderate units.

All modifications are indicated in redline/strikeout format. For your convenience, the attached table provides an annotated summary of changes in the document associated with this resubmittal and the previous resubmittals.

If you have any questions or concerns regarding these revisions, please feel free to contact me at (760) 633-2712 or Diane Langager, Principal Planner at (760) 633-2714. We appreciate your assistance throughout the certification process.

Thank you,

Brenda Wisneski  
Development Services Director

#### Attachments:

1. Summary table of document modifications
2. One hard copy and one CD with an electronic PDF copy of the City of Encinitas 2013-2021 Housing Element

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## Attachment 1

<b>Table 1</b> <b>Summary of Modifications to Draft 2013-2021 Housing Element</b>		
<b>No.</b>	<b>Modification Description</b>	<b>Page/Section Reference</b>
<b>Universal Revisions</b>		
1	All footers of affected documents were revised to read [DRAFT 05 25 18].	--
2	Minor text corrections (typos, removal of extra spaces) were made upon second review and redlined throughout the document. Revisions like these that are not related to substantive changes are not called out individually in the rest of this table.	--
<b>Section 1</b>		
3	"Table 2-3: RHNA Progress to December 31, 2017" title and footnote added.	Page 1-9/Program 1A – Table 2-3
4	"Accessory Dwelling Unit" column added and populated in Table 2-4. Suitable Site Capacity and Excess Capacity figures updated in table.	Page 1-10/Program 1A – Table 2-4
5	Accessory Unit Production updated from 50 to 79 in Table 2-5 based on recent ADU survey findings. Remaining RHNA number updated and footnotes revised.	Page 1-10/Program 1A – Table 2-5
6	<p>Table 2-6 was modified to remove the L-7 Parcel and Strawberry Fields Parcel, and add Sites AD12, 06, 11, AD7, AD9, AD11, AD14, AD31, and AD32. The table also has updates to the Vacant Subtotal and Total line items to reflect the new gross acreage, net acreage, and unit yield.</p> <p>Additionally, the table was reorganized to show vacant/non-vacant site breakdowns for Sites 05, 08, and AD2.</p>	Page 1-11/Program 1A – Table 2-6
7	Figure 2-1 was updated to reflect the removal of the L-7 Parcel and Strawberry Fields and addition of the parcels listed above in item 6.	Page 1-13/Program 1A – Figure 2-1
8	Updated unit counts and percentages relating to the changes mentioned above in item 7.	Page 1-13/Program 1A
9	Various text revisions made for clarification of Program 1B. Reference to a description of the proposed development standards located in Appendix B added.	Page 1-14 & 1-15/Program 1B

10	Description of ADU survey method and results added.	Page 1-15/Program 1C
11	Program 2B titled revised to include 'for all income levels' and text revised to clarify and expand on Program 2B	Page 1-18/Program 2B
12	"Objectives" section of the table revised to clarify and add objectives. "Timeline" section of the table revised.	Page 1-19/Program 2B
13	Text in Program 2D revised for clarity. Date revised.	Page 1-20/Program 2D
14	Text revised for clarity. "Objectives" section of table revised to clarify and add objectives. "Timeframe" section of the table revised.	Page 1-25 & 1-26/Program 3C
15	Text for Program 3E revised for clarity	Page 1-27/Program 3E
16	Program 3G text and table added	Page 1-28/Program 3G
<b>Appendix A</b>		
17	Revised meeting notes based on a member of the public requesting to clarify his comments regarding support for L-7.	Housing Element Task Force/City Council Meeting Public Comments – February 28, 2018
<b>Appendix B</b>		
18	Appendix B title header added for clarification.	Page B-i/Appendix B
19	Table of Contents updated.	Page B-i through B-x/Appendix B
20	"Table B-4: Poverty Status by Race/Ethnicity" table updated to reflect accurate data.	Page B-3/Section 1.3 – Race/Ethnicity Characteristics
21	Text revised to clarify homeless population count.	Page B-25/Section 4.6 – Homeless
22	Figure B-4 was updated to reflect a missing title.	Page B-29/Section 5.3 - Housing Type
23	Vacancy rate date and percentage were updated.	Page B-31 & B-32/Section 5.4 – Housing Availability and Tenure
24	Text added for clarification of applicable Health and Safety Code sections.	Page B-34/Section 5.8 – Affordability by Income Level
25	Affordability statistics updated in text for very low, low and moderate income households.	Page B-35/Section 5.8 – Affordability by Income Level
26	Table B-34 revised for clarity.	Page B-36/ Section 5.8 –

