### **BLUE FOLDER ITEM**

Blue folder items are additional back up material to administrative reports and/or public comments received after the printing and distribution of the agenda packet for receive and file.

# October 5, 2021

L.1. PUBLIC HEARING FOR CONSIDERATION OF THE CITY OF REDONDO BEACH 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND CERTIFICATION OF AN INITIAL STUDY/NEGATIVE DECLARATION

ADOPT BY TITLE ONLY RESOLUTION NO. CC-2110-095, A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDONDO BEACH, CALIFORNIA, ADOPTING THE CITY'S 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND ASSOCIATED CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION, INITIAL STUDY/NEGATIVE DECLARATION

### CONTACT: BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR

Public written comments received after release of agenda

From: JAMES LIGHT

Sent: Monday, October 4, 2021 10:52 AM

**To:** Eleanor Manzano <<u>Eleanor.Manzano@redondo.org</u>>; Bill Brand <<u>Bill.Brand@redondo.org</u>>; Nils Nehrenheim <<u>Nils.Nehrenheim@redondo.org</u>>; Todd Loewenstein <<u>Todd.Loewenstein@redondo.org</u>>;

Zein Obagi <<u>Zein.Obagi@redondo.org</u>>; Angel Frank <<u>fangel@angellaw.com</u>>

Subject: Comments on 5 Oct 21 City Council Agenda Item L1

[City Logo] ATTN: Email is from an external source; Stop, Look, and Think before opening attachments or links.

The negative declaration included in City Council Agenda L1 related to the approval of the new Housing Element relies on two flawed/inaccurate conclusions. I request the City Council REJECT that the Initial Study/Negative Declaration as currently written and send the document back to be rewritten.

The negative declaration relies on two inaccurate and flawed conclusions:

- 1) That the Housing Element is only a policy document and therefore does not require CEQA analysis. When this conclusion is used, the negative declaration states an analysis will be completed in conjunction with the approval of the PlanRedondo general plan revisions.
- 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 specific project.

The first conclusion is inaccurate. A zoning change that changes land uses is certainly a policy document that is subject to CEQA evaluation. The document is discretionary, in that the contents are subject to the approval of the City Council. And the document foreseeably drives environmental impacts. Using this as an excuse to avoid analysis is in conflict with CEQA.

I agree that the Housing Element is but one element of the broader General Plan and that the General Plan and Housing Element must be in congruence. To that extent, and to the extent the General Plan is still a work in progress, I support deferring the analysis to the EIR to be conducted for the General Plan. The document should be modified to remove the flawed/inaccurate conclusions that policy documents are not subject to CEQA analyses.

The second conclusion is even worse. It intends to defer CEQA analysis to individual projects to avoid analysis of land use changes made by the City. CEQA does not allow such deferral and it is a slippery slope for Redondo to document this as an excuse for avoiding a required CEQA analysis of impacts. The City could easily then state that CEQA analysis of the upcoming General Plan changes could be deferred to specific projects. This excuse does not meet the requirements of CEQA. Land use changes are a discretionary act by the City and they can foreseeably drive environmental impacts. Deferring to specific project would avoid the analysis of the foreseeable cumulative impacts of all the proposed zoning land use changes. CEQA's intent is that the public understands the potential impacts of changes proposed by a City. Furthermore, the City regularly relies on the zoning change EIR when approving specific projects. Absent this zoning change EIR analysis, the specific project evaluation cannot be determined to be within the scope of the zoning change EIR. The document should be revised wherever this flawed, inaccurate conclusion is used.

I request the City Council reject the document as written and request it be rewritten to reflect the

Housing Element is one portion of the broader General Plan change and that zoning/land use change environmental impacts will be analyzed as part of the PlanRedondo General Plan update process.

VR

Jim Light
District 1, Redondo Beach
Sent from my iPad

From: JAMES LIGHT

Sent: Monday, October 4, 2021 3:39 PM

**To:** Eleanor Manzano < <u>Eleanor.Manzano@redondo.org</u>>; Bill Brand < <u>Bill.Brand@redondo.org</u>>; Todd

Loewenstein < Todd. Loewenstein@redondo.org >; Zein Obagi < Zein. Obagi@redondo.org >; Nils

Nehrenheim < Nils. Nehrenheim@redondo.org >

Subject: Additional Comment on 5 Oct 21 City Council Agenda Item L1

redondo redondo ATTN: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.

Eleanor,

Please append this to my first comment on Agenda Item L1:

As an example of case law that substantiates my concerns with the Housing Element General Declaration, please see the case below and quote from the decision. There are many more examples of substantiating case law.

The negative declaration is wrong. The City cannot waive off CEQA analysis by simply stating a document is just "policy" or by deferring to a future specific project. The negative declaration should be REJECTED and the CEQA analysis should be rolled in with the PlanRedondo General Plan Amendment EIR.

