

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



April 8, 2024

Richard Grunow, Director
Community Development Department
City of Coronado
1825 Strand Way
Coronado, CA 92118

Dear Richard Grunow:

RE: City of Coronado's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the City of Coronado's (City) revised draft housing element which was received for review on March 29, 2024, including technical edits received April 8, 2024. In addition, pursuant to Government Code section 65585, subdivision (c), HCD considered comments from Amy Melden. Pursuant to Government Code section 65585, HCD is reporting the results of its review.

The revised draft element, along with the technical edits, meets the statutory requirements that were described in HCD's March 5, 2024 review. However, the housing element cannot be found in substantial compliance until the City has completed necessary rezones as described below. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq) when the necessary rezoning is complete and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

Specifically, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), a jurisdiction that did not adopt a compliant housing element within one year from the statutory deadline cannot be found in compliance until rezones to make prior identified sites available or accommodate a shortfall of sites to accommodate the regional housing needs allocation (RHNA) are completed pursuant to Government Code sections 65583, subdivision (c)(1)(A), and 65583.2, subdivisions (c), (h) and (i). As this year has passed and necessary rezones are not complete (e.g., Program H-1.F (General Plan Update Program) and Program H-1.G (Development Standards)), the housing element will remain out of compliance until the City completes all the necessary rezones.

For your information, since the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, it must demonstrate that existing uses are not an impediment to additional residential

development in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). Absent findings (e.g., adoption resolution), based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Public participation in the development, adoption, and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, the City must post any revisions to the element on the City's website and email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

HCD appreciates the hard work and dedication the City's housing element team provided throughout the housing element update and review. Please note that under the stipulated judgment between the City and HCD, the City is required to adopt a substantially compliant housing element and introduce zoning amendments no later than April 16, 2024; to adopt the zoning amendments no later than May 7, 2024; and to submit the adopted zoning ordinance to HCD no later than May 8, 2024. HCD is committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Sohab Mehmood, of our staff, at sohab.mehmood@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager