

**6<sup>th</sup> Cycle 2021-2029 Draft Housing Element – Public Comments and Responses**  
**(Does not include comments/responses concerning associated environmental documents (ISND) or from/to State Department of Housing and Community Development (HCD))**

Date Comment Received	Commenter	Comment Summary	<b>Draft Responses in progress and to be released prior to October 5, 2021 City Council Public Hearing</b>
04.10.2021	Grace Peng, PhD, Resident	<p>Commented her concerns that HCD will reject the draft Housing Element and that the draft HE does not meet the requirements of Affirmatively Furthering Fair Housing (AFFH) and produces disparate impacts. Offers alternatives.</p> <p>Comments and questions concerning why the City did not examine its past history. Notes that rules have changed since the fifth RHNA cycle and are publicly available.</p> <p>Notes multiple Federal, US Supreme Court, State, and Regional government sources of information related to provision of fair housing.</p> <p>Notes the importance of aerospace industry in North Redondo Beach and recommends not putting a housing overlay on the Industrial areas that support the aerospace industry.</p> <p>Comments that GPAC was guided by Environmental Justice. Notes data from CalEnviroScreen and cites that the proposed housing within an area bounded by Inglewood, Marine, Redondo Beach Ave, Manhattan Beach Ave and next to 405 freeway will be negatively impacted by pollution.</p> <p>Notes HCD would not support housing on the Northrop Grumman site and then assign the city a much higher housing target to reflect an expected low yield at this location.</p> <p>Claims that Redondo Beach still bears the marks of “20<sup>th</sup> century racist zoning and lending practices”. Cites a “mapping inequality” exhibit concerning lending practices and demographic data in support.</p>	<p>HCD’s September 2, 2021 letter has requested additional information concerning the North Tech District housing site and the contiguous small lot sites located along 190<sup>th</sup> and one small lot site on Pacific Coast Hwy. City staff continues to investigate these housing sites and has engaged property owners to confirm and, in some cases, reconfirm support for the identification of the subject properties as potential sites for future high density residential and/or mixed use. To date staff has confirmed significant interest from the property owner of the largest shopping center in the North Tech District for the future additional development of high density residential at this location. Additionally, none of the property owners of the small sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties. Staff is continuing to investigate these sites. Staff does not anticipate that HCD will not accept the proposed housing sites based upon the overwhelming interest by property owners for potential high</p>

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		<p>City should up zone all R1 zones to R2 or R3, and give incentives to combine lots for building even more densely.</p> <p>Cites a USC study that found in high rent areas a higher percentage of inclusionary (subsidized housing) can be supported.</p> <p>Notes that students living in the north tech area (Freeway) and transit center (South Galleria) housing sites will have to cross train tracks and at least one arterial roadway to get to elementary school. Claims this creates disparate pollution and traffic impacts on some residents. Comments on negative school impacts with plan.</p> <p>City should put housing above parking lot in Riviera Village and incentivize lot consolidation for mixed use in Riviera Village.</p> <p>Notes benefits of reducing segregation and includes a table with student economic and racial demographic information per school in Redondo Beach.</p> <p>Comments that AES power plant site should be developed with highest number of VLI/LI units in the City. Cites an environmental justice argument to support housing recommendation on AES site.</p> <p>Concludes with request that the City do better and more equitable zoning.</p> <p>Includes Appendixes with CalEnvironScreen data per City Census Tract, School Populations with Economic Data.</p>	<p>density residential on the determined housing sites per the draft housing element.</p> <p>Any future redevelopment of high density residential within the North Tech District will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation the environmental justice issues will be addressed and mitigation as required determined through the associated environmental analysis.</p> <p>No Northrop Grumman properties are included as future housing sites.</p>

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			<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
04.12.2021	Therese Mufic Neustaedter	<p>Comments that Redondo Beach is “gaming” the Housing Element Update. Comments that RB downzoned southern part of town and added homes to northern end of town. Commenter questions putting housing overlays on northern industrial area next to freeway and between other busy roadways. Commenter attached letter with comments on Draft Housing Element from Grace Peng, PhD dated April 10, 2021.</p>	<p>The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city’s overall highest density remains within the southern area of the City.</p>

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			See responses above to commenter Grace Peng, PhD.
05.11.2021	RUTAN & TUCKER, LLP, Attorneys representing fee owners of the 50-acre site on which AES operates	<p>Comments on Planning Commission’s vote, 5 to 2, in favor of mixed use allowing 30 dwelling units per acre for up to 50% of the Power Plant site. The property owner of the site agrees with Planning Commission’s recommendation.</p> <p>Comments on current status of the AES Power Plant permits to operate per the California State Water Resources Control Board.</p> <p>Comments on property owners plans for re-use of the Power Plant site.</p> <p>Notes that owner is wants to discuss with City Council the recommended re-use of the site for mixed use development of 30 DU/AC. Power plant site represents prototypical “underutilized” property that State Law has determined should be made available for future development.</p> <p>Comments that owner has developed a plan for closure and clearing of the site by 2027. Could have approximately half the site developed with residential by late 2025.</p> <p>Comments that North Tech area site is less suitable for redevelopment and may not qualify due to the following: Proximity to freeway and adjacent industrial uses; Opposition by Northrup Grumman; eliminating commercial and industrial areas reducing local jobs and tax base; staggered leases which may make some areas unavailable; and elimination of last mile distribution of goods movement facilities.</p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p>

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		<p>Comments that Power Plant site is superior location for large commercial or mixed-use campus that held remedy City jobs/housing imbalance. Owners contemplating:</p> <ul style="list-style-type: none"> <li>• 750 residential units</li> <li>• 300 key hotel</li> <li>• 750,000 sf of office (20% studio/production space)</li> <li>• 150,000 sf of retail, restaurant and event space</li> </ul>	<p>Northrop Grumman has not expressed any opposition to the introduction of the proposed residential overlay on the North Tech District site.</p>
05.11.2021	RUTAN & TUCKER, LLP, Attorneys representing fee owners of 1021 N. Harbor	<p>Comments that this property, 1021 N. Harbor is a suitable housing site surrounded by other high density residential developed sites.</p> <p>Property owner requests that the City Council allow for residential uses at a density of no less than 30 DU/AC.</p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
05.20.2021	Anthony Dedousis, Director, Policy and Research, Abundant Housing LA (Letter submitted on	<p>Abundant Housing LA is a pro-housing, nonprofit advocacy organization. YIMBY Law’s mission to make housing in CA more accessible and affordable through enforcement of state housing law.</p> <p>Cites major concerns about the City’s willingness and ability to meet its state-mandate RHNA target of 2,490 homes by 2029. Claim that site inventory is inconsistent with HCD instructions and affirmatively further fair housing requirements under Assembly Bill 686.</p>	<p>HCD’s September 2, 2021 letter has requested additional information concerning the North Tech District housing site and the contiguous small lot sites located along 190<sup>th</sup> and one small lot site on Pacific Coast Hwy. City staff continues to investigate these housing sites and has engaged property owners to confirm and, in some cases,</p>

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	behalf of Abundant Housing LA and YIMBY Law)	<p>City fails to identify enough sites where RHNA housing growth can be accommodated by 2029.</p> <p>City’s approach fails on three counts:</p> <ol style="list-style-type: none"> <li>1. The City proposes new housing in locations where it is highly unlikely to be built.</li> <li>2. The City does not encourage new housing in locations where it is likely to be built. Leave the City’s underutilized land as-is.</li> <li>3. The City bans new mixed-use development in locations where it has successfully been built in recent years.</li> </ol> <ol style="list-style-type: none"> <li>1. Unlikely that the City’s rezoning plan will encourage meaningful housing growth. <ul style="list-style-type: none"> <li>• Area bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards – Not a credible site as Northrop Grumman is very unlikely to vacate Space Park over next 8 years.</li> <li>• Galleria District - Since the Galleria District developer is planning housing the remainder Galleria area should also be allowed to provide additional residential development. Instead City plans to allow additional residential development on surrounding properties, but those property owners have shown no interest in residential development.</li> </ul> </li> </ol> <p>City failed to provide convincing evidence that redevelopment of above sites is likely to happen.</p> <ol style="list-style-type: none"> <li>2. The City overlooks a large number of potential housing sites, including: <ul style="list-style-type: none"> <li>• The AES site (51 Acres). New owner proposes office, hotel, and retail and no residential. If entire site is built at 55 units per acre nearly all of RB’s RHNA could be accommodated.</li> <li>• The former South Bay Medical Center (9.3 acres). Site should provide additional housing at 55 units per acre.</li> </ul> </li> </ol>	<p>reconfirm support for the identification of the subject properties as potential sites for future high density residential and/or mixed use. To date staff has confirmed significant interest from the property owner of the largest shopping center in the North Tech District for the future additional development of high density residential at this location. Additionally, none of the property owners of the small sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties. Staff is continuing to investigate these sites. Staff does not anticipate that HCD will not accept the proposed housing sites based upon the overwhelming interest by property owners for potential high density residential on the determined housing sites per the draft housing element.</p> <p>As noted, none of the property owners of the proposed housing sites have expressed opposition to the potential future development of high density residential on their properties.</p>

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		<ul style="list-style-type: none"> <li>• Beachside parking lots (24 acres). Should be developed with residential, similar to Marina Del Rey.</li> <li>• The Space Park and Aviation Park parking lots (62 acres). Northrop Grumman parking lots should be developed with residential.</li> <li>• The Riviera Village parking lots. Should be developed with 60 or 215 units.</li> <li>• The west side of the Redondo Beach Transit Center. Maximum legal density should be allowed on all parcels within a half-mile of station.</li> </ul> <p>3. The City plans to reduce the amount of development in areas where housing “pencils out”. Claims the City violates “no net loss” requirements.</p> <ul style="list-style-type: none"> <li>• The South Bay Galleria should allow for more residential. The City’s up zoning of surrounding parcels is not feasible as those landowners have shown no interest in building housing.</li> <li>• Pacific Coast Highway. The City has banned new mixed-use development along PCH and moving housing a mile to the north.</li> <li>• Artesia Boulevard. The City proposes to ban new apartment buildings along Artesia. To replace this capacity, City plans to redevelop two commercial plots along 190<sup>th</sup>, at Mary Anne and Meyer.</li> </ul> <p>The City’s approach to updating the housing element does not affirmatively further fair housing and reverse existing patterns of residential segregation. The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.</p> <p>The City should commit to major constraint removal policies in order to encourage strong housing growth at all levels of income including:</p> <ul style="list-style-type: none"> <li>• Legalize apartments on all residentially zoned parcels including R-1.</li> <li>• Significantly up zone parcels near transit, job centers, schools, and parks.</li> </ul>	<p>Additionally, some of the subject property owners have experience with the “densification” of other properties they own/control that have existing commercial development.</p> <p>Mixed-use land designations are being maintained on properties with existing mixed-use developments as well as in locations in proximity to many of these developed sites.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The Housing Programs identified in the draft housing element specifically target the assessment and, if</p>

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		<ul style="list-style-type: none"> <li>• Legalize by-right residential and mixed-use development on commercially zoned parcels.</li> <li>• Pre-approval of standard ADUs.</li> <li>• Introduce density bonus program near mass transit.</li> <li>• Establish small lot subdivision program similar to City of LA.</li> <li>• Establish a fast-ministerial review process to approve new multifamily buildings.</li> <li>• Citywide elimination of on-site minimum parking mandates.</li> <li>• More flexibility on height, floor-area ratio, and lot coverage.</li> </ul>	<p>necessary, removal of governmental constraints concerning housing. Additionally, as proposed, the housing sites with the highest potential residential capacity are all within close proximity to existing and proposed transit centers. Recent changes in State housing laws, Senate Bill (SB) 9, allow for the subdivision of R-1/small lots.</p>
06.01.2021	Jon Wizard, Policy Director, Campaign for Fair Housing Elements, YIMBY Law	Requests that the City consider Redondo Beach resident and third-party commenter Dr. Grace Peng’s comments. To date the majority of the City Council has been unresponsive to Dr. Peng’s input this far. Cites Dr. Pang’s letter dated	See responses above to commenter Grace Peng, PhD.
07.09.2021	Bill Maher, Realtor	The owners of the property located at 306-312 S. Catalina Avenue would like to have their property considered for multi-family or mixed-use development.	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.



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07.09.2021	Bob Pinzler, Resident	Percentage share of Married with children in 2019 should be 23% not 29%.	The statistics as provided are consistent with most current credible data sets.
07.11.2021	Barbara Epstein, Resident	<p>Hopes planning process is protected from special commercial interests and “ill-conceived state government requirements”.</p> <p>Most important thing in planning is “greening up” of Redondo.</p> <p>Claims past city governments have catered to special developer interests, resulting in inadequate yards/setbacks on residential lots and no space for beneficial trees and plants to capture carbon and water, beautify neighborhoods, provide oxygen, and cool the atmosphere.</p> <p>Require ample green space, parkland, and trees with every residential building permit.</p> <p>Supports a proposed development on Catalina Avenue between Diamond and Emerald Streets that preserves the café and adds a bakery. Notes that the development is also overcrowded. Suggests additional development standards including planting native plant species for this proposed development. Offered South Bay Parkland Conservancy as a resource.</p>	<p>The Draft Housing Element is required to comply with State housing laws. An ongoing review process is underway with the State’s Department of Housing and Community Development to ensure the City’s housing element is ultimately compliant with applicable State housing laws.</p> <p>The issue of “greening up” will be addressed as part of the ongoing updates to the City’s Land Use and Open Space and Conservation, and Parks and Recreation Elements of the General Plan.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the</p>

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			housing sites as identified within the draft housing element.
07.26.2021	Nancy Skiba, Resident	"Affordable housing for 90277 and 90278 should be equally planned."	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.
08.23.2021	Laura Emdee, Resident (Council Person)	"If the Housing Element has been sent to HCD, what are the purpose of the comments? Where will they go and to what purpose?"	In HCD's continued discussions with City as well as in their correspondence dated September 2, 2021, HCD has emphasized Government Code Section 65583, which requires local governments to make a diligent effort to achieve public participation from all economic segments of the community in the development of the City's housing element. Specifically, HCD commented... "The City must proactively make future revisions available to the public, including any commenters, prior to submitting any

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			<p>revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD’s future review will consider the extent to which the revised element demonstrates that the City solicited, considered, and addressed public comments in the element.”</p> <p>All comments should be addressed to the City for further consideration as the City continues to confirm the housing element complies with State laws as they pertain to this matter.</p>
08.24.2021	Natalie Bennion, Resident	“North Redondo Beach is already doing it’s share to accommodate more housing. Please zone 1,245 units in the 90277 part of town. There is availability in areas such as the 50-acre power plant site.”	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.

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08.25.2021	Leonid Pustilnikov, Property Owner	<p>Claims the City of Redondo Beach has spent the last generation fighting development. Cites the Legado Project development review process in support of claim.</p> <ul style="list-style-type: none"> <li>• Originally planned for 180 units, was approved for 115 units.</li> <li>• Still awaiting permits more than a decade later.</li> </ul> <p>Notes surprise that Redondo completed 40% (559 of 1,397) of its required 5<sup>th</sup> Cycle.</p> <p>In order to meet 6<sup>th</sup> Cycle goal commenter recommends the City be proactive and update its zoning throughout the City. Notes that City’s proposed solution puts 49% of housing at the city’s edge. Claims all housing overlay sites are adjacent to other, less affluent jurisdictions. Claims probability of any units in the proposed housing overlay areas is “extremely low” and cites the following claims in support of assertion:</p> <ul style="list-style-type: none"> <li>• North Tech site. <ul style="list-style-type: none"> <li>○ A business in Redondo Beach since 1985 has no intentions of relocating or shutting down.</li> <li>○ A grocery anchored shopping center with 100% occupancy (17 tenants) has no plans of selling or repositioning the property.</li> <li>○ A national plumbing fixture showroom located at site for years.</li> <li>○ Any residential development would pose a serious adverse health impacts on its residents.</li> </ul> </li> <li>• South Transit Center site. <ul style="list-style-type: none"> <li>○ Property recently purchased in 2019 and as currently planned does not include housing.</li> </ul> </li> <li>• South Bay Galleria site. <ul style="list-style-type: none"> <li>○ Sought entitlements for 650 units and was approved for on 300 units.</li> </ul> </li> </ul>	<p>Permits have been issued for the Legado Project.</p> <p>Concerning the comments regarding the probability of residential development potential of the recommended housing sites, during the 6<sup>th</sup> cycle, the following is provided:</p> <p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>South Transit Center site – City staff continues to investigate this site and has engaged the property owner(s) to confirm and, in this case, reconfirm support for the identification of the</p>

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		<ul style="list-style-type: none"> <li>○ Claims that due to “covid pandemic” significant changes to the project are likely and will take years to resolve.</li> </ul> <p>Claims Redondo Beach is not “serious about housing” as evidenced by residential overlays instead of rezoning sites exclusively for residential. Cites the reason for residential overlays is to avoid “vocal protest” from property owners.</p> <p>Comments that currently proposed housing sites create the illusion of housing and ignores changes to most of the city. More suitable solutions in and around affluent parts of the city were not considered.</p> <p>Cited appropriate alternative locations for exclusively residential or mixed-use development that are adjacent to parks, bike paths, beaches and harbors and developments ranging from 17.5 to 120 units per acre but not considered:</p> <ul style="list-style-type: none"> <li>● 1-acre site at 1021 N. Harbor.</li> <li>● 50-acre power plant at 1100 N. Harbor.</li> </ul> <p>Notes Planning Commission’s recommendation for 50% of power plant site be zoned at 30 dwelling units per acre. Notes City Council chose other areas for housing and ignored power plant site that commenter claims are not suitable sites that will never be developed.</p> <p>Notes as the property owner of 1021 N. Harbor and 1100 N. Harbor that he has studies and reports confirming housing could be built on the site within the 6<sup>th</sup> cycle, is eager to build housing, and is currently cleaning and remediating 1100 N. Harbor in anticipation of its closure on or before December 31, 2023. Claims that the City deemed 1021 and 1100 N. Harbor unsuitable because “the city knew it would mean real housing units”.</p>	<p>subject property as potential sites for future high density residential and/or mixed use. Staff does not anticipate that HCD will not accept the proposed housing site at the South Transit Center as they did not request additional information regarding this property. Finally concerning this site, during the many GPAC meetings specific interest from representatives of this site requested that the GPAC recommend this site for high density residential, citing the site’s close proximity to the City’s Transit Center under construction and the future planned Metro station.</p> <p>To date staff has confirmed interest from many of the property owners of the recommended housing sites for the application of a high-density Residential Overlay designation on their properties. Additionally, none of the property owners of the sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties.</p>

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		Strongly urges HCD to reject the housing element as drafted. Requests that the city obtain commitments from property owners of the designated housing sites demonstrating their commitment, support, and willingness to pursue residential development. Comments that city should be fairer to its electorate and spread development throughout the city and that housing is better suited nearer to parks and space rather than freeways and industrial centers.	Staff does not anticipate that HCD will not accept any of the proposed housing sites.  The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including the 50-acre Power Plant site. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.
08.26.2021	Melissa K. Dagodag, Attorney representing a North Redondo Beach resident (Golden Hills neighborhood)	Comments that best place to build high density housing is on the 50-acre Power Plant site. Don’t put housing on sites that are bad for community when there are large parcels next to beach, bike path, parks.	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including the 50-acre Power Plant site. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the

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			housing sites as identified within the draft housing element.
08.31.2021	Sheila Lamb, resident (GPAC Member)	<p>General: Requests that new additions to housing element be identified.</p> <p>Comments on the following Sections requesting clarifications, some additional information, edits in language, and challenging various conclusions and claims that the cited information is incorrect within the document:</p> <ul style="list-style-type: none"> <li>• Section 2.2.1 Introduction (Page 1).</li> <li>• Section 2.2.1C Public Participation (Page 2).</li> <li>• Section 2.2.2D Homeless Resources (Page 22).</li> <li>• Section 2.2.2E Table H22 Single family attached units (Page 24).</li> <li>• Section 2.2.3A Constraints on Housing Production-Government Constraints (Page 34).</li> <li>• Section 2.2.3A4 Tables H35-36 Provision for a Variety of Housing Types (Pages 41-42).</li> <li>• Section 2.2.3A4 Provision for a Variety of Housing Types-Zoning and Land Use (Pages 46-47).</li> <li>• Section 2.2.3A4 Provision for a Variety of Housing Types-Senior Housing (Page 48).</li> <li>• Section 2.2.3A4 Provision for a Variety of Housing Types-Emergency Shelters, Transitional Housing, Supportive Housing, SRO's (Page 48).</li> <li>• Section 2.2.3B5 Liquefaction (Page 61).</li> <li>• Section 2.2.3B Flooding (Page 61-64).</li> <li>• Fig. H2/H3 Sites Inventory (Pages 75-76).</li> <li>• Appendix C Public Participation (Page C-1).</li> <li>• Add Appendix-List of legislation mentioned in the text.</li> <li>• Add Appendix-List of zoning amendments in the text.</li> </ul>	At their meeting on September 16, 2021, the City's Planning Commission carefully considered these comments, in addition to many other comments, and determined that some should be addressed as revisions/edits to the proposed draft housing element. For example, figures (bar charts) were added to the draft housing element which illustrate the City's unique housing mix, with more percentage of residential land area designated as multi-family zoning rather than single-family zoning, in comparison to surrounding jurisdictions and the SCAG region overall.

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		<ul style="list-style-type: none"> <li>• Add Additional Numbers-More easily search the document.</li> </ul>	
09.02.2021	Brian Clark, Resident (Golden Hills neighborhood)	<p>Raised four (4) main concerns with the Housing Element:</p> <ol style="list-style-type: none"> <li>1. Housing Element does not mention the GLBTQIA+ community and requests that the document identify and count this community and include specialized support resources that other segments of the population have been given.</li> <li>2. Commenter does not support the placement of the majority of housing in North Redondo and most specifically the housing adjacent to the 405 freeway (North Tech District). Cites health and well-being concerns for persons having to live next to the 405 freeway.</li> <li>3. Commenter concerned with over-densifying the Northern-most corner of the City, citing that it will be too impactful a change in one area. Prefers that development be more evenly spread throughout the City on smaller parcels. Comments on inequity of plan to locate high density in one area and leave other others unchanged.</li> <li>4. Commented that during the City Council debates concerning the land plan some viewpoints were overlooked, consensus was not gained, and minority voices were disregarded.</li> </ol>	<p>The City continues to review the comment concerning the GLBTQIA+ community and whether additional considerations are necessary to include in the draft housing element.</p> <p>Any future redevelopment of high density residential within the North Tech District will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p>



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			<p>The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city’s overall highest residential density remains within the southern area of the City.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>

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09.02.2021	Dan Elder, Resident	Commented that the overwhelming feedback from residents and the Planning Commission was ignored by City Council in identifying the Residential Overlays for the required RHNA housing locations. Cites that nearly every RHNA housing sites are in North Redondo Beach which will place a significant burden on infrastructure. Supports a more balanced approach for locating housing as identified by residents at multiple meetings.	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.
09.02.2021	Barbara Epstein, Resident	Commenter supports the preservation and creation of as much open space and parkland as possible in the City. Cites too much density existing in support of this comment. Comments desire to increase tree canopy for healthier air quality, carbon capture, shade, habitat and beauty in every neighborhood.	The issue of “open space and parkland” will be addressed as part of the ongoing updates to the City’s Land Use and Open Space and Conservation, and Parks and Recreation Elements of the General Plan.
09.02.2021	Gregory McGinity, Resident	Strongly urges the City Council and Planning Commission to reject the 2021-2029 Housing Element. Cites severe lack of water. City should implement system similar to City of Cambria, which does not allow additional housing without additional water. Recommends “growth management” ordinance.  Commenter does not believe the City has enough water to accommodate the City’s housing needs through 2040. Comments that water rationing now is necessary.	The actual changes in land use designations to accommodate the recommended housing sites will be executed with the update to the City’s Land Use Element of the General Plan. At that time a comprehensive environmental analysis compliant with CEQA will be conducted. The environmental impact report will include an assessment of water

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		<p>Commenter cites NASA and IPCC concerning impacts of climate change in the future and its furtherance of water shortage for City.</p> <p>Comments on uncertainty of future supplies from State Water Project and the Colorado River Aqueduct which supply nearly 50% of water purveyors sources.</p> <p>Commenter further specified water resource details concerning State Water Project and Colorado River water supplies and cites the crises facing both of these sources.</p> <p>Provides additional comments and sources concerning climate change, Sierra Nevada snowpack issues, and other water resources shortages, and concludes that because of all data the commenter cites, it seems unlikely that current and certainly future water needs can be met, and therefor the City should reject the plan.</p>	resources and impacts of climate change and mitigation as necessary will be identified.
09.03.2021	Chris Ahearn, Resident - Homeowner	Comments that it is very difficult to see the maps of the draft plan. City emailed copies but the quality was similarly poor. Because of the poor-quality plan commenter does not feel he has enough information to comment. Document does not specifically answer how this plan will affect current homeowners and it should.	The commenter is invited to visit City Hall to meet and confer in person. Plans can be enlarged and provided as necessary.
09.03.2021	Peter Aziz, Resident	<p>Comments that the housing needs to be equally distributed throughout all of Redondo Beach, not just one or two of the densest districts. Comments that public input was ignored. Disagrees with location of housing near the freeway, citing poor air quality and poor quality of life.</p> <p>Included multiple links to articles concerning poor air quality and negative health affects for residents of housing near freeways.</p>	The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that even with the addition

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		Requests that the housing near the freeway be removed from the plan and distributed equally throughout the City.	<p>of the recommended housing sites in the northern area of the City, the city’s overall highest residential density remains within the southern area of the City.</p> <p>Any future redevelopment of high density residential within the North Tech District will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project.</p> <p>Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation the environmental justice issues will be addressed and mitigation as required determined through the associated environmental analysis will be applied.</p>

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			<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
09.03.2021	Alisa Beeli, Resident	<p>Strongly urges the City to reject the Housing Element plan and cites the following in support:</p> <ul style="list-style-type: none"> <li>• Nearly 94% of required units in the North/90278 zip code</li> <li>• Places nearly all new zones (residential high density overlays) on edges of City</li> <li>• All overlay zones are adjacent to less affluent areas of the City</li> <li>• North Tech district property owner have no plans to relocate existing commercial tenants and its location adjacent to 405 Freeway is a serious health risk</li> <li>• Alternative options for housing were not considered, 1021 and 1100 North Harbor Drive, and should be as they are next to parks, bike paths, the beach and Planning Commission recommended the 1100 North Harbor Drive location.</li> <li>• Based on only developing 40% of 5<sup>th</sup> Cycle RHNA housing, developing 2,490 is unlikely without updating zoning throughout the City.</li> </ul>	<p>The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city’s overall highest residential density remains within the southern area of the City.</p>

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		<p>Placing majority of new housing in North Redondo/90278 near freeways and industrial areas is not realistic or equitable. Cites concerns with traffic and overcrowding of schools in North Redondo.</p> <p>Concerned that hundreds of public comments were ignored and housing should be better distributed throughout the entire City.</p>	<p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>Any future redevelopment of high density residential within the any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the</p>

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			<p>future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including 1021 and 1100 North Harbor Drive sites. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
09.03.2021	Mariam P. Butler, Resident	Requests that housing/low income housing be evenly distributed throughout the City to minimize impacts to one district. D4 is already very dense and cannot accept the majority of housing. Impacts on schools and resources need to be considered.	The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State

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			<p>criteria and proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city's overall highest residential density remains within the southern area of the City.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>Any future redevelopment of high density residential within the any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental</p>



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			<p>impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p>
09.03.2021	Tieira	<p>Comments that the City must build more affordable housing in all Redondo Beach neighborhoods. All deserve safe, clean and affordable housing. Comments on Segregation and negative impacts on lower-income and black populations.</p> <p>Comments that not providing affordable housing has negative impacts. Notes that LA County residents have been requesting more affordable housing for 10 years.</p> <p>Comments that poverty is a failed policy and that we must build more housing in all communities in Redondo Beach, especially in single family zones.</p>	<p>The City is currently investigating the development of an “inclusionary housing” ordinance that could serve to further the City’s intentions to build more affordable housing throughout the City at locations in addition to the recommended housing sites in the draft housing element. The City’s development of an “inclusionary housing” ordinance is outlined in Program 3 of the draft housing element.</p>

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			<p>Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p> <p>Recent changes in State housing laws, Senate Bill (SB) 9, allow for the subdivision of R-1/small lots.</p>
09.03.2021	Marianne Teola, Resident	<p>Comments on the thoroughness and significant research went into the document. Expressed disappointment with short notice for providing comments, received email day before comments due. Suggests that a summary of the main points of the Housing Element be attached to the element. Asks the question, how will the City be impacted by the recommendations in the element?</p> <p>Comments on the difference between a single-family residence in District 1 vs. District 3. Questions the allowance of “third floors” in single family residences. Requests that a zoom meeting with the average citizen be scheduled to discuss the plan. Asks questions about the Beach Cities Health District.</p>	<p>Due to the length of time that it took the State (HCD) and the Southern California Association of Governments (SCAGs) (and its member jurisdictions including the City of Redondo Beach) to complete the 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) process, inclusive of the appeal process, coupled with the State’s 60 day review period and deadline for</p>

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			<p>adoption of the City’s housing element, October 15, 2021, the schedule for engaging the public was severely compressed. The City plans to continue the public engagement process through and beyond the adoption process to ensure compliance with State law on this matter.</p> <p>The “Administrative Reports” for both the September 16, 2021 Planning Commission public hearing as well as the City Council’s October 5, 2021 public hearing includes comprehensive summaries of the housing element and are linked to the City’s PLANredondo webpage.</p> <p>The City’s public hearings are accessible to all interested parties and opportunities for questions and comments were afforded to the public during said meetings. Additional future meetings on the housing element will be advertised and open to the public.</p> <p>Any concerns with zoning development standards, “third floors” can be</p>

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			addressed to the City’s GPAC as they continue to review the update to the City’s General Plan Land Use Element. Information of past and upcoming meetings of the GPAC are on the City’s PLANredondo webpage.
09.13.2021	Mark Nelson, Resident – BCHD Volunteer	Comments on “Planning Commission Resolution No. 2021-**-PCR-**” citing an inaccuracy regarding outreach. Provides additional comments on the BCHD entity, their proposed project and their project review process to date.	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The Beach City’s Health District (BCHD’s) planned project will require entitlements to be issued by the City prior to its development at which time additional analysis and reviews will be conducted by the City including taking public testimony/input/questions.</p>
09.13.2021	Mike Martin	Comments on the Land Use Category Descriptions for Public/Institutional (PI), Public/Utility (U), and Parks and Open Space (OS) descriptions.	Any concerns with Land Use Category Descriptions and standards concerning

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			Public/Institutional (PI), Public/Utility (U), and Parks and Open Space (OS) descriptions, can be addressed to the City’s GPAC as they continue to review the update to the City’s General Plan Land Use Element and Parks, Recreation, Open Space and Conservation Elements. Information of past and upcoming meetings of the GPAC are on the City’s PLANredondo webpage.
09.14.2021	Our Future LA, Steering Committee Members	<p>Commenter provides multiple statistics concerning Black and Latino housing issues and attributes the effects to “decades of racist policies” that still remain. Cites restrictive covenants, exclusionary zoning, redlining, the California Constitution’s Article 34 and local “crime-free housing” policies as contributing towards racial divisions.</p> <p>Commenter presents disproportionate statistics concerning COVID and cites overcrowding in Black and Latino neighborhoods as reasons for higher infection/death rates.</p> <p>Commenter cites that LA County ranks last in the US in terms of housing affordability, overcrowding, and homelessness. States that lower-income Black, Latino and AAPI families are being pushed out of their homes/communities at alarming rate.</p> <p>Cites that LA County is only expected to build 7% of required housing by 2030 and shortfall will impact Black and Latino families disproportionately.</p>	<p>The City’s Affirmative Furthering Fair Housing (AFFH) appendix of the City’s draft housing element includes the following components pursuant to Assembly Bill (AB) 686:</p> <ul style="list-style-type: none"> <li>• Summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity;</li> <li>• Analysis of segregation patterns and disparities in access to opportunities;</li> <li>• Assessment of contributing factors; and</li> <li>• Identification of fair housing goals and actions.</li> </ul>

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		<p>Commenter notes making every neighborhood resource-rich will create better housing future. Housing Element must consider intersection between housing, public health, and environmental justice. Cites a number of statistics concerning low-income people of color bearing brunt of negative impacts of poor air and soil qualities.</p> <p>Commenter doesn't believe the draft housing element provides equity and affordability and wishes to meet to discuss the following:</p> <p><u>Protections</u></p> <ul style="list-style-type: none"> <li>• Expand just-cause eviction protections.</li> <li>• Implement local RSO or strengthen/reduce the annual allowable rent increases.</li> <li>• Codify tenant's right to council for evictions.</li> <li>• Strengthen tenant education programs.</li> <li>• Create tenant anti-harassment ordinance.</li> </ul> <p><u>Preservation</u></p> <ul style="list-style-type: none"> <li>• Prioritize rezoning in high-resource neighborhoods which are transit- and job-rich, including single-family zones.</li> <li>• Exclude parcels containing RSO housing units in site inventory.</li> <li>• No net loss provisions should apply to site inventory parcels and include rezoning program with monitoring/implementation.</li> <li>• Institute local program and funding sources for preservation of existing affordable housing.</li> </ul> <p><u>Prioritization of affordable housing</u></p> <ul style="list-style-type: none"> <li>• Include inclusionary zoning to locally fund/incentivize affordable housing.</li> <li>• Prioritize creation of affordable housing on public land.</li> </ul>	<p>As confirmed in the AFFH appendix, all of the City's neighborhoods are determined to be "high resource areas" which supports the good health of future neighborhood populations as affordability and integration is realized as a result of the implementation of the City's housing element with the recommended land uses and housing programs.</p> <p>City staff and the City's housing consultant plan to initiate meeting(s) to confirm with the Our Future LA Steering Committee Members (commenter).</p> <p><u>Protections:</u> The City of Redondo Beach contracts with the Housing Rights Center (HRC) for fair housing services. The Housing Rights Center investigates and resolves discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars.</p>

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		<ul style="list-style-type: none"> <li>• Streamline affordable housing production.</li> <li>• Include programs for 100% affordable housing zoning overlays and apply to high-opportunity and R1 areas.</li> </ul> <p><u>Site Capacity Assessment</u></p> <ul style="list-style-type: none"> <li>• Report the realistic capacity vs. estimated realistic capacity for both vacant and nonvacant sites.</li> <li>• Commenter estimates draft housing element will fall short of RHNA by 2,575 units of realistic capacity.</li> <li>• Report proportion of sites from previous housing element’s inventory that were developed during the previous planning period and utilize HCD recommended methodologies/data sources/factors for realistic development capacity.</li> <li>• Survey owners of nonvacant housing sites to determine likelihood of being discontinued during the planning period.</li> <li>• A buffer of 15-30% capacity should be included in sites inventory.</li> <li>• Provide quantitative estimate of in-pipeline projects likely to be completed based on historical data and adjust accordingly.</li> <li>• Commit to mid-cycle review.</li> </ul> <p><u>Affirmatively Furthering Fair Housing</u></p> <ul style="list-style-type: none"> <li>• Increase the concentration of lower-income households in areas where concentrations are low.</li> <li>• Reduce the concentration of lower-income households in areas with significant exposure to noise/pollution.</li> <li>• Ensure community-serving investment in historically disinvested areas to gain affordable housing/stop displacement, while prioritizing environmental justice, community health, and strengthen equitable community leadership in planning.</li> </ul>	<p>They also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. Additional measures per the commenter are under further consideration by the City.</p> <p><u>Preservation:</u> The City has instituted all suggested measures of preservation with the exception of the development of a local program and funding sources for preservation of existing affordable housing. The City is further considering adding this measure to the existing “program” to address this matter.</p> <p>The City has incorporated some of the commenters suggested measures regarding Prioritization, Site Capacity Assessment, and Affirmative Furthering Fair Housing, and intends to further consider additional noted measures in future meeting(s) with this</p>

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		<ul style="list-style-type: none"> <li>• Analyze local patterns in socioeconomic/racial segregation and integration.</li> <li>• Prioritize high-opportunity census tracts and well-resourced areas when selecting sites for lower-income housing.</li> <li>• Identify funding sources/public resources/density bonus programs to maximize likelihood of below market rate units are built.</li> <li>• Solicit public feedback/commentary on housing element reflecting City’s socioeconomic makeup.</li> <li>• Utilize HCD recommended safe harbor methodology for forecasting future ADU development.</li> <li>• Provide mid-cycle adjustments in inventory sites/ADU development is less than projected. Mid-cycle adjustments should automatically implement by-right density bonus large enough to make up for ADU shortfall.</li> <li>• Use city-specific data (instead of regional) for assessing projected affordability of ADUs.</li> </ul>	<p>organization. Concerning “<u>Prioritization</u>” the City is currently investigating the development of a Citywide inclusionary housing ordinance. Concerning “<u>Site Capacity Assessment</u>” the City is conducting surveys with the property owners of the recommended housing sites. Concerning “<u>Affirmative Furthering Fair Housing</u>” since all of the City’s neighborhoods are qualified as “high resource”, all future affordable housing will benefit within Redondo Beach.</p>
09.15.2021	Abundant Housing LA/YIMBY Law	<p>Commenter supports more housing at all levels of affordability and reforms to land use and zoning to improve affordability, access to jobs/transit, environmental sustainability, and racial/economic equity.</p> <p>Commenter cites and summarizes their earlier letter dated May 20, 2021. Noted inconsistencies of draft housing element with state housing element law and AFFH, and HCD’s instructions for housing element design and implementation. Also referenced their October 2020 communication sharing their “best practices” for housing element updates.</p> <p>Commenter cites HCD’s September 2, 2021 letter identifying, “revisions will be necessary to comply with State Housing Element Law”.</p>	<p>The City also supports more housing at all levels of affordability as described and programed in the draft housing element.</p> <p>HCD’s September 2, 2021 letter has requested additional information concerning the North Tech District housing site and the contiguous small lot sites located along 190<sup>th</sup> and one small lot site on Pacific Coast Hwy. City staff continues to investigate these housing sites and has engaged property owners to confirm and, in some cases,</p>



