

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

651 Bannan Street, Suite 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



October 29, 2025

David Chantarangsu, AICP
Development Services Director
1 Town Square
Murrieta, CA 92562

Dear David Chantarangsu:

RE: City of Murrieta – Trailhead at Murrieta – Letter of Inquiry and Technical Assistance

The California Department of Housing and Community Development (HCD) is aware the City of Murrieta (City) received a preliminary application on June 27, 2025 for a 380-unit project proposed at Trailhead at Murrieta located at Vineyard Parkway and Dawnwood Street (Project). This letter provides technical assistance to the City regarding the determination of base density under the State Density Bonus Law (SDBL) and seeks clarity on the general plan land use designation for the Project site.

Background

HCD understands that Diversified Pacific Development Group, LLC (Applicant) is seeking approval of an architectural review permit and tentative tract map for a housing development project submitted under the Builder's Remedy provision of the Housing Accountability Act.¹ The Project includes 380 single-family homes, of which ten percent (38 units) would be deed-restricted for moderate-income households, on a site that consists of five contiguous parcels. HCD understands that the property is approximately 64.43 acres, of which 50.77 acres of the Project site is proposed for residential use, and the site is zoned Estate Residential 2 (ER-2). Three out of the five parcels on the site are identified in the City's General Plan Housing Element.

On August 27, 2025, and again on September 2, 2025, HCD invited the City to discuss the Project and provide input on the request. The City declined both invitations via email.

¹ Gov. Code, § 65589.5, subd. (d).

Project General Plan and Zoning Timeline

Based on the City's records, it is HCD's understanding that the following are key dates and legislative actions by the City Council that pertain to the Project site:

- **July 19, 2011.** The City adopted a comprehensive general plan update and the Project site was designated Large Lot Residential, with a residential density range of 0.1 to 1.0 dwelling units per acre. The zoning for the site was Rural Residential (RR).
- **December 16, 2014.** The City Council approved GPA-2011-3026, ZC-2011-3027, and TTM-2011-3028 for the five-parcel site, changing the general plan land use designation from Large Lot Residential to Single-Family Residential for 50.77 acres, with a residential density range of 1.1 to 10.0 dwelling units per acre. The zoning for the site was also amended from RR to ER-2, which is consistent with the Single-Family Residential land use designation.
- **July 7, 2020.** The City Council adopted a focused update of its 2011 General Plan (GPA-2018-1751) and associated Supplemental Environmental Impact Report (SEIR), which included an update of the City's general plan land use element (GPLU). The GPLU revised the mix and location of land use designations in six key areas and the SEIR only analyzed the subject areas that changed. The Project site was not included in any of the six key areas.
- **December 22, 2023.** HCD certified the City's 6th Cycle Housing Element, which identified three of the five parcels in the Project in its sites inventory as a "pipeline project." One of the parcels is listed with a general plan land use designation of Single-Family Residential, while the two other parcels are listed as Large Lot Residential.²
- **June 27, 2025.** The Applicant submitted a complete SB 330 Preliminary Application for the Project.
- **July 25, 2025.** The City confirmed the SB 330 Preliminary Application to be compliant with Government Code section 65941.1, subdivision (a), but identified the general plan land use designation as Large Lot Residential for the Project site.

What is the Project site's general plan land use designation?

Based on the City's legislative actions in the Project timeline above, it is HCD's understanding that the Project site has a general plan land use designation of Single-Family Residential.