VR

Jim Light Sent from my iPad

### City of Redlands v. County of San Bernardino (2002) 96 Cal.App.4th 398, at p. 409:

"Not only does CEQA apply to revisions or amendments to an agency's general plan, but CEQA reaches beyond the mere changes in the language in the agency's policy to the ultimate consequences of such changes to the physical environment. A general plan embodies an agency's fundamental policy decisions to guide virtually all future growth and development. 'Even if a general plan amendment is treated merely as a "first phase" with later developments having separate approvals and environmental assessments, it is apparent that an evaluation of a "first phasegeneral plan amendment" must necessarily include a consideration of the larger project, i.e., the future development permitted by the amendment. Only then can the ultimate effect of the amendment upon the physical environment be addressed."

From: Warren Chun

Sent: Monday, October 4, 2021 7:49 AM

**To:** CityClerk < <u>CityClerk@redondo.org</u>>; <u>+Horvath.RBD3@gmail.com</u> **Subject:** City Council - My public comments for L.1 Housing Element

redondo

B E A C H ATTN: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.

Good Morning Mayor Brand and City Council,

I am a 21 year resident of North Redondo Beach.

Please consider a balanced approach in the placement of the affordable housing location between South Redondo and North Redondo.

Sincerely,

Warren Chun

From: redondo=comcate.com@mg.comcate.com < redondo=comcate.com@mg.comcate.com > On

Behalf Of City of Redondo Beach - Customer Service

Sent: Monday, October 4, 2021 12:20 PM
To: Melissa Villa < Melissa. Villa@redondo.org >

Subject: New Comcate Case: Mayor & Council>Public Comment on Agenda Item (you are owner)

redondo

B E A C H ATTN: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.

### Topic>Subtopic: Mayor & Council>Public Comment on Agenda Item

Case ID#: 37819

Case Created: 10/04/2021

Case Location:

Customer: Guernsey, Owner: Melissa Villa

Your role on this case: Primary Owner

Case Details: <a href="https://clients.comcate.com/reps/caseDetail.php?ag=23&id=1774566">https://clients.comcate.com/reps/caseDetail.php?ag=23&id=1774566</a>

First 200 Characters of Case:

This is in regards to addition of housing, as required by the State. Redondo Beach is ONE city, and in 30+ years living here (currently El Nido neighborhood in "North Redondo"), I've considered it as such. I try to be fair minded on City matters. For instance, I think it made the most sense to add the new homeless units near my neighborhood (but the NEXT ones, if any, can go in "South"), and I'm fine with 30+ new condo units being constructed on the edge of my "R1" neighborhood, and with Friendship Foundation facility planned next to Franklin Park (also in our neighborhood). But this City Council push for an unfair amount of new housing to go into "North Redondo" really disgusts me. Come on folks, stop catering to a selfish, snobbish mentality and do what's right overall. For our ONE city.

October 5, 2021

Honorable Bill Brand Mayor, Redondo Beach 415 Diamond Street Redondo Beach, CA 90277

### **Re: Housing Element**

Dear Mayor Brand, City Council Members and Planning Staff,

I am writing to you to express my frustration about the City's 6th Cycle 2021-2029 Draft Housing Element, which I will show does not meet our city's needs nor meet the intent of federal law for Affirmatively Furthering Fair Housing (AFFH).

The point of a Housing Element is to address the current and future needs of our city. This HE falls short. No one wants more traffic. Considering Jobs-Housing fit is how we add housing without contributing to traffic.

North Redondo is a tech center, generating large numbers of high income jobs and attracting busy two-tech worker families like mine that value short commutes to work and school. Coastal South Redondo is a beach community that attracts tourists, retirees, and singles of all ages. Inland South Redondo also attracts families.

South Redondo, like many areas with tourism and retirees, is a significant generator of low income jobs. In order to meet the needs of our area employers and the essential workers that feed and care for us, we need to add housing for them. Restaurants and bars close long after transit stops running in our area. Our Lobster Festival was cancelled for lack of workers. If we want enough hospitality workers, and for them to commute without cars, we need to allow them to move close to their jobs. If they live within walking or biking distance, then our businesses can have a flexible and available workforce.

Similarly, eldercare requires early morning and late evening shifts (up to 3 shifts a day), generating huge amounts of VMT. The best way to ensure that our elderly have access to the care they need is to provide nearby housing for their caregivers. You do not want to field calls from elderly relatives, waiting anxiously in wet diapers, for their evening caregivers who are stuck in traffic or had their car break down.

The current HE puts almost all of the low-income housing at the extreme Northeast corner of the city, on the other side of the 405 Freeway. We will be providing homes for the low-income workers of other cities, not for us. This is a self-inflicted wound.

North Redondo parents are frustrated by over-crowded schools. Some drive their children to South Redondo schools to escape overcrowding. Why don't we just build more family-sized homes in South Redondo so that children can walk or bike to school? This would reduce traffic.

I have previously written to you on April 10 about how the draft element puts all the very low-income housing in the most polluted area of our city, practically on top of the 405 Freeway. Children will have to walk 1.25 miles across freeway on/off ramps on Inglewood Ave to get to school, or take a 1.5 mile roundabout way via Manhattan Beach Blvd and Redondo/Vail Aves. They will arrive at school deafened by traffic noise, dosed with air pollution, and stressed by having to cross dangerous traffic. This is not AFFH.