		Affordability by Income Level
27	Section 7.6 – “Community Opposition to Housing Development” added.	Page B-42/Section 7.6 – Community Opposition to Housing Development
28	Section 7.7 text revised for clarity.	Page B-42/Section 7.7 – Local Efforts to Remove Nongovernmental Constraints
29	A date was revised updated from 2015 to 2016.	Page B-47/Section 8.1.9 – State Density Bonus Law
30	Text change clarifying Program 3C from Section 1 and adding text regarding potential community options when in opposition.	Page B-50/Section 8.1.11 – Proposition A – Voter’s Right Initiative
31	Text added regarding suitability of proposed densities.	Page B-51 – Section 8.1.12 – Specific Plans
32	Section number changes to titles.	Pages B-56 through B-76 – Various Sections
33	Text revised to update homeless population statistics and add detailed descriptions regarding Emergency Shelters. Added the following sections: <ul style="list-style-type: none"> <li>• Access to Public Transit and Services</li> <li>• Opportunity for Creation of Emergency Shelters</li> <li>• Emergency Shelter Development Standards</li> </ul>	Pages B-62 through B-66 – Section 8.3.6 – Emergency Shelters
34	Text updates regarding estimated ADUs based on recent survey results.	Page B-82/Section 10.2 – Above Moderate and Moderate Income Sites
35	Text updates regarding the proposed capacity for moderate and above moderate income sites.	Page B-83/Section 10.2.1 – Analysis of the City’s Existing Capacity and Zoning
36	Updates to Number of Parcels, Acreage, and Potential Units columns.	Page B-84/Table B-46 – Residential Capacity for Moderate and Above Moderate Income Sites
37	Text changes clarifying encouragement of redevelopment and potential unit counts.	Pages B-84 and B-85/Section 10.2.3 – Capacity on Mixed-Use Sites

38	Text added regarding infill residential development and Program references updated	Page B-89 & B-90/Section 10.3.2 – Regulatory Incentives
39	Text changes were made in this section to the number of parcels, number of lower income units, net acreage of lower income sites, and number of vacant units to reflect the removal of the L-7 Parcel and Strawberry Fields and addition of parcels listed in Section 6 above.	Pages B-91 & B-92/Section 11 – Sites Suitable for Lower Income Housing
40	Table B-48 was modified to remove the L-7 Parcel and Strawberry Fields Parcel and additions of parcels listed in Section 6 above. Updates to the Net Acreages and Potential Units were made.  Additionally, the table was reorganized to show vacant/non-vacant site breakdowns for Sites 05, 08, and AD2.	Page B-93/Section 11 - Table B-48
41	Figure B-6 was updated to reflect the removal of the L-7 Parcel and Strawberry Fields Parcel and additions of parcels listed in Section 6 above.	Page B-95/Section 11 – Figure B-6
42	ADU projection changed from 50 to 79.	Page B-95/Section 11.1 – Accessory Dwelling Unit Production
43	Text added to describe ADU survey process and results.	Page B-96/ Section 11.1 – Accessory Dwelling Unit Production
44	Figure B-7 and Figure B-8: April Accessory Dwelling Unit Survey added.	Page B-97 and B-98/ Section 11.1 – Accessory Dwelling Unit Production
45	Text changes were made to reflect the removal of the L-7 Parcel and Strawberry Fields Parcel and additions of parcels listed in Section 6 above.	Page B-100/Section 11-3 – Credits toward the 2013-2021 RHNA
46	Table B-50 was modified to reflect changes due to the removal of the L-7 Parcel and Strawberry Fields Parcel and additions of parcels listed in Section 6 above.	Page B-101/Section 11-3 – Table B-50
47	Text changes were made to the number of units accommodated on lower income sites and revisions were made to reflect the impact of the removal and additions of sites listed in Section 6 above, depending on pending litigation.	Page B-103/Section 11-4 – RHNA Carryover from the Previous Planning Period
48	Text changes were made for clarification and to update the figure for total units accommodated on sites within the Housing Element.	Page B-103/Section 11.5 – Adequacy of Sites for RHNA

49	Table B-52 was updated to reflect changes to the Sites Proposed for Rezoning and Total Capacity line items associated with the site changes listed in Section 6 above. Table also updated to reflect revised Sites available, Accessory Unit Production and footnotes revised.	Page B-104/Section 11.5 – Table B-52
50	Section 11.6 “Proposed Development Standards” added to explain the outreach effort and process for developing the development standards associated with the R30 zone.	Page B-104 and B-105/Section 11.6 – Proposed Development Standards
51	Table of proposed development standards for R30 zone added.	Page B-105/Section 11.6 – Table B-53: Proposed Development Standards
52	Section number changes to titles.	Page B-105 through Page B-124/Various Sections
53	Table B-53 changed to Table B-54	Page B-110/Section 14.1 – Evaluation of Progress towards Meeting Coastal Zone Requirements
54	Table B-54 changed to Table B-55	Page B-124/Section 14.9 – Quantified Objectives in Past Housing Element Cycles
55	Table B-55 changed to Table B-56	Page B-125/Section 14.9.1 – New Construction
56	Table B-56 changed to Table B-57	Page B-126/Section 14.9.1 – New Construction
<b>Appendix C</b>		
57	Table C-1 was updated to reflect changes to the Accessory Unit Production, RHNA Carryover, Candidate Site Unit Yield, and Total Capacity line items associated with the removal of the L-7 Parcel and Strawberry Fields and the addition of sites listed in Section 6 above, as well as Accessory Unit production survey results, and moderate site revisions.	Page C-1/Appendix C – Table C-1
58	Sites list updated to reflect changes due to the removal of the L-7 Parcel and Strawberry Fields parcel and the addition of sites listed in Section 6 above.  Additionally, the list was reorganized to show vacant/non-vacant site breakdowns for Sites 05, 08, and AD2.	Page C-3/Very Low and Low RHNA Sites Inventory