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		<p>Commenter provides a summary table that includes deficiencies, HCD’s comments from their September 2, 2021 letter, Abundant Housing LA (AHLA)/YIMBY Law comments, and AHLA/YIMBY Law policy recommendations. The following is a summary list of AHLA/YIMBY’s policy recommendations:</p> <ul style="list-style-type: none"> <li>• Rezone parcels located near transit, job centers, schools, and parks to expand housing supply in high- and highest-resource areas, including R1 parcels.</li> <li>• Reduce concentration of lower-income households in neighborhoods with high concentrations of low/moderate income households or with high pollution.</li> <li>• Identify new funding sources/public resources for production/preservations of affordable housing including real estate transfer tax, congestion pricing, local density bonus, and abatement of polluting infrastructure.</li> <li>• Exempt parcels containing affordable housing to prevent displacement of vulnerable households.</li> <li>• Annually monitor “no net loss” and include rezoning implementation program.</li> <li>• Include offering publicly-owned land at no cost to nonprofit affordable housing developers as a state density bonus law concession.</li> <li>• Create 100% affordable housing zoning overlay for high-opportunity neighborhoods including R-1.</li> <li>• Provide quantitative estimate of site’s realistic capacity. Commenter references “Survey Method” or “Historical Redevelopment Rate Method”.</li> <li>• Report sites developed during prior planning period.</li> <li>• Share interest letters with planned development descriptions from owners of site inventory parcels.</li> <li>• If City lacks enough suitable sites to achieve RHNA, don’t add more theoretical units to existing sites, rezone additional parcels.</li> <li>• Commit to mid-cycle review to verify assumptions and adjust if necessary.</li> <li>• Provide quantitative estimate of “in-pipeline projects” and adjust if necessary.</li> </ul>	<p>reconfirm support for the identification of the subject properties as potential sites for future high density residential and/or mixed use. To date staff has confirmed significant interest from the property owner of the largest shopping center in the North Tech District for the future additional development of high density residential at this location. Additionally, none of the property owners of the small sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties. Staff is continuing to investigate these sites. Staff does not anticipate that HCD will not accept the proposed housing sites based upon the overwhelming interest by property owners for potential high density residential on the determined housing sites per the draft housing element.</p> <p>The City has incorporated or plans to incorporate some of the many policy recommendations cited by the commenter including: The sharing of interest letters for future development</p>

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		<ul style="list-style-type: none"> <li>• Create local density bonus program that also applies to low-density parcels.</li> <li>• Pre-approve standard ADU's, small-scale multifamily and small lot subdivision housing plans.</li> <li>• Expand and speed up ministerial review process.</li> <li>• Eliminate on-site parking requirements.</li> <li>• Reduce restrictions on development standards.</li> <li>• Reduce fees on multi-family residential development.</li> <li>• Survey/poll online and hardcopy formats in top languages spoken in community regarding preferences/priorities for zoning and residential development.</li> </ul>	<p>from owners of housing sites; Updating the existing Residential Design Guidelines with objective design standards to further “expand and speed up the ministerial review process” (Program 14); Amendments to the City’s zoning ordinance consistent with State housing laws that serve to reduce/mitigate potential governmental constraints to housing production and affordability (Program 13); and The development of ADU guidelines that will be included within the City’s updated Residential Design Guidelines (Program 12).</p> <p>The following is a list of additionally proposed “programs” within the draft housing element that address and are consistent with the intentions of many of the policy recommendations from the commenter:</p> <p>Program 1: Mobility Access/Emergency Repair Program;  Program 2: Preservation of Affordable Housing;  Program 3: Inclusionary Housing;</p>

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			<p>Program 4: Housing Choice Voucher (Section 8) Program;            Program 5: Response to Homelessness;            Program 6: Affordable Housing Development;            Program 7: Green Task Force;            Program 8: Residential Sites Inventory and Monitoring of No Net Loss;            Program 9: By-Right Approval for Projects with 20 Percent Affordable Units;            Program 10: Replacement Housing; and            Program 11: Small Lot Development/Lot Consolidation.</p>
09.15.2021	Wally Marks, Property owner: 2810-2860 Artesia Boulevard	<p>Commenter supports the Housing Element document identifying ways in which the housing needs of existing and future populations can be met and its focus on improving affordable housing, finding more affordable housing and removing constraints.</p> <p>Comments on need for updating zoning and adopting an inclusionary housing ordinance.</p> <p>Comments on restrictions from past and current being prohibitive of housing development and recommends incentive based policies to create opportunities for more affordable units throughout Redondo Beach.</p>	<p>As noted by the commenter, the City’s draft housing element promotes and furthers the identification of ways in which the housing needs of existing and future populations can be met and focuses on improving affordable housing, finding more affordable housing, and removing constraints.</p> <p>The City is currently investigating the development of an “inclusionary housing” ordinance that could serve to further the City’s intentions to build more affordable housing throughout</p>

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		Comments on future opportunities for creative policies ensuring new housing of all types for all income levels and the benefit economically and otherwise to the community.	<p>the City at locations in addition to the recommended housing sites in the draft housing element. The City’s development of an “inclusionary housing” ordinance is outlined in Program 3 of the draft housing element.</p> <p>Included within the many “programs” contained in the draft housing element are initiatives to directly address past and current regulations that may serve as a constraint on housing while also including creative elements that promote more housing opportunities for all income levels throughout the City.</p>
09.16.2021	Alisa Beeli, Resident	<p>Commenter expresses concerns with the City’s 6<sup>th</sup> Cycle Housing Element and urges Planning Commission to reject it. Notes that the Housing Element places nearly all of the required units in 90278, which she states is unfair. Recommends it is better (more equitable) to distribute the units through the entire City</p> <p>Commenters concerns:</p> <ol style="list-style-type: none"> <li>1. Plan places nearly all new units on edges of City, which are highly trafficked and border Lawndale and Torrance, which have their housing requirements.</li> <li>2. All the overlay zones are adjacent to less affluent areas of the City and all in North Redondo. Plan does not provide increased housing in more affluent, beach-adjacent communities in South Redondo. Cites that State law prohibits the</li> </ol>	Proposed “housing sites” for potential future high density residential were not necessarily based on existing traffic patterns but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that the City’s existing and planned/proposed Metro stations are in close proximity to the proposed high-density housing sites as opposed to areas in South Redondo that are

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		<p>concentration of low-income housing in one location. Questions how Housing Element can be considered in current state.</p> <p>3. North Tech is estimated to accommodate 28%of the required units. Questions whether the current property owners plan to relocate? Questions health impacts from freeway for residential at this site. Also claims it is a 45-minute commute to high school.</p> <p>4. City Council ignored the Planning Commission’s recommendation for 50% of power plant site to be zoned at 30 units per acre and hundreds of public emails and statements asking to consider sites within 90277.</p> <p>5. Redondo Beach completed 40% of its 5<sup>th</sup> Cycle RHNA. Commenter doesn’t think the City will meet its requirement for 2,490 units as currently planned.</p> <p>Asks the City to work toward a more equitable distribution of the housing units throughout the entire City.</p>	<p>much further from existing and proposed regional transportation rail stations. Housing sites are located in multiple locations which is consistent with State law.</p> <p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>Any future redevelopment of high density residential within the any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan</p>

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			<p>update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including the power plant site. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>

