DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT DIVISION OF HOUSING POLICY DEVELOPMENT

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August 29, 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) Rezone Review

Thank you for submitting the City of Coronado's (City) Ordinance 2024-08 related to rezoning to accommodate the regional housing need allocation (RHNA), which was adopted August 20, 2024 and received for review on August 21, 2024. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review.

On June 11, 2024, HCD found that the City's adopted element was substantially the same as the revised draft element that HCD's April 8, 2024 review determined met statutory requirements. Additionally, the City submitted various ordinances intended to demonstrate that the necessary rezones to accommodate the RHNA were completed and met all statutory requirements pursuant to Government Code section 65583.2, subdivision (h). However, HCD found that the ordinances did not meet the minimum density requirements of 20 units per acre. As part of that review, the City submitted draft revisions to the ordinances. HCD found that the draft revisions would comply with the statutory requirements related to minimum densities once the draft revisions were adopted, submitted to and approved by HCD, in accordance with Government Code section 65585.

HCD is pleased to find the City has completed actions to address the requirements that were described in HCD's June 11, 2024 review. Specifically, HCD finds that Ordinance 2024-08 meets all statutory requirements pursuant to Government Code section 65583.2, subdivision (h) including minimum densities. As a result, the adopted element substantially complies with Housing Element Law (Gov. Code, § 65580 et seq) as of the date of this letter.

Additionally, the City must continue timely and effective implementation of all programs, including but not limited to the following:

- Program H-1.A (Accessory Dwelling Units)
- Program H-1.B (Technical Assistance to Developers)
- Program H-1.C (Mid-Cycle Review)
- Program H-1.E (Track Navy Housing Development)
- Program H-1.F (General Plan Update)
- Program H-2.A (Pursue Funding)
- Program H-2.B (Local Funding for Affordable Housing)
- Program H-2.C (Facilitate Equitable Access for Underrepresented Residents)
- Program H-2.H (Assist with the Development of Affordable Housing)
- Program H-2.J (Faith Based Properties)
- Program H-2.I (Housing Choices)
- Program H-3.A (Assistance to Extremely Low-Income Households)
- Program H-3.B (Housing For Special Needs)
- Program H-3-E (Affirmatively Further Fair Housing)
- Program H-3.I (Housing Mobility)
- Program H-4.A (Carriage House Program)
- Program H-4.D (AB 1486 City-Owned Land)
- Program H-5.B (Supportive Housing and Low Barrier Navigation Centers)
- Program H-5.D (Emergency Shelters)
- Program H-5.F (Update ADU Ordinance)
- Program H-5.G (Definition of Family)
- Program H-5.J (Reasonable Accommodation)
- Program H-5.K (Design Review Ordinance)
- Program H-5.M (Parking Standards)

The City must monitor and report on the results of these and other programs through the annual progress report, required pursuant to Government Code section 65400. Please be aware, Government Code section 65585, subdivision (i) grants HCD authority to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or Housing Element Law. This includes failure to implement program actions included in the housing element. HCD may revoke housing element compliance if the local government's actions do not comply with state law.

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 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 now meets housing element requirements for these and other funding sources.

HCD appreciates the efforts and cooperation provided throughout both the housing element update and ordinance adoption processes. HCD wishes the City success in implementing its housing element and looks forward to following its progress through the general plan annual progress reports required pursuant to Government Code section 65400. If HCD can provide assistance in implementing the housing element, please contact Sohab Mehmood, of our staff, at Sohab.Mehmood@hcd.ca.gov.

Sincerely,

Paul McDougall

Senior Program Manager