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Encinitas Housing Element Task Force
City of Encinitas
Encinitas, CA 92024

Dear Task Force Members:

Contrary to the belief of some, **there are workable alternatives to the electorate rejected high density, mixed use, market rate housing plan** being rehashed by the Housing Element Task Force.

Please consider the following suggestions:

- I. Rezone Surplus County and City land for 100% low income housing – Total 775 possible real low income dwelling units.*

County Land

- A. 14 acres of County property east of the Sheriff's Station - 280 dwelling units
 1. City to work with County to rezone and acquire this land at no cost.
 2. City to provide the money for site cleanup.
 3. City to work with County for replacement auto dealership parking at abandoned landfill site ½ mile away.
 4. This site meets all of HCD's low income housing physical requirements and would make a great location for low and very low income family units.
 5. Site has an entrance separate from nearby residential developments.
- B. Acquire 5 acres of open County land on Manchester Ave. north of the San Elijo Lagoon for MiraCosta student and other housing needs – Total 100 dwelling units.
 1. County received a grant and purchased City park land for a buffer for the San Elijo Lagoon.
 2. City to work with County to rezone and acquire a 5 acre portion of the land that is the farthest from the lagoon.
- C. Convert 5 acres of County land that is within the City's sphere of influence which was once a man-made lake into a low income housing site – Total 100 dwelling units.
 1. City to work with County to acquire and rezone a portion of the remains of the ruptured and abandoned lake bed within Lake Val Serrno that is not within the flood plain.
 2. This site is off the public transportation grid and away from schools and shopping, but has possibilities for quiet senior housing.

City Water District Land

- A. 9 acre Quail Garden Drive City park site – Total 180 dwelling units
 - 1. Ideal location for low income senior housing.
 - 2. City to replace park function by joining with school district in the development of part of the nearby 10 acre school site into a joint use community park, similar to the one at Cardiff Elementary.
 - B. Acquire $\frac{3}{4}$ acre of open San Dieguito Water District land at intersection of the I-5 freeway and Santa Fe Drive – Total 15 dwelling units.
 - 1. Great site for family units close to schools, public transportation, hospital and shopping.
 - 2. Presently used for outdoor storage.
 - C. Make available 5 acres of the 14 acres of the City undeveloped Cottonwood Creek park land north of Lazy Acres and west of the I -5 freeway – 100 family units
 - 1. Meets all of HCD’s low income housing requirements.
 - 2. No plans for park development on the site have been found
 - 3. Development outside the creek setback appears possible
- II. Create an Accessory Unit “Enterprise Housing Overlay zone” for the whole city that covers all zones except multi-family zones with more than 4 units per acre – Total 3,000 to 5,000 additional accessory dwelling units.
- A. The State Legislature has already granted owner occupied single family properties the right to have a single accessory unit. This overlay would extend to all property owners, regardless of zone and owner occupancy, (except major apartment complexes and senior living facilities) this same right.
 - 1. Would allow a single accessory unit on/in parcels zoned for duplexes, tri-plexus and 4-plexus and agricultural, commercial property and condo properties by right.
 - 2. Accessory units would have to meet all other city building codes and regulations in regards to parking, building height setbacks and lot coverage.
 - 3. The legalization of the City’s non-recorded units could be included.
 - 4. Most of Encinitas’ current accessory unit stock can be found carved out of existing buildings that were initially built with permits and inspected – not free standing buildings.
 - B. HCD should approve this concept because it adds to the potential of additional low income housing units.
 - C. City will have to resolve the onerous limitations on the number of accessory units approved in each RHNA cycle with HCD.

- III. Rework zoning matrix for large single family residential lots over ½ acre in size – Total 50 dwelling units.
 - A. Allow a second low income restricted accessory dwelling unit on large single family zoned lots, if all other city development requirements are met.

- IV. Conduct a citywide housing inventory, identify non-recorded dwelling units, legalize them and find ways to count as many as possible toward our RHNA obligation – Total 750 dwelling units.
 - A. The former head of HCD stated “you legalize them and we will count them”.

- V. Capture unreported City RHNA credits – Total dwelling units. **
 - A. City needs to ensure that all RHNA credits are received.
 - B. City has never conducted a housing inventory and has no idea how many dwelling units exist, where they are located or in what condition they are in.
 - 1. City needs this inventory in order to defend itself against unreasonable RHNA allocations.
 - C. City may have failed to report to HCD in a timely fashion the zone modifications for the following senior living developments.
 - 1. This failure may have RHNA implications that should be explored to see if credit can be achieved.
 - 2. It appears that all of the following facilities exceeded the 30 units per acre threshold to be considered “low income” even though their monthly rents exceeded the HCL limit.

<u>Facility</u>	<u>Address</u>	<u>Number of units</u>
Altria Encinitas	504 El Camino Real	130
Belmont Village	3535 Manchester	146
Cantebria Senior Homes	645 Via Cantebria	44
Encinitas Terrace	454 Requeza	102
Olivenhain Guest Home	Cole Ranch Road	22
Seacrest Village	211 Saxony Rd.	239
Silverado Senior Living	335 Saxony Rd.	122
Somerford Place	1350 S. El Camino Real	59

- D. The RHNA status for the Green Valley and Park Encinitas and other City mobile home parks needs to be established

- VI. Return RHNA credits from County – Total 30 dwelling units
 - A. County approved the Greek Church low income development prior to the incorporation of Encinitas and continues to receive the 30 RHNA credits even though the development is fully within the City.
 - B. Capture all other City RHNA credits that the County is reporting.

- VII. Create an overlay zone limited to the development of very low income 2 and 3 bedroom, 2 story and 20 units per acre dwelling units on a 16 acre agricultural parcel on Quail Drive, near Leucadia Blvd – 320 total dwelling units.
- A. The owner of this parcel is an Encinitas Housing Element proponent and should be given the opportunity to participate in the low income housing program.
 - B. This overlay zoning would give the owner the choice of providing needed low income housing or continue renting the land for low impact agricultural purposes.
 - C. This parcels meet HCD's transportation, shopping and education proximity requirements.
 - D. This parcels is surrounded on 3 sides with residential development and the 4th with a golf course.

*Please Note: All total dwelling unit figures listed are estimates.

** Awaiting a response from the City to a California Public Records Act Request to determine if the City is receiving RHNA credit for the listed senior dwelling units.

As can be seen from the above samples, there are other alternatives to the City's low income housing problem other than the one included in Proposition T. Please keep in mind, the main reasons the people rejected Proposition T, were in part:

1. Citizens knew the need for low income housing units and "T" provided next to none.
2. Threat to businesses and shoppers because it relied almost exclusively on commercial areas. Mixed use may work in Fresno or Merced but not in coastal destination areas because of parking. People come from miles around in automobiles to visit friends in beach areas. While singles and couples may rent an apartment over a store in mixed use areas and have up to 2 vehicles, at times, it is inevitable that they will have multiple guests over for extended periods of time with many more cars. This creates a fiscal nightmare for businesses, because the guests take client/customer parking space and without adequate parking, business suffers. Density bonus laws only make the matter worse.

Sales tax revenue is the lifeblood of Encinitas. Internet sales is already a major threat to the economy of the City. The last thing we need to do is take away customer parking.

Thank you,

Bob

Cc: Mayor and Councilpersons