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			The City is not required to build the housing but rather to ensure there is capacity with the correct high-density residential zoning to accommodate the required housing at the required income levels.
09.17.2021	Mary Schurr, Resident	<p>Commenter expresses that the best place for high density housing is the 50-acre Power Plant site. Cites that 500 persons expressed this sentiment as part of the City’s Social Pin Point land use plan survey.</p> <p>Supports the development of housing at 1021 and 1100 N. Harbor Drive and cites the property owners’ letter. Also cites the Planning Commission’s recommendation for housing at the 50-acre site.</p> <p>Cites percentage of housing developed during 5<sup>th</sup> Cycle as 40%. Doesn’t believe the City will meet 6<sup>th</sup> Cycle requirement for 2,490 units.</p> <p>Cites City’s solution is to place housing on fringes of City. All housing sites are adjacent to other “less affluent jurisdictions”.</p> <p>Cites list of reasons why many of the identified housing sites are not likely to be developed:  <u>North Tech Site</u></p> <ul style="list-style-type: none"> <li>• Existing development not likely to shut down/relocate.</li> <li>• If any residential is developed they will have a 45-minute commute to Redondo Union High School.</li> <li>• Would not be near any amenities.</li> </ul> <p><u>South Transit Site</u></p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including 1021 and 1100 North Harbor Drive sites. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and</p>

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		<ul style="list-style-type: none"> <li>• Cites property owner is working on a project that does not include residential. <u>South Bay Galleria</u></li> <li>• Should have more residential. There is an EIR for 650 units.</li> </ul> <p>Cites that City is losing its small-town charm. Development is out of control. Parking in the streets is severely impacting neighborhoods. Increased traffic on Artesia Blvd is not safe. North Redondo is overdeveloped now. Does not support more housing in North Redondo.</p> <p>Don't allow zoning on unlikely properties while ignoring large parcels next to the beach/bike paths/parks.</p>	<p>future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city's overall highest residential density remains within the southern area of the City.</p> <p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>South Transit Center site – City staff continues to investigate this site and has engaged the property owner(s) to confirm and, in this case, reconfirm support for the identification of the subject property as potential sites for</p>



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			<p>future high density residential and/or mixed use. Staff does not anticipate that HCD will not accept the proposed housing site at the South Transit Center as they did not request additional information regarding this property. Finally concerning this site, during the many GPAC meetings specific interest from representatives of this site requested that the GPAC recommend this site for high density residential, citing the sites close proximity to the City’s Transit Center under construction and the future planned Metro station.</p> <p>To date staff has confirmed interest from many of the property owners of the recommended housing sites for the application of a high-density Residential Overlay designation on their properties. Additionally, none of the property owners of the sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties.</p>

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			Staff does not anticipate that HCD will not accept any of the proposed housing sites.
09.22.2021	Robert Doran, Director of Development & Construction, Redondo Beach Plaza (North Tech District – Housing Site)	<p>Commenter (property owner of Redondo Beach Plaza-North Tech District Site) supports the identification of the Redondo Beach Plaza as a “housing site”. See email comment below.</p> <p>“ROIC would welcome the opportunity to introduce High Density Residential to our Redondo Beach Plaza. I have attached some examples of other properties we own where we have recently completed or are in the process of entitling/permitting densification efforts which includes residential components.”</p>	North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.
10.04.2021	James Light, Resident (GPAC Member – Comments on the proposed Housing Element CEQA document – The Initial	<p>Commenter raised concerns with the adequacy of the environmental documents in support of the Housing Element. Commenter claims that the negative declaration relies on two (2) flawed/inaccurate conclusions:</p> <ol style="list-style-type: none"> <li>1. That the Housing Element is only a policy document and therefore does not require CEQA analysis.</li> <li>2. That the Housing Element does not create changes that impact certain analysis elements and that any analyses would be accomplished in conjunction with each future specific project.</li> </ol> <p>States that even policy documents are subject to CEQA.</p>	The 2021-2029 Housing Element provides a framework for the City to identify opportunities to increase the housing stock within the City to accommodate the City’s RHNA allocation. The document identifies strategies and programs to conserve and improve existing affordable housing; provide adequate housing sites; assist in the development of affordable housing; remove governmental and other constraints to

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	Study/ Negative Declaration was available for public review for 30 days beginning August 5, 2021 and ending September 3, 2021)	<p>Commenter supports deferring the analysis to the EIR to be conducted for the General Plan update. Requests that the ISND be modified to remove “flawed/inaccurate” conclusions that policy documents are not subject to CEQA analysis.</p> <p>States that the ISND intends to defer CEQA analysis to individual projects to avoid analysis of land use changes made by the City. Commenter states concerns that City is avoiding a required CEQA analysis of impacts and will use same argument concerning the upcoming CEQA analysis for the General Plan changes. States land use changes are a discretionary act by the City that can drive environmental impacts. Deferring to specific future projects would avoid the foreseeable cumulative impacts of all proposed zoning land use changes. CEQA intends that the public understand potential impacts of changes when proposed by the City. The IS/ND should be revised wherever this inaccurate conclusion is used.</p> <p>City Council should reject the IS/ND document as written and rewritten to reflect the housing element recommended zoning/land use changes will be analyzed as part of the PlanRedondo General Plan update process.</p> <p>Commenter appended his comments above with an example of case law, “City of Redlands v. County of San Bernardino (2002) 96 Cal.App.4<sup>th</sup> 398, at p. 409” which held that CEQA applies to revisions or amendments to an agency’s general plan...</p> <p>Stated that the negative declaration is wrong. The City cannot waive off CEQA analysis by stating the document is just a “policy document” or by deferring to a future specific project. The negative declaration should be rejected and the CEQA analysis rolled in with the PlanRedondo General Plan Amendment.</p>	<p>housing development; and promote equal housing opportunities in a strategic manner. The City clearly agrees that CEQA analysis is necessary for the Housing Element and therefore, prepared the Negative Declaration. As such, the Housing Element is a policy document, and did require a CEQA analysis which was done.</p> <p>As indicated in the Negative Declaration, the land use designations and zoning amendments necessary to fully implement the Housing Element are not being considered at this time and will be considered and evaluated as part of the PLANRedondo process. The EIR that will be prepared for PLANRedondo will evaluate the potential environmental impacts that could occur from full buildout of the Plan. The City is not deferring the analysis but will consider all the necessary General Plan and Zoning amendments associated with the Preferred Land Use Plan that was approved by Council in May 2021. The amendments necessary to fully</p>

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			<p>implement the Housing Element are a subset of the amendments that will be considered as part of PLANRedondo. The timing for the adoption of the Housing Element, which was separated from the PLANRedondo, is to meet the October 15 deadline that is imposed by the State. The Housing Element stipulates that the City must complete the land use and zoning amendments by November 2023, either as part of or regardless of the adoption of PLANRedondo to ensure consistency between the 2021 Housing Element and the General Plan at that time.</p>
10.04.2021	Warren Chun, Resident	<p>21-year resident.</p> <p>Requests the Mayor and City Council consider a balanced approach in the placement of affordable housing locations between South Redondo and North Redondo.</p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>

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10.04.2021	Guernsey, Resident	<p>30+ year resident.</p> <p>Redondo Beach is one city. Commenter states that it makes sense to add new homeless units near El Nido neighborhood but next ones, if any, should go in South Redondo. Also fine with new 30+ new units near edge of commenter’s “R1” neighborhood and with Friendship Foundation planned next to Franklin Park. Commenter objects to “unfair amount of new housing to go into “North Redondo”. Requests City do what’s right overall for “our ONE city”.</p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
10.05.2021	Grace Peng, PhD, Resident	<p>Commenter frustrated with City’s 6<sup>th</sup> Cycle 2021-2029 Draft Housing Element. States it does not meet City’s needs nor meet intent of Federal law for Affirmatively Furthering Fair Housing (AFFH).</p> <p>Housing Element should consider Jobs-Housing fit to not increase traffic.</p> <p>Comments on North Redondo being a tech center generating large numbers of jobs and attracting two-tech worker families that value short commutes to work and school, and coastal South Redondo being a beach community attracting tourists, retirees, and singles and inland South Redondo attracting families. South Redondo is a generator of low-income jobs. Comments that City needs to add housing in proximity of the service’s essential workers.</p> <p>Comments on eldercare workforce issues.</p>	<p>Regarding the commenter’s concerns with Redondo Beach’s Jobs-Housing ratio the following is presented.</p> <p>In support of the City’s ongoing General Plan Update the City commissioned a comprehensive and robust “Demographic and Economic Trends Analysis”. Included within this analysis was detailed data concerning the City’s employment and labor trends. The analysis highlighted the comparison of resident employment and available jobs in Redondo Beach and quantified the mismatch between residents’ professions and the opportunity to find</p>

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		<p>States that the current HE puts almost all the low-income housing at the extreme Northeast corner of the City. States the City will be providing homes for low-income workers of other Cities not Redondo Beach.</p> <p>Comments that North Redondo parents are frustrated by over-crowded schools. States there is less school crowding in South Redondo and more family homes should be built there.</p> <p>Comments that the draft element puts all the very low-income housing in the most polluted area of the City. Cites distances, noise, air pollution will stress children on way to school. Not AFFH.</p> <p>States that HE would put all low-income children in Adams MS which has twice as many as Parras MS. States that the additional low-income students into existing schools with higher proportions of low-income students is not compliant with AFFH.</p> <p>States most segregated schools are in South Redondo and are the least crowded requiring those schools to attract students outside their area, which generates traffic. States one third of morning traffic is school drop-off. New housing in South Redondo would reduce this. Presents table with current RBUSD student demographics in support of above assertions.</p> <p>Asserts justice and the law requires that we balance the benefits and burdens of new residents to improve the lives of our new residents. States that research/evidence shows that children who attend racially and economically integrated schools have the best outcomes.</p>	<p>employment within that profession within the City. The most significant commuter flow data documented that over 92.5% of the employed residents of the City of Redondo Beach commuted to their jobs which were outside the City. The total outflow of Redondo Beach workers is 30,527 (source US Census LEHD, 2014; BAE, 2017). Redondo Beach also imports much of its retail and service sectors workforce from other jurisdictions; however, that number is significantly less than the net outflow of the Redondo Beach residents commuting for work. The following are the key data points from the City’s recent economic analysis.</p> <ul style="list-style-type: none"> <li>• The most significant commuter flow data documented that over 92% of the employed residents of the City of Redondo Beach commuted to their jobs which were outside the City.</li> <li>• There is an existing demand for approximately 400,000 square feet</li> </ul>

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		<p>To address cited concerns, commenter recommends spreading new housing throughout the city.</p> <p>Asks why fees for new single-family homes are lower than fees for multifamily homes. States that is backwards.</p> <p>Commenter recommends removing current residential height restrictions to increase housing capacity. States advances in elevator technologies to make higher buildings more feasible and attractive for medically-fragile residents.</p> <p>Notes additional advances in building technologies and recommends the City allow recycling of multi-family as well as SFHs throughout the City and build mid-rise of up to 11 stories.</p> <p>Recommends amending parking regulations and base on unit size/type and generally reduce required parking to reduce housing costs.</p> <p>Commenter submitted additional analysis of the 2020 Census Data compared to 2010 Census Data using an interactive map program. Reports that data infers coastal South Redondo is losing both homes and people, particularly in the harbor area. Recommends gaining people in the Riviera Village or adding people without adding homes near Beach Cities Health District. Presents table with Census Tract population/homes data for 2010 and 2020.</p> <p>States that RHNA requires City to provide 8% more homes in 8 years. Claims City has only provided 15 in last 10 years. Recent development trends won't meet needs of our children or RHNA. Claims we are adding people mainly because adult children are living with their parents for lack of affordable alternatives.</p>	<p>of professional office space in Redondo Beach.</p> <p>According to the most recent SCAG Regional Transportation Plan (2016), Redondo Beach had a Jobs-to-Household Ratio of 0.83 in 2012. This indicates that there were only approximately 0.83 citywide jobs per Redondo Beach household, one of the lowest ratios in the South Bay.</p> <p>Additionally, with recommended housing site locations for low-income housing adjacent to the Galleria, along 190<sup>th</sup> Street, and along South/Central Pacific Coast Hwy, there are ample options for in-proximity housing for the City's service related workforce in South Redondo. Even the low-income housing recommended at the North Tech location is within a large shopping center (that per the property owner would be retained) and in close proximity to another large shopping center within ½ a mile distance and less than 2 miles from the Aviation/Artesia commercial corridor and less than 6</p>

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		<p>States that entire region is experiencing the same housing affordability issues as Redondo Beach. Long commutes which generates horrible traffic and parking problems while at the same time essential workers can't find a place to live in the communities they serve.</p> <p>Recommends:</p> <ul style="list-style-type: none"> <li>• Building workforce housing at all income levels in the neighborhoods where the jobs are located.</li> <li>• Build safe and supportive cycling infrastructure so that people can commute safely by bike even after dark.</li> <li>• Work with Metro and local transit agencies to provide more frequent buses.</li> <li>• Build transit-oriented housing near the train stations and high frequency bus corridors.</li> </ul>	<p>miles from the furthest South Redondo service jobs. It's important to note that most trips for the service workforce take place outside AM and PM peak travel times making additional potential local traffic impacts minimal.</p> <p>After carefully reviewing the commenter's data regarding balanced school integration there is nearly an identical average % of low-income elementary student ratios between the elementary schools in North Redondo, 14.2%, and South Redondo, 13.3%, which over time will create more balance than the current discrepancy between Adams MS and Parras MS. Additionally, all of the recommended housing sites locations are in close proximity to numerous Elementary Schools and over half of the recommended sites are near both Junior High Schools and Redondo Union High School.</p> <p>Regarding the commenter's concerns with the location of the recommended housing site in proximity to the freeway</p>



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			<p>and the stress of potential air and noise pollution on children the following is presented.</p> <p>Any future redevelopment of high density residential within any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designations, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p>

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			<p>Regarding costs associated with single family developments versus multi-family developments, the City, as are all public agencies, bound by State law to only charge fees pursuant to the time and costs associated with the review of the development project. There must be a rational nexus for any fees charged by the City and single-family developments are less complicated and as a result typically require much less time and are therefore assessed less fees to process. The City cannot manipulate fees to incentivize one development type over another.</p> <p>Regarding the commenter’s recommendations for relaxing residential development standards, including building height, stories, and parking requirements the following is presented/recommended.</p> <p>As the City continues to review and update its General Plan Land Use Element future opportunities exist to engage the process for the introduction of revising existing land use policies</p>

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			<p>and ultimately zoning ordinance residential development standards including height, stories, and parking. The City’s General Plan Advisory Committee (GPAC) will conduct five (5) more PLANRedondo meetings, of which three (3) will be focused on land use element policies. The commenter is encouraged to participate in these futures publicly noticed meetings and request consideration of her recommendations. The noted GPAC meetings are planned for Spring 2022.</p> <p>The commenter’s summary recommendations concerning workforce housing for all income levels and all neighborhoods, safe and supporting cycling infrastructure, coordinating with Metro and local transit agencies to increase frequency of buses, and development of transit oriented development are in some cases already reflected within the 6<sup>th</sup> Cycle 2021-2029 Housing Element, for example, the two largest housing sites for lower income housing are sited in proximity to an existing and proposed</p>

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			<p>Metro rail stations. Also the City’s accessory dwelling unit ordinance and plan to implement an inclusionary housing ordinance will serve to provide affordable housing in neighborhoods throughout the City and furthering balancing locations for future affordable housing and locating it near job centers for all types of workers. Concerning cycling infrastructure and Metro and transit agency coordination, although the City is not currently updating its Circulation Element it is anticipated that an update to this General Plan element will be initiated during this Housing Cycle and the commenter is again encouraged to work with the GPAC to introduce policies that could be placed in the Land Use element to ensure these topics are clarified and pursued further when the City updates its Circulation Element.</p>