



# AGENDA REPORT

## Joint Study Session of the City Council & Planning Commission

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**MEETING DATE:** March 11, 2015

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**SUBJECT:**

At Home in Encinitas. The purpose of this joint study session of the City Council and the Planning Commission is to: 1) Review the draft modifications proposed to the City's Housing Element document; and, 2) direct that the conceptual draft document be analyzed in the Environmental Impact Report (EIR).

**RECOMMENDED ACTION:**

Staff recommends the following:

1. Receive the draft changes to the draft Housing Element;
2. Receive and consider public testimony;
3. Direct any changes/modifications to the draft Housing Element;
4. Direct that the conceptual Housing Element be analyzed in the Environmental Impact Report (EIR); and,
5. Authorize staff to submit the conceptual Housing Element (with conceptual housing strategy sites) to the Department of Housing and Community Development (HCD) for Substantial Compliance Determination.

**STRATEGIC PLAN:**

The action before the Council fits within the Community Planning focus area and will help achieve the goal to qualify for a certified Housing Element.

**FISCAL CONSIDERATIONS:**

The action before the Council is to consider the draft modifications to the City's Housing Element for environmental analysis. This action will result in a fiscal impact associated with the preparation of an EIR. Funding for the EIR was authorized by Council on February 25, 2015. The consultant contract for the preparation of the EIR will be considered on March 11, 2015.

**BACKGROUND:**

The Housing Element, which is one of the seven mandated elements of a jurisdiction's General Plan, is a plan required by the state that outlines how a city will meet its housing needs of existing and future residents. The City's current Housing Element document has not been

comprehensively updated since 1992. A lot has changed since that time, and the current goals, policies, programs and existing conditions need to be modified to address more relevant issues and current state mandates.

## **ANALYSIS:**

Our approach to editing the policy document was to limit the changes to address only what was legally required in order to secure HCD certification of the City's Housing Element. That being said, nothing prevents the Council from adding additional programs and/or policy changes either as part of the official element update or independently from this effort.

The first part of this Analysis section discusses the approach to editing the existing text in the current Housing Element document. The second portion of the Analysis section discusses the implementing programs...the actual activities that the City will complete within the housing cycle to address housing related issues such as affordability, housing constraints and conservation of existing housing stock.

### **A. Approach to Document Editing**

The City's current Housing Element is broken down into three main sections: Introduction, Goals and Policies, and Housing Plan. Below summarizes the purpose of each section and outlines staff's approach to editing/amending each respective section.

#### **1. Introduction of the Housing Element**

The purpose of the introduction section is to set the format and organization of the Housing Element. The section includes components such as a purpose statement and an overview of the public participation and engagement. Much of the existing text is outdated and requires an update to reflect current data and/or circumstances.

However, we are able to keep some of the existing text as it still provides a relevant backdrop to today's housing challenges and needs. Text changes are shown in strikeout/underline format and where appropriate, staff included a text box describing why the text was being deleted, amended or relocated elsewhere in the document (Attachment A).

#### **2. Housing Element Goals and Policies**

This section contains the goals and policies the City intends to implement to address a number of important housing-related issues. This section sets the direction for how the City proposes to address its current and future housing needs. The text changes proposed to this section (strikeout/underline format) are largely intended to reflect changes in state law/circumstances. Similar to section one, staff included a text box describing why text was being deleted/amended (Attachment B).

Additionally, we will be including a list of implementation programs in this section, which are being proposed to show how the City intends to implement the established goals and policies over the planning period. This is a state requirement. See the section below ("Proposed Implementing Programs").

#### **3. Housing Plan**

This section assesses the factors that affect future housing such as population projections, employment market, household characteristics, and special needs groups, just to name a few. The plan also lists the constraints to housing such as

market constraints (i.e. economic factors, land and construction costs, financing availability), governmental constraints (i.e. land use controls, permit fees) and environmental constraints (seismic safety, flooding, storm water management, school and education, fire and emergency services). The City's current Housing Plan requires the most edits for two main reasons.

- First, the factors and challenges impacting housing today are very different from the factors and challenges experienced in the early 1990s, when most of this section was written. Upon review of the data and information used to develop this section, virtually all of the text is out of date.
- Second, HCD requires a lot more detail in the preparation of this section than in previous years. When the City adopted and certified the Housing Element in 1992, the housing plan did not require state certification. In fact, many of the factors listed in the paragraph above were not required, and therefore not found in the current plan. Today, however, the process has evolved considerably and the state requires a lot more detail and explanation before they will consider certification of a Housing Element.

For these reasons, the Housing Plan is being stricken in its entirety and rewritten (Attachment C and D).

## **B. Proposed Implementing Programs**

Under state Housing Element Law, the Housing Element must include programs that address six housing related categories, which are summarized below. A summary spreadsheet of the proposed programs that address each of these categories can be found in Attachment E; a full detailed description of the programs, with associated implementation timeline, can be found in the Attachment B under Implementation Programs.

A total of 21 programs (three are existing programs requiring no change, seven are existing programs requiring update, and 11 are new programs) are proposed in the Implementation Program. The summary spreadsheet in Attachment E will identify whether the program is required, recommended or something to be considered.

### 1. Adequate Sites Inventory [GC 65583(a)3 & 65583(c)1]

A jurisdiction must identify actions/programs that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services/facilities to accommodate the city's share of regional housing need for each income level.

### 2. Affordable Housing [GC 65583(a)7 & 65583(c)2]

A jurisdiction must show how it intends to assist in the development of adequate housing to meet the needs of extremely low, very low, low-, and moderate-income households.

### 3. Mitigation of Constraints [GC 65583(a)5 & 65583(c)3]

A jurisdiction must address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.

4. Conservation [GC 65583(c)4]

A jurisdiction must conserve and improve the condition of the existing affordable housing stock.

5. Equal Housing Opportunities [GC 65583(c)5]

A jurisdiction must promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, family status, or disability.

6. At-Risk Housing [GC 65583(a)9]

A jurisdiction must preserve for lower income households the assisted housing developments that are at risk of becoming homeless.

**ENVIRONMENTAL CONSIDERATIONS:**

The action before the City Council is statutorily exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15262, Feasibility and Planning Studies. This item involves the ongoing study related to reporting the result of public input and seeking general direction from the Council, with input from the Planning Commission, on preparing an update to the City's Housing Element. This general direction does not have a legally binding effect on any possible future discretionary action. The approach to conducting the process for updating the Housing Plan considers environmental factors, such as climate change and coordinated planning of land use, transportation and housing, pursuant to Senate Bill 375 (Steinberg, 2008). Public input received and technical information prepared during the proposed process will be utilized in preparing an Environmental Impact Report for the Housing Plan Update.

**ATTACHMENTS:**

- Attachment A: Section 1 – Introduction of the Housing Element (Strikeout/Underline Changes)
- Attachment B: Section 2 – Housing Element Goals and Policies (Strikeout/Underline Changes)
- Attachment C: Section 3 – Housing Plan (Current Version; No Changes)
- Attachment D: Section 3 – Housing Plan (Proposed Replacement)
- Attachment E: Summary Spreadsheet of the Proposed Implementation Programs
- Attachment F: Summary of the Existing Implementation Programs

## **Attachment A:**

### **Section 1 – Introduction of the Housing Element (Strikeout/Underline Changes)**

INTRODUCTION OF THE HOUSING ELEMENT

Purpose of this Element

The Land Use Element is concerned with housing in a spatial context while the Housing Element identifies housing programs aimed at new housing construction, and rehabilitation and conservation of the existing affordable housing stock. This Housing Element builds upon the land use goals and policies which are primarily concerned with where new housing is to be located and at what density it will be constructed. Other concerns of the Housing Element include the identification of strategies and programs that focus on housing affordability, rehabilitation of substandard housing, meeting the existing demand for new housing, and maintaining an adequate supply of rental housing. The Housing Technical Report provides background information and serves as a technical appendix for the Element.

This section is outdated and pertains to activities and actions occurring in the 1990s. The preceding paragraph adequately captures the purpose of the Housing Element, so replacement language is not proposed.

~~The Encinitas Housing Element was first adopted on March 29, 1989, as part of the City's first comprehensive General Plan. A draft of that element had been reviewed by the State Department of Housing and Community Development (State HCD) as provided by State law, and the Element as adopted was responsive to HCD's comments. Notwithstanding, shortly thereafter State HCD provided a lengthy and detailed analysis of the Element as adopted which suggested several changes, especially involving further detailing of information. In the summer of 1989 the San Diego Association of Governments also began the process of revising a regional housing needs statement for the San Diego region (referred to in this Element as the 1990 RHNS) which provides updated regional housing share estimates for each City in the County. These share estimates are required by State law to be included in each City's Housing Element.~~

**Paragraph Amended 6/17/92**

~~To address State HCD's comments and suggestions, and be able to incorporate regional share numbers into the Element, the City Council determined in late 1989 to initiate a review of the Element. The result was a revised Element, adopted on April 24, 1990, after public workshops on housing issues, new State HCD review, public review, and public hearings by the City's Planning Commission and the Council.~~

Outdated language is being replaced with current circumstances. The added text is consistent with the information presented in the outreach materials during Community Dialogue Sessions and other presentations with stakeholder groups (refer to Agenda Report dated January 21, 2015 for detail).

~~In recent years, State and federal legislation have recognized the potential loss of existing government-subsidized rental housing units through owner prepayment or expiration of the subsidy arrangement. State housing law requires that local housing elements establish the status of such "units at risk," and address available means to either replace them or provide a study of such~~

~~units in Encinitas in 1991. Based on this study Council initiated an amendment of the Housing Element in January 1992. After State HCD review and public hearings, an amendment was adopted on June 17, 1992.~~

~~In recent years, attention has focussed on the high cost of housing. Younger families just entering the housing market are finding it more difficult to qualify for housing loans. Many of these families are paying in excess of 30 percent of their monthly income for housing. The high cost of housing also places a greater strain on those households with limited resources, especially single parent households or senior citizens on fixed incomes.~~

The City is facing some significant challenges when it comes to meeting our housing needs --- housing costs in Encinitas continue to climb, while the availability and variety of our housing is lacking. The median housing cost in Encinitas is nearly 20 percent higher than other North county coastal areas. At the same time, we have a growing population and our existing residents have changing needs. For example,

- Baby Boomers are aging and our senior citizen population is projected to nearly double by 2035. Many seniors will seek to downsize and move into smaller homes in urban areas with easy access to services, transportation and amenities.
- Millennials have been slower to buy single-family homes than earlier generations. Rising student debt, the cost of housing, and challenges in securing mortgages have contributed to this, but they often want different things in housing and neighborhoods than are available today. They are looking for pedestrian and bike-friendly communities with services and amenities nearby.
- According to SANDAG's regional growth forecast, ca can expect steady population growth through 2050.

It is important to also note that ~~N~~new residential development in Encinitas has placed an additional burden on public services and infrastructure. New schools, roads, fire stations, sewers, and a host of other facilities and services will require expansion if current levels of service are to be maintained. Finally, there are concerns that future residential development will further degrade the local environment, including the hillside areas, natural stream channels, and wetlands. All of these areas are viewed by residents as resources worth preserving.

Clarifying language.

The Housing Element recognizes the need to provide housing for all economic segments of the community, which must consider and mitigate adverse impacts to services and infrastructure. The Housing Element also satisfies the legal requirements that housing policy be a part of the General Plan. This Encinitas Housing Element is prepared for the 2013-2020 update cycle for jurisdictions in the San Diego Association of Governments (SANDAG) region.

~~Related Plans and Programs~~

~~The San Diego Association of Governments initiated the preparation of a series of regional growth forecasts in the early 1970's, which since has become a fundamental element of regional and local planning. The Series 7 Forecast is the most recent of those growth forecasts, a result of a cooperative effort between the staff of SANDAG and each city in the region as well as the County of San Diego. The Series 7 Forecast illustrates the likely distribution of 2.59 million people throughout the region in 1995; 2.78 million in 2000; and 3.15 million by the year 2010. The Series 7 Forecast also indicates the likely population distribution in distinct subareas of the SANDAG region. The subarea forecast reflects a consensus of the current public policies in the General and Community Plans of the region's jurisdictions. Future urban growth and employment development, as well as the inter-jurisdictional impacts of public policy changes, can be observed in the future distribution of people, employment and land use activity.~~

Source information for determining growth are discussed in more detail in Section 3, and includes the following data: Series 12, 2010 Census, population and demographic data from the State Department of Finance, housing market information from Dataquick and Realtytrack, and labor statistics from the CA Employment Development Department. As such, the section is being deleted.

~~The Series 7 subarea forecasts cannot be used to distribute "regional housing needs" among individual cities, as required by state law. The regional need figures quoted in this Element are based instead on the 1990 Regional Housing Needs Statement, also produced by SANDAG. But the RHNS and Series 7 have a common statistical base in computing the projected growth of the entire region. The City needs to be confident, then, in the accuracy of both series 7 and the RHNS insofar as they establish planning goals and objectives for the City's Housing Element. The City's intent with this Element is to satisfy the need for housing, with a variety of programs tailored for the broad variety of that need. In carrying out those programs, the City will be one of several local governments addressing the regional housing problem.~~

Scope and Content of the Housing Element

The Housing Element consists of housing goals and policies for the five communities that comprise the City. Specific housing programs that will implement these goals and policies are identified in the section entitled Housing Plan which follows the Goals and Policies. Finally, the

Housing Element Technical Report contains much of the necessary background data required for formulating these goals and policies as well as supporting technical data required by the State Housing and Community Development Department.

The State Legislature recognizes the important role of local general plans, and housing elements in particular, in implementing Statewide housing goals which call for the provision of decent and sound housing for all persons. In addition, the importance of continuing efforts toward providing housing that is affordable to all income groups is stressed. ~~The major concerns of the Legislature with regard to the preparation of housing elements are included in the State Code which states:~~

- ~~° Local governments should recognize their responsibility in contributing to the attainment of the State's housing goals;~~
- ~~° Cities and counties should prepare and implement housing elements coordinated with State and Federal efforts in achieving the State's housing goal;~~
- ~~° Each local jurisdiction should participate in determining the necessary efforts required to attain the State's housing goals; and finally~~
- ~~° Each local government should cooperate with other local governments in addressing regional housing needs.~~

~~The State Department of Housing and Community Development is also very specific regarding the scope and content of housing elements prepared by cities and counties. State requirements are summarized in Table 1, and have been addressed in the applicable sections of the Encinitas Housing Element.~~

**Paragraph  
Added  
6/17/92**

Replaced with updated text

~~For the 1992 amendment of the Element to address "units at risk," new public hearings before Planning Commission and Council were held. These followed Planning Commission and City Council public review in 1991 of a report which defined "units at risk" within the City.~~

This Housing Element covers the planning period of January 1, 2013 through June 30, 2020, and identifies strategies and programs that focus on:

- Conserving and improving existing affordable housing;

- Providing adequate sites and range of housing types;
- Assisting in the development of affordable housing;
- Removing governmental and other constraints to housing development; and,
- Promoting equal housing opportunities.

An important goal of this element is to ensure that the City of Encinitas embraces the distinct identity and character of its five communities and becomes a place where one can live their entire life with housing for all ages, incomes and abilities. The City envisions itself as a sustainable community that embraces everyone's quality of life through environment, fiscal health, community health and equity. This Housing Element provides policies and programs to address these issues. The 2013-2020 Encinitas Housing Element consists of the following major components:

- **Introduction:** An overview of the purpose and contents of the Housing Element.
- **Goals and Policies:** A set of goals and policies to guide the City actions and decisions relating to the provision of housing.
- **Implementation Plan:** A strategy to address the identified housing needs given the City's constraints and resources.
- **Housing Needs Assessment:** An analysis of the demographic and housing characteristics and trends.
- **Housing Constraints:** A review of potential market, governmental, and environmental constraints to meeting the identified housing needs.
- **Housing Resources:** An evaluation of resources available to address housing goals.
- **Review of Past Accomplishments:** An evaluation of previous Housing Element-related accomplishments.

Citizen  
Participation

Replaced with updated text

~~There was a considerable amount of public participation, both direct and indirect, in the formulation of Encinitas' housing goals, policies, and programs. The Introduction to~~

~~the General Plan details the public participation and review of the entire General Plan at different stages related to the plan's initial adoption, 1987-1989. This participation was in many forms, including a questionnaire distributed at the various public meetings held in the early stages of the work program, workshops and study sessions held throughout the program at monthly intervals, and weekly meetings with the General Plan Ad Hoc committee. Finally, the public had an opportunity to review and comment on the General Plan at hearings held before the various Community Advisory Boards, the Planning Commission, and the City Council.~~

~~TABLE 1  
STATE REQUIREMENTS FOR HOUSING ELEMENTS~~

<del>Required Housing Element Component</del>
<del>A. <u>Housing Needs Assessment</u></del>
<del>1. Analysis of population trends in Encinitas</del>
<del>2. Analysis of employment trends in Encinitas</del>
<del>3. Projection and quantification in Encinitas' existing and projected housing needs for all income groups including the locality's share of regional housing need</del>
<del>4. Analysis and documentation of Encinitas' housing characteristics including the following:</del>
<del>    a. level of housing cost compared to ability to pay;</del>
<del>    b. overcrowding;</del>
<del>    c. housing stock condition.</del>
<del>5. An inventory of land suitable for residential development including vacant sites and sites having redevelopment potential and an analysis of the relationship of zoning, public facilities and services to these sites</del>
<del>6. Analysis of existing and potential governmental constraints upon the maintenance, improvement, or development of housing for all income levels</del>
<del>7. Analysis of existing and potential non governmental (market) constraints upon maintenance, improvement or development of housing for all income levels</del>
<del>8. Analysis of special housing needs: (handicapped, elderly, large families, agricultural workers, female heads of households, and the homeless)</del>
<del>9. Analysis of opportunities for energy conservation with respect to residential development</del>
<del>10. Analysis of the number and current status of housing projects built in the past under specified forms of government subsidy, in return for units guaranteed affordable to very low, low, and moderate income households. Analysis must identify whether such projects are "at risk" of having the government subsidies expire or be prepaid, with a resulting loss of affordable housing.</del>
<del>B. <u>Goals, Objectives, and Policies</u></del>
<del>1. Identification of the City of Encinitas' community goal relative to maintenance, improvement, and development of housing</del>

~~Table Amended 6/17/92~~

~~TABLE 1~~  
~~STATE REQUIREMENTS FOR HOUSING ELEMENTS~~  
~~(Continued)~~

<del>Required Housing Element Component</del>
<del>2. Quantified objectives and policies relative to the maintenance, improvement, and development of housing in Encinitas</del>
<del>C. <u>Implementation Program</u></del>
<del>An implementation program should do the following:</del>
<del>1. Identify adequate sites which will be made available through appropriate action with required public services and facilities to facilitate a variety of housing types for all income levels.</del>
<del>2. Program to assist in the development of adequate housing to meet the needs of low and moderate income housings</del>
<del>3. Identify and, when appropriate and possible, remove governmental constraints to the maintenance, improvement, and development of housing in Encinitas</del>
<del>4. Conserve and improve the condition of the existing affordable housing stock in Encinitas</del>
<del>5. Promote anti-discriminatory housing practices</del>
<del>6. Identify programs which may address any "units at risk."</del>

~~Table Amended 6/17/92~~

This updated text was included in the Agenda Report dated January 21, 2015.

~~The update of the Housing Element in 1990 provided further significant public input. This included two housing workshop sessions, in October and November of 1989, which reviewed housing issues and program alternatives in detail. Following were Planning Commission and City Council public hearings on revisions of the Element as proposed in 1990.~~

When updating a Housing Element, public outreach is often limited to some workshops or study sessions; and, noticing for those meetings is often limited to mailing key stakeholder groups, placing announcements on the website and/or newspaper postings --- In essence, a traditional and common-practice form of notification.

Contrary to this standard approach, the City of Encinitas took an especially robust process to its public outreach by using several different methods in an effort to reach as many people as possible.

Attachment A includes a summary report of all the meetings staff attended, the presentations that were delivered, the ads that ran, the articles and op-eds that were published, and the other promotions received from several other agencies and local community groups, including mention in their respective newsletters and social media networks.

Some of the more notable outreach efforts discussed in the report are listed below.

- More than 21,000 mailers
- Portable electronic messaging signs in all five Encinitas communities
- 14 news articles/op-ed pieces
- More than 13,000 door hangers
- 5,400 families from Encinitas Union School District (flyer distributed)
- On-line ad on Seaside Courier's website (18,000 people)
- 750 families in Cardiff School District (flyer distributed)
- 45 briefings/presentations with business, seniors & millennial

groups

- e-Newsletter and a series of e-blasts (about 8,000 subscribers)
- 2-rounds of print ads in Coast News & Encinitas Advocate (25,000 people)
- Frequent use of social media: twitter, Facebook and Instagram
- 3 "pop-up outreach" events hosted at popular shopping centers
- Attended Encinitas Fall Festival and Moonlight Beach Festival

City staff also conducted five Community Dialogue Sessions, one in each community, from the hours of 10 a.m. to 8 p.m. During these all-day events, the public was invited to view information and directly speak with staff about housing. For citizens who could not make one of the Community Dialogue Sessions, make-up sessions were offered to the public at City Hall between the hours of 10 a.m. to 8 p.m. during the entire week of December 1<sup>st</sup>.

The Community Dialogue Sessions featured six workstations for members of the public to learn about key issues related to the process of updating the City's housing plan (also referred to as the Housing Element Update). Each station included a series of easy-to-read material boards covering varying topics. The material boards were also made available on the City's website, on a webpage that was created specifically for this project. A user-friendly URL was also created, [www.athomeinencinitasca.info](http://www.athomeinencinitasca.info), and the materials are still available for reference there.

Upon entering the session, participants were asked to sign in (optional) and provided a "Station Roadmap" that explained the purpose of the Community Dialogue Session, outlined what they should expect at each station, and highlighted important facts about the process.

With this information in hand, community members could peruse the stations at their own leisure. City staff was also available to answer any questions, and in many cases, facilitated groups

through each station and explained the information on the material boards. A summary of the public participation at the respective Community Dialogue Sessions is provided below.

<u>DATE</u>	<u>SESSION</u>	<u>ATTENDEES</u>
<u>November 13, 2014</u>	<u>Cardiff</u>	<u>61</u>
<u>November 15, 2014</u>	<u>Old Encinitas</u>	<u>115</u>
<u>November 17, 2014</u>	<u>Leucadia</u>	<u>85</u>
<u>November 18, 2014</u>	<u>Olivenhain</u>	<u>25</u>
<u>November 22, 2014</u>	<u>New Encinitas</u>	<u>158</u>
<u>December 1-5, 2014</u>	<u>Make-up Sessions</u>	<u>35</u>
<b><u>TOTAL</u></b>		<b><u>479</u></b>

The final step in the process was to provide feedback on e-Town Hall. Participants were encouraged to do this after completing all the workstations in the Community Dialogue Sessions; or, after independently reviewing the materials on the City's website.

Once participants logged on to e-Town Hall, they were asked to share their views and preferences about where housing should be located in their community and the housing types that should be built. The forum provided a series of interactive maps that helped citizens learn about where this new housing could potentially be built - and gave folks a chance to look at different types of housing that could go there, and then select the option they like best for that specific community.

The results of the e-Town Hall input were then presented and discussed at a public joint-meeting with the City Council and Planning Commission on February 3 and February 5, 2015.

Housing  
Elements  
~~Update~~  
Planning  
Period

~~Paragraph  
Amended  
6/17/92~~

~~State housing law requires that cities' housing elements be updated at least once every five years. Further, the elements for all cities in San Diego County were required to be reviewed and updated as appropriate in 1991, an analysis of housing activity within the Coastal Zone, as detailed under Gov. Code Secs. 65588 and 65590. The City conducts its 1991 review of the Housing~~

Replaced with updated text 

~~Element with results reported to State HCD. That review determined a need to amend the Element to explicitly address "units at risk." The 1991 review also monitored City success in implementing Housing Element programs, and the efficacy to date of Element policies. The City will continue to conduct annual reviews of the 1990 Element, with results reported to the City's Planning Commission, City Council, and a newly formed (1992) City Housing Commission.~~

This Housing Element was initially prepared for the 2005-2010 planning period (extended through 2012 by legislation from June 30, 2010). During this planning period, the City initiated a comprehensive update to the City's General Plan, including an evaluation of the City's land use and housing policies and affecting residential capacity in the community.

Due to the timing and public concerns related to the initial draft General Plan Update, as well as the status of the 2005-2010 Housing Element, this Housing Element has been revised to address the 2013-2020 planning period. While this Housing Element covers an eight-year planning period, Government Code Section 65588(e) requires the City to conduct an update by April 30, 2017 (four years) and again at the end of the eight-year planning period.