59	<p>Table C-2 “Net Acreage and Unit Yield Per Site” title added and table modified to reflect changes due to the removal of the L-7 Parcel and Strawberry Fields parcel and the addition of sites listed in Section 6 above.</p> <p>Additionally, the table was reorganized to show vacant/non-vacant site breakdowns for Sites 05, 08, and AD2.</p>	Page C-4/Very Low and Low RHNA Sites Inventory – Table C-2
60	Table C-3 revised to reflect changes due to the removal of the L-7 Parcel and Strawberry Fields parcel and the addition of sites listed in Section 6 above.	Page C-5/ Very Low and Low RHNA Sites Inventory – Table C-3
61	Table C-4 added to show the breakdown of sites on residentially zoned parcels.	Page C-5/Very Low and Low RHNA Sites Inventory – Table C-4
62	The definitions of Vacant Parcel, Non-Vacant Parcel, Mixed-use Site Capacity, Site Capacity, and Owner Interest were revised. Note 1 was added for clarification.	Page C-7/Definitions
63	The cut sheets for the L-7 Parcel were removed.	Pages C-10 & C-11/Very Low and Low RHNA Sites Inventory
64	The cut sheets for the Encinitas Blvd & Quail Gardens Sites were revised to show a split (a/b). Tables for each new grouping were added to show specific characteristics.	Pages C-12 and C-13
65	Existing Site Conditions” sheets were added to show the approximate location of environmental constraints, steep slopes, and other impediments to development.	Page C-15, C-20, C-23, C-26, C-31/Very Low and Low RHNA Sites Inventory
66	The cut sheets for the Rancho Santa Fe (Gaffney/Goodsen Parcels were revised to show a split (a/b). Tables for each new grouping were added to show specific characteristics.	Pages C-16 and C-17
67	Site Description on cut sheet for Sage Canyon Parcel updated.	Page C-20
68	The cut sheets for the Baldwin & Sons Properties were revised to show a split (a/b/c). Tables for each new grouping were added to show specific characteristics.	Pages C-23 and C-24
69	Rancho Santa Fe East site cut sheets added.	Pages C-27 and C-28
70	Clarification of no residency requirements for Greek Church parcel added.	Page C-29
71	Armstrong Parcels cut sheets added.	Pages C-31 and C-32

72	Parcel Size Calculation for Echter Property text revised and table note removed.	Page C-35
73	The cut sheets for the Strawberry Fields Parcel were removed.	Pages C-37 through C-39
74	El Camino Real South Parcel cut sheets added.	Pages C-40 and C-41
75	Table note removed for Sunshine Gardens	Page C-42
76	Dewitt Property cut sheets added.	Pages C-44 and C-45
77	Seacoast Church cut sheets added.	Pages C-48 and C-49
78	Manchester Avenue West sites cut sheets added.	Pages C-50 and C-51
79	Harrison Properties cut sheets added.	Pages C-52 and C-53
80	Meyer Proposal cut sheets added.	Pages C-54 and C-55
81	Garden View Court (previously Frog's Gym) parcel cut sheets added	Pages C-56 and C-57
82	"Calculation of Unit Capacity" and "Process of Site Evaluation" sections added to show the capacity for downtown sites to redevelop.	Page C-58 and C-59/Moderate and Above Moderate Sites Candidate Inventory
83	Table C-2 "Infill Development Examples in RHNA Planning Period" added to show examples of infill developments within the RHNA planning period.	Page C-59/Table C-2 - Infill Development Examples in RHNA Planning Period
84	Map of Moderate and Above Moderate Sites revised.	Page C-60/Map of Moderate and Above Moderate Sites
85	Sites have been vetted to exclude recent development, existing higher density housing development, and other sites not likely to redevelop for housing within the planning period.	Pages C-62 through C-68/Moderate and Above Moderate Sites Candidate Inventory
86	"Table C-6" added to title	Pages C-69 through C-71/
87	Revised letters stating owner interest and willingness to develop within the planning period have been updated for many of the original sites and new letters added for the additional sites. We are still awaiting owner interest letters for some sites and will send them as additional information when we receive them.	Pages C-72 through C-114/Section C.4 Letters of Interest From Property Owners for Very Low and Low-Income Candidate Sites