The City Council adopted Resolution 14-3332 in 2014, which changed the land use designation for 50.77 acres of the Project site from Large Lot Residential to Single-Family Residential and the zoning from RR to ER-2. The Project site was not included in

² City of Murrieta [6th Cycle Housing Element](#), certified December 22, 2023, Appendices A-D (Past Performance, Adequate Sites, Community Outreach and Glossary), p. B-51.

the City's 2020 focused General Plan Update, nor in any specific plan document. To revert the land use designation from Single-Family Residential to Large Lot Residential, the City would have had to conduct at least one public hearing and give notice of the intention for such a general plan amendment according to the procedures detailed in Government Code sections 65355 and 65090. In addition, the City would have had to amend the zoning to ensure consistency with the general plan.³ In other words, the City would have created a new inconsistency if the site were reverted to Large Lot Residential (density range of 0.1 to 1.0 dus/acre) but the zoning remained ER-2 (density range of 1.0 to 2.0 dus/acre.)

Furthermore, to change the land use designation to a less intensive use than what was in effect on January 1, 2018 (i.e., from 1.1 to 10.0 dus/acre residential density to 0.1 to 1.0 du/acre), the City would have had to ensure that there was no net loss in residential capacity by concurrently increasing residential density elsewhere within the jurisdiction.⁴

Since there appears to be no evidence in the 2020 focused General Plan Update that no net loss was contemplated, nor that such a reversal was considered or approved, HCD understands that the land use designation for the Project site remains Single-Family Residential and the zoning is ER-2.

Is the Project eligible for the State Density Bonus Law?

Yes, the Project is eligible for the SDBL because the application includes a development project for five or more residential units on contiguous sites that are subject to one development application⁵ and proposes at least ten percent of the total dwelling units for-sale to moderate income households.⁶ Though the Project does not propose any density bonus units, a developer need not seek a bonus in units in order to qualify for other SDBL provisions, including waivers and concessions.⁷

What is the applicable base density for the Project?

It is HCD's understanding that the applicable base density for the Project is ten dwelling units per acre, or 508 dwelling units across 50.77 acres.

The SDBL defines base density to mean: "[T]he maximum number of units allowed under the zoning ordinance, specific plan, or land use element of the general plan, or, if a range of density is permitted, it means the maximum number of units allowed by the

³ Gov. Code, § 65359.

⁴ Gov. Code, § 66300, subd. (h).

⁵ Gov. Code, § 65915, subd. (i).

⁶ Gov. Code, § 65915, subd. (b)(1)(D).

⁷ See City of Millbrae HCD Technical Assistance Letter, dated 2/28/2020. Available at: <https://www.hcd.ca.gov/community-development/housing-element/docs/smtMillbrae-TA-022820.pdf>

specific zoning range, specific plan, or land use element of the general plan applicable to the project.”⁸ For this Project, the general plan land use element provides for the greatest number of units, of up to 10 dwelling units per acre or 508 dwelling units.

Conclusion and Next Steps

There appears to be no evidence that the City took legislative action to change the general plan land use designation for the Project site after its amendment in 2014 and therefore the land use designation remains Single-Family Residential. Since the Project is eligible for the SDBL, the applicable base density is the density from the zoning ordinance, specific plan, or land use element of the general plan that allows the greatest number of units – which is the Single-Family Residential land use designation.

The City has until November 26, 2025 to provide a written response to this letter for HCD to evaluate whether the City has appropriately determined the Project’s base density under the SDBL. In the City’s response, please include the following materials:

1. December 16, 2014 City Council materials regarding GPA-2011-3026, ZC-2011-3027, and TTM-2011-3028, including staff report, resolutions, general plan land use and zoning maps, and other associated attachments.
2. July 7, 2020 City Council materials regarding GPA-2018-1751, including staff report, resolutions, general plan land use and zoning maps, and other associated attachments.

As the City is likely aware, HCD has enforcement authority over the SDBL and may review local government actions and inactions to determine consistency with these laws and may notify the California Office of the Attorney General if a local government is in violation of state law.⁹

If you have any questions or need additional information, please contact Grace Wu at grace.wu@hcd.ca.gov.

Sincerely,



Melinda Coy
Housing Accountability Unit Chief

⁸ Gov. Code, § 65915, subd. (o)(6).

⁹ Gov. Code, § 65585, subd. (j).