The HE would put all of the low income children at Adams MS, which already has twice the percentage of low-income children as Parras MS. I highlighted the schools where the children in the North Tech site and the Galleria/Kingsdale sites would attend. Washington ES is already very large and teaches a higher than average proportion of low-income children. This is not AFFH.

AFFH applies within our city. Fortunately, our most segregated schools are the least crowded; they need to attract students outside their area (generating traffic). One third of our morning traffic is school drop-off. Putting new housing in South Redondo would help reduce this source of traffic.

### **Current RBUSD student demographics**

School	Zip Code	Student Pop	% Low Income	% White	% Hispanic	% Black	% Asian	% 2 or more
RUHS		3040	18	46	24	5	8	15
Adams MS	90278	1066	24	39	29	5	9	14
Parras MS	90277	1257	13	54	19	3	7	15
Tulita	90277	474	14	53	20	1	9	14
Alta Vista	90277	647	11	48	21	3	13	13
Beryl Heights	90277	458	15	55	18	2	7	17
Jefferson	90278	612	5	50	15	1	15	17
Birney	90278	457	14	43	24	2	12	18
Washington	90278	801	19	32	39	2	12	12
Madison	90278	488	22	34	29	5	13	15
Lincoln	90278	651	11	46	19	3	15	16

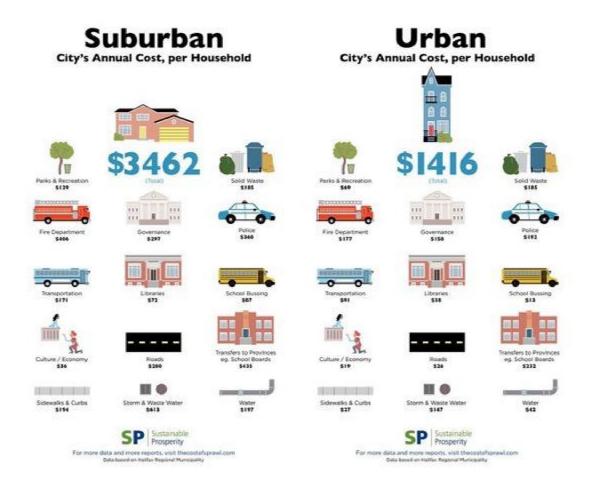
Justice and the law requires that we balance the benefits and burden of new residents to improve the lives of our new residents. By the way, research and evidence shows that children

who attend racially and economically integrated schools have the best outcomes. Sharing classrooms with low-income students will benefit students from high income backgrounds.

In following the spirit and the letter of AFFH by spreading new housing throughout the city, we would help existing residents and businesses. We would offer students to keep schools open, caretakers for our elderly and young, workers for our businesses. We could do this without worsening car traffic if we do some smart things.

HCD's September 2, 2021 letter to the city mentioned several administrative things we should correct.

Why do we require fees of \$18,902 for new Single Family Homes and a whopping \$29,612 for higher density homes? That backwards. SFHs are the most costly for the city to serve. The fee structure is backwards.



Why do we have such low height limits when we have old taller buildings throughout the city? They are fine. We should remove the 30'/38' height limits so we can increase housing capacity. This will help reduce costs per unit and make elevator buildings more affordable for seniors. In the last decade, elevators have halved their energy use by incorporating AI and coupling regenerative braking with backup batteries. This makes such buildings attractive for medically-fragile residents who need backup power.

Advances in Cross-Laminated Timber (CLT) have enabled construction of strong and beautiful mid-rise buildings around the world, even in earthquake zones). (Wood sequesters carbon while concrete parking structures produce it.)

We should allow recycling of multi-family as well as SFHs throughout the city. CLT can be used for mid-rise buildings of up to ~11 stories. So let's replace asbestos and lead-laden 50-70 year-old buildings with beautiful new ADA-compliant and energy-efficient homes.

Lastly, we need to do something about parking. So many people complain about parking, and we are ourselves the cause of the problem.

We require anomalously high amounts of parking per unit. We require 2 off-street resident parking spaces regardless of size or income level. Then we require another 0.5 visitor spots per unit. We know that larger families tend to have more cars. There is no reason why studios need to have 2 parking spaces except to artificially inflate the cost.

Low income households in LA County have 0-1 cars. Seniors have fewer cars. The data shows that requiring parking raises housing costs and encourages people to buy more cars. Parking minimums induce demand for cars. We want to provide homes for people, not attract more cars to our city.

Grace Peng, PhD

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L.1. PUBLIC HEARING FOR CONSIDERATION OF THE CITY OF REDONDO BEACH 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND CERTIFICATION OF AN INITIAL STUDY/NEGATIVE DECLARATION

ADOPT BY TITLE ONLY RESOLUTION NO. CC-2110-095, A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDONDO BEACH, CALIFORNIA, ADOPTING THE CITY'S 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND ASSOCIATED CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION, INITIAL STUDY/NEGATIVE DECLARATION

### CONTACT: BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR

Response to comments received on the Draft Housing Element

# 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	Commenter	Comment Summary	Draft Responses in progress and to be released prior to October 5, 2021 City
	Grace Peng, PhD, Resident	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.  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.  Notes multiple Federal, US Supreme Court, State, and Regional government sources of information related to provision of fair housing.  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.  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.  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.  Claims that Redondo Beach still bears the marks of "20th century racist zoning and lending practices". Cites a "mapping inequality" exhibit concerning lending	
		practices and demographic data in support.	not accept the proposed housing sites based upon the overwhelming interest by property owners for potential high

City should up zone all R1 zones to R2 or R3, and give incentives to combine lots for building even more densely.

Cites a USC study that found in high rent areas a higher percentage of inclusionary (subsidized housing) can be supported.

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.

City should put housing above parking lot in Riviera Village and incentivize lot consolidation for mixed use in Riviera Village.

Notes benefits of reducing segregation and includes a table with student economic and racial demographic information per school in Redondo Beach.

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.

Concludes with request that the City do better and more equitable zoning.

Includes Appendixes with CalEnvironScreen data per City Census Tract, School Populations with Economic Data.

density residential on the determined housing sites per the draft housing element.

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.

No Northrop Grumman properties are included as future 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

04.12.2021	Therese Mufic Neustaedter	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	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.  The City's existing residential density in the southern part of the City is the densest. Proposed "housing sites" for
		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.	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.  See responses above to commenter
			Grace Peng, PhD.
05.11.2021	RUTAN & TUCKER, LLP, Attorneys representing	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.	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months
	fee owners of the 50- acre site on	Comments on current status of the AES Power Plant permits to operate per the California State Water Resources Control Board.	concerning housing sites at locations throughout the City. After carefully considering the public's input and the
	which AES operates	Comments on property owners plans for re-use of the Power Plant site.	hundreds of comments/requests received, the City Council at their public
		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	meeting on June 15, 2021 approved the

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		prototypical "underutilized" property that State Law has determined should be	housing sites as identified within the
		made available for future development.	draft housing element.
		Comments that owner has developed a plan for closure and clearing of the site by	The property owner of the largest
		2027. Could have approximately half the site developed with residential by late	shopping center in the North Tech
		2025.	District has expressed enthusiastic
			support for the allowance of high
		Comments that North Tech area site is less suitable for redevelopment and may	density residential on their property
		not qualify due to the following: Proximity to freeway and adjacent industrial uses;	while maintaining their existing
		Opposition by Northrup Grumman; eliminating commercial and industrial areas	commercial center. Additionally, the
		reducing local jobs and tax base; staggered leases which may make some areas	property owner has recent experience
		unavailable; and elimination of last mile distribution of goods movement facilities.	with introducing high density
			residential within existing older
		Comments that Power Plant site is superior location for large commercial or	shopping centers that retain existing
		mixed-use campus that held remedy City jobs/housing imbalance. Owners	commercial and are located in close
		contemplating:	proximity to freeways.
		750 residential units	
		300 key hotel	Northrop Grumman has not expressed
		750,000 sf of office (20% studio/production space)	any opposition to the introduction of
		150,000 sf of retail, restaurant and event space	the proposed residential overlay on the North Tech District site.
05.11.2021	DUTANO	Comments that this growth 1021 N. Hardwaria a suitable bassing site assurant	
05.11.2021	RUTAN &	Comments that this property, 1021 N. Harbor is a suitable housing site surrounded	The General Plan Advisory Committee
	TUCKER, LLP,	by other high density residential developed sites.	(GPAC), Planning Commission, and City Council conducted multiple public
	Attorneys representing	Property owner requests that the City Council allow for residential uses at a	meetings over many months
	fee owners	density of no less than 30 DU/AC.	concerning housing sites at locations
	of 1021 N.	density of no less than 30 DO/AC.	throughout the City. After carefully
	Harbor		considering the public's input and the
	l larger		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.
	1	<del>,</del>	

05.20.2021	Anthony Dedousis, Director, Policy and Research, Abundant Housing LA (Letter submitted of behalf of Abundant Housing LA and YIMBY Law)

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.

Cites major concerns about the City's willingness and ability to meet its statemandate 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.

City fails to identify enough sites where RHNA housing growth can be accommodated by 2029.

City's approach fails on three counts:

- 1. The City proposes new housing in locations where it is highly unlikely to be built.
- 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.
- 3. The City bans new mixed-use development in locations where it has successfully been built in recent years.
- 1. Unlikely that the City's rezoning plan will encourage meaningful housing growth.
- 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.
- 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.

City failed to provide convincing evidence that redevelopment of above sites is likely to happen.

2. The City overlooks a large number of potential housing sites, including:

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 190th 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 density residential on the determined housing sites per the draft housing element.

As noted, none of the property owners of the proposed housing sites have

- 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.
- The former South Bay Medical Center (9.3 acres). Site should provide additional housing at 55 units per acre.
- Beachside parking lots (24 acres). Should be developed with residential, similar to Marina Del Rey.
- The Space Park and Aviation Park parking lots (62 acres). Northrop Grumman parking lots should be developed with residential.
- The Riviera Village parking lots. Should be developed with 60 or 215 units.
- The west side of the Redondo Beach Transit Center. Maximum legal density should be allowed on all parcels within a half-mile of station.
- 3. The City plans to reduce the amount of development in areas where housing "pencils out". Claims the City violates "no net loss" requirements.
- 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.
- Pacific Coast Highway. The City has banned new mixed-use development along PCH and moving housing a mile to the north.
- 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.

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.

The City should commit to major constraint removal policies in order to encourage strong housing growth at all levels of income including:

- Legalize apartments on all residentially zoned parcels including R-1.
- Significantly up zone parcels near transit, job centers, schools, and parks.

expressed opposition to the potential future development of high density residential on their properties.

Additionally, some of the subject property owners have experience with the "densification" of other properties they own/control that have existing commercial development.

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.

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.

The Housing Programs identified in the draft housing element specifically target the assessment and, if necessary, removal of governmental constraints concerning housing.

Additionally, as proposed, the housing

		<ul> <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>	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.
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.
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	Hopes planning process is protected from special commercial interests and "ill-conceived state government requirements".  Most important thing in planning is "greening up" of Redondo.	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

	I		
			and Community Development to
		Claims past city governments have catered to special developer interests, resulting	ensure the City's housing element is
		in inadequate yards/setbacks on residential lots and no space for beneficial trees	ultimately compliant with applicable
		and plants to capture carbon and water, beautify neighborhoods, provide oxygen,	State housing laws.
		and cool the atmosphere.	
			The issue of "greening up" will be
		Require ample green space, parkland, and trees with every residential building	addressed as part of the ongoing
		permit.	updates to the City's Land Use and
			Open Space and Conservation, and
		Supports a proposed development on Catalina Avenue between Diamond and	Parks and Recreation Elements of the
		Emerald Streets that preserves the café and adds a bakery. Notes that the	General Plan.
		development is also overcrowded. Suggests additional development standards	General Han.
		,	The Conoral Plan Advisory Committee
		including planting native plant species for this proposed development. Offered	The General Plan Advisory Committee
		South Bay Parkland Conservancy as a resource.	(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.
07.26.2021	Nancy Skiba,	"Affordable housing for 90277 and 90278 should be equally planned."	The General Plan Advisory Committee
	Resident		(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
			meeting on June 13, 2021 approved the

			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
			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."
			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.
08.24.2021	Natalie	"North Redondo Beach is already doing it's share to accommodate more housing.	The General Plan Advisory Committee
	Bennion,	Please zone 1,245 units in the 90277 part of town. There is availability in areas	(GPAC), Planning Commission, and City
	Resident	such as the 50-acre power plant site."	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.
08.25.2021	Leonid	Claims the City of Redondo Beach has spent the last generation fighting	Permits have been issued for the
	Pustilnikov, Property	development. Cites the Legado Project development review process in support of claim.	Legado Project.
	Owner	Originally planned for 180 units, was approved for 115 units.	Concerning the comments regarding
		Still awaiting permits more than a decade later.	the probability of residential development potential of the
		Notes surprise that Redondo completed 40% (559 of 1,397) of its required 5 <sup>th</sup>	recommended housing sites, during the
		Cycle.	6 <sup>th</sup> cycle, the following is provided:
		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:  • North Tech site.  • A business in Redondo Beach since 1985 has no intentions of relocating or shutting down.  • A grocery anchored shopping center with 100% occupancy (17 tenants) has no plans of selling or repositioning the property.  • A national plumbing fixture showroom located at site for years.  • Any residential development would pose a serious adverse health impacts on its residents.	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.
		South Transit Center site.	South Transit Center site – City staff continues to investigate this site and

- Property recently purchased in 2019 and as currently planned does not include housing.
- South Bay Galleria site.
  - Sought entitlements for 650 units and was approved for on 300 units.
  - Claims that due to "covid pandemic" significant changes to the project are likely and will take years to resolve.

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.

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.

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:

- 1-acre site at 1021 N. Harbor.
- 50-acre power plant at 1100 N. Harbor.

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.

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".

Strongly urges HCD to reject the housing element as drafted. Requests that the city obtain commitments from property owners of the designated housing sites

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 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.

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.

Staff does not anticipate that HCD will not accept any of the proposed 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.	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 neighborhoo d)	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 housing sites as identified within the draft housing element.
08.31.2021	Sheila Lamb, resident (GPAC Member)	General: Requests that new additions to housing element be identified.  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:  Section 2.2.1 Introduction (Page 1).  Section 2.2.1C Public Participation (Page 2).	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

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		Section 2.2.2D Homeless Resources (Page 22).	example, figures (bar charts) were
		Section 2.2.2E Table H22 Single family attached units (Page 24).	added to the draft housing element
		Section 2.2.3A Constraints on Housing Production-Government Constraints	which illustrate the City's unique
		(Page 34).	housing mix, with more percentage of
		• Section 2.2.3A4 Tables H35-36 Provision for a Variety of Housing Types (Pages	residential land area designated as
		41-42).	multi-family zoning rather than single-
		• Section 2.2.3A4 Provision for a Variety of Housing Types-Zoning and Land Use (Pages 46-47).	family zoning, in comparison to surrounding jurisdictions and the SCAG
		• Section 2.2.3A4 Provision for a Variety of Housing Types-Senior Housing (Page 48).	region overall.
		<ul> <li>Section 2.2.3A4 Provision for a Variety of Housing Types-Emergency Shelters,</li> </ul>	
		Transitional Housing, Supportive Housing, SRO's (Page 48).	
		Section 2.2.3B5 Liquefaction (Page 61).	
		• Section 2.2.3B Flooding (Page 61-64).	
		• Fig. H2/H3 Sites Inventory (Pages 75-76).	
		Appendix C Public Participation (Page C-1).	
		Add Appendix-List of legislation mentioned in the text.	
		Add Appendix-List of zoning amendments in the text.	
		Add Additional Numbers-More easily search the document.	
09.02.2021	Brian Clark,	Raised four (4) main concerns with the Housing Element:	The City continues to review the
	Resident	1. Housing Element does not mention the GLBTQIA+ community and requests	comment concerning the GLBTQIA+
	(Golden Hills	that the document identify and count this community and include specialized	community and whether additional
	neighborhoo	support resources that other segments of the population have been given.	considerations are necessary to include
	d)	2. Commenter does not support the placement of the majority of housing in	in the draft housing element.
		North Redondo and most specifically the housing adjacent to the 405 freeway	
		(North Tech District). Cites health and well-being concerns for persons having	Any future redevelopment of high
		to live next to the 405 freeway.	density residential within the North
		3. Commenter concerned with over-densifying the Northern-most corner of the	Tech District will be subject to the
		City, citing that it will be too impactful a change in one area. Prefers that	requirements of the California
		development be more evenly spread throughout the City on smaller parcels.	Environmental Quality Act (CEQA) to
		Comments on inequity of plan to locate high density in one area and leave	address potential environmental
		other others unchanged.	impacts of a future project.
			Additionally, the current General Plan
			update will include an environmental

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.

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.

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.

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

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			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	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

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

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 will be applied.

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.

09.03.2021	Alisa Beeli, Resident	<ul> <li>Strongly urges the City to reject the Housing Element plan and cites the following in support:</li> <li>Nearly 94% of required units in the North/90278 zip code</li> <li>Places nearly all new zones 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>	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.
		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.  Concerned that hundreds of public comments were ignored and housing should be better distributed throughout the entire City.	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.  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
			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.
			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.
09.03.2021	Mariam P.	Requests that housing/low income housing be evenly distributed throughout the	The City's existing residential density in
	Butler,	City to minimize impacts to one district. D4 is already very dense and cannot	the southern part of the City is the
	Resident		densest. Proposed "housing sites" for

accept the majority of housing. Impacts on schools and resources need to be potential future high density residential were not necessarily based on existing considered. 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. 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. 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 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.
09.03.2021	Tieira	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.  Comments that not providing affordable housing has negative impacts. Notes that LA County residents have been requesting more affordable housing for 10 years.  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.	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.
			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.
			Recent changes in State housing laws,
			Senate Bill (SB) 9, allow for the
			subdivision of R-1/small lots.
09.03.2021	Marianne	Comments on the thoroughness and significant research went into the document.	Due to the length of time that it took
	Teola,	Expressed disappointment with short notice for providing comments, received	the State (HCD) and the Southern
	Resident	email day before comments due. Suggests that a summary of the main points of	California Association of Governments
		the Housing Element be attached to the element. Asks the question, how will the	(SCAGs) (and its member jurisdictions
		City be impacted by the recommendations in the element?	including the City of Redondo Beach) to
			complete the 6 <sup>th</sup> Cycle Regional
		Comments on the difference between a single-family residence in District 1 vs.	Housing Needs Allocation (RHNA)
		District 3. Questions the allowance of "third floors" in single family residences.	process, inclusive of the appeal
		Requests that a zoom meeting with the average citizen be scheduled to discuss the	process, coupled with the State's 60
		plan. Asks questions about the Beach Cities Health District.	day review period and deadline for
			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.
			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.
			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.
			Any concerns with zoning development standards, "third floors" can be 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.	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.
			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.
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 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	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.  Commenter presents disproportionate statistics concerning COVID and cites overcrowding in Black and Latino neighborhoods as reasons for higher infection/death rates.  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.	<ul> <li>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:</li> <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>

Cites that LA County is only expected to build 7% of required housing by 2030 and shortfall will impact Black and Latino families disproportionately.

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.

Commenter doesn't believe the draft housing element provides equity and affordability and wishes to meet to discuss the following:

#### **Protections**

- Expand just-cause eviction protections.
- Implement local RSO or strengthen/reduce the annual allowable rent increases.
- Codify tenant's right to council for evictions.
- Strengthen tenant education programs.
- Create tenant anti-harassment ordinance.

### **Preservation**

- Prioritize rezoning in high-resource neighborhoods which are transit- and jobrich, including single-family zones.
- Exclude parcels containing RSO housing units in site inventory.
- No net loss provisions should apply to site inventory parcels and include rezoning program with monitoring/implementation.
- Institute local program and funding sources for preservation of existing affordable housing.

### Prioritization of affordable housing

- Include inclusionary zoning to locally fund/incentivize affordable housing.
- Prioritize creation of affordable housing on public land.
- Streamline affordable housing production.
- Include programs for 100% affordable housing zoning overlays and apply to high-opportunity and R1 areas.

### Site Capacity Assessment

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.

City staff and the City's housing consultant plan to initiate meeting(s) to confirm with the Our Future LA Steering Committee Members (commenter).

Protections: 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.
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

- Report the realistic capacity vs. estimated realistic capacity for both vacant and nonvacant sites.
- Commenter estimates draft housing element will fall short of RHNA by 2,575 units of realistic capacity.
- 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.
- Survey owners of nonvacant housing sites to determine likelihood of being discontinued during the planning period.
- A buffer of 15-30% capacity should be included in sites inventory.
- Provide quantitative estimate of in-pipeline projects likely to be completed based on historical data and adjust accordingly.
- Commit to mid-cycle review.

#### Affirmatively Furthering Fair Housing

- Increase the concentration of lower-income households in areas where concentrations are low.
- Reduce the concentration of lower-income households in areas with significant exposure to noise/pollution.
- 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.
- Analyze local patterns in socioeconomic/racial segregation and integration.
- Prioritize high-opportunity census tracts and well-resourced areas when selecting sites for lower-income housing.
- Identify funding sources/public resources/density bonus programs to maximize likelihood of below market rate units are built.
- Solicit public feedback/commentary on housing element reflecting City's socioeconomic makeup.
- Utilize HCD recommended safe harbor methodology for forecasting future ADU development.

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.

Preservation: 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.

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 organization. Concerning "Prioritization" the City is currently investigating the development of a Citywide inclusionary housing ordinance. Concerning "Site Capacity Assessment" the City is conducting surveys with the property owners of the recommended housing sites. Concerning "Affirmative Furthering Fair Housing" since all of the City's neighborhoods are qualified as "high

		<ul> <li>Provide mid-cycle adjustments in inventory sites/ADU development is less than projected. Mid-cycle adjustments should automatically implement byright 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>	resource", all future affordable housing will benefit within Redondo Beach.
09.15.2021	Abundant Housing LA/YIMBY Law	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.	The City also supports more housing at all levels of affordability as described and programed in the draft housing element.
		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.	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
		Commenter cites HCD's September 2, 2021 letter identifying, "revisions will be necessary to comply with State Housing Element Law".	small lot site on Pacific Coast Hwy. City staff continues to investigate these housing sites and has engaged property
		<ul> <li>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:         <ul> <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> </ul> </li> </ul>	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
		<ul> <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> </ul>	opposed to the Residential Overlay designation on their properties. Staff is continuing to investigate these sites.

- Create 100% affordable housing zoning overlay for high-opportunity neighborhoods including R-1.
- Provide quantitative estimate of site's realistic capacity. Commenter references "Survey Method" or "Historical Redevelopment Rate Method".
- Report sites developed during prior planning period.
- Share interest letters with planned development descriptions from owners of site inventory parcels.
- If City lacks enough suitable sites to achieve RHNA, don't add more theoretical units to existing sites, rezone additional parcels.
- Commit to mid-cycle review to verify assumptions and adjust if necessary.
- Provide quantitative estimate of "in-pipeline projects" and adjust if necessary.
- Create local density bonus program that also applies to low-density parcels.
- Pre-approve standard ADU's, small-scale multifamily and small lot subdivision housing plans.
- Expand and speed up ministerial review process.
- Eliminate on-site parking requirements.
- Reduce restrictions on development standards.
- Reduce fees on multi-family residential development.
- Survey/poll online and hardcopy formats in top languages spoken in community regarding preferences/priorities for zoning and residential development.

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.

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 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).

The following is a list of additionally proposed "programs" within the draft housing element that address and are consistent with the intentions of many

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			of the policy recommendations from
			the commenter:
			Program 1: Mobility Access/Emergency
			Repair Program;
			Program 2: Preservation of Affordable
			Housing;
			Program 3: Inclusionary Housing;
			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.
09.15.2021	Wally Marks,	Commenter supports the Housing Element document identifying ways in which the	As noted by the commenter, the City's
	Property	housing needs of existing and future populations can be met and its focus on	draft housing element promotes and
	owner: 2810-	improving affordable housing, finding more affordable housing and removing	furthers the identification of ways in
	2860 Artesia	constraints.	which the housing needs of existing
	Boulevard		and future populations can be met and
		Comments on need for updating zoning and adopting an inclusionary housing	focuses on improving affordable
		ordinance.	housing, finding more affordable
			housing, and removing constraints.
		Comments on restrictions from past and current being prohibitive of housing	, , , , , , , , , , , , , , , , , , , ,
		development and recommends incentive based policies to create opportunities for	The City is currently investigating the
		more affordable units throughout Redondo Beach.	development of an "inclusionary
			housing" ordinance that could serve to
			further the City's intentions to build
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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.	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.  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.
09.17.2021	Mary Schurr, Resident	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.	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public
		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.	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
		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.	and the hundreds of comments/requests received, the City Council at their public meeting on June
		Cites City's solution is to place housing on fringes of City. All housing sites are adjacent to other "less affluent jurisdictions".	15, 2021 approved the housing sites as identified within the draft housing element.
		Cites list of reasons why many of the identified housing sites are not likely to be developed:	

#### North Tech Site

- Existing development not likely to shut down/relocate.
- If any residential is developed they will have a 45-minute commute to Redondo Union High School.
- Would not be near any amenities.

#### **South Transit Site**

- Cites property owner is working on a project that does not include residential. South Bay Galleria
- Should have more residential. There is an EIR for 650 units.

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.

Don't allow zoning on unlikely properties while ignoring large parcels next to the beach/bike paths/parks.

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.

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.

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 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.
			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.
			Staff does not anticipate that HCD will not accept any of the proposed housing sites.
09.22.2021	Robert Doran, Director of	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.	North Tech site – The property owner of the largest shopping center in the North Tech District has expressed

Development		enthusiastic support for the allowance
&	"ROIC would welcome the opportunity to introduce High Density Residential to our	of high density residential on their
Construction,	Redondo Beach Plaza. I have attached some examples of other properties we own	property while maintaining their
Redondo	where we have recently completed or are in the process of entitling/permitting	existing commercial center.
Beach Plaza	densification efforts which includes residential components."	Additionally, the property owner has
(North Tech		recent experience with introducing
District –		high density residential within existing
Housing Site)		older shopping centers that retain
		existing commercial and are located in
		close proximity to freeways.

#### **BLUE FOLDER ITEM**

Blue folder items are additional back up material to administrative reports and/or public comments received after the printing and distribution of the agenda packet for receive and file.

### October 5, 2021

L.1. PUBLIC HEARING FOR CONSIDERATION OF THE CITY OF REDONDO BEACH 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND CERTIFICATION OF AN INITIAL STUDY/NEGATIVE DECLARATION

ADOPT BY TITLE ONLY RESOLUTION NO. CC-2110-095, A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDONDO BEACH, CALIFORNIA, ADOPTING THE CITY'S 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND ASSOCIATED CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION, INITIAL STUDY/NEGATIVE DECLARATION

CONTACT: BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR

PowerPoint Presentation



6<sup>TH</sup> CYCLE 2021-2029
DRAFT HOUSING ELEMENT

City Council October 5, 2021

Public Hearing Item L.1.

# 2013-2021 Housing Element

- Current 5<sup>th</sup> Cycle 2013-2021 Housing Element adopted March 18, 2014, <u>after the statutory deadline</u>
  - City is currently subject to two four-year updates of the HE before becoming eligible for an eight-year update cycle
  - The 2017 Technical Midterm Update to the HE was required to be adopted by October 15, 2017 (no grace period available for four-year updates)
- City adopted it 2017 Midterm Housing Element on time –
   September 19, 2017
- Eligible to return to an eight-year update cycle by 2021-2029 HE if 2021 update is adopted on or before October 15, 2021

# Recent Steps

- 2017 2020 GPAC Meetings
  - 22 GPAC meetings to date, focus on housing (where and what densities)
  - GPAC Meeting 22 (December 3, 2020) focused primarily on housing sites for RHNA and SB 330 No Net Loss compliance
- November 17, 2018 Community Workshop
- January 12, and September 21, 2021 City Council Inclusionary Housing Meetings
- April 7, 2021 Community Workshop
- April 7 April 11, 2021 Social PinPoint Land Use Plan Survey
  - 349 comments received
- April 15, 2021 Planning Commission Public Meeting
  - Planning Commission provided recommendations for additional Residential Overlay sites to City Council for consideration
- April 20, May 4, May 11, May 18, and June 15, 2021 City Council Meetings
  - The City Council considered the Housing Element, RHNA, and adequate sites requirements over multiple meetings

### 6<sup>th</sup> Cycle 2021-2029 Housing Element

- One of the seven mandated elements of the General Plan
- Contents:
  - "Introduction"
    - Community Context Role of Housing Element Public Participation
  - "Housing Needs and Resources"
    - Provides an assessment of both current and future housing needs
    - Current Demographics (2020 Census) Population, Households, Special Needs Groups, Housing Stock
  - "Constraints on Housing Production"
    - Identifies constraints Governmental and Non-Governmental
  - "Housing Resources"
    - Identifies "housing sites" that can accommodate City's RHNA
    - Not an obligation to construct
  - "Housing Plan"
    - Provides a comprehensive strategy that establishes goals, policies, and "programs"
    - Programs must include timelines and specific actions to implement
- Must be reviewed by the State Department of Housing and Community Development (HCD) for compliance with State laws

## Public Comments and Responses

#### 34 Public Comment Letters/Emails Received

 31 provided with City Council Package – 3 provided as Blue Folder items (Have not been responded too)

#### 4 comments on ISND

- Caltrans, General Public
- 2 included in Final ISND
- 2 provided as Blue Folder items (Have not been responded too)

### Staff Responses to Comments Table (Blue Folder)

Table summary of all comments received with responses

#### Next steps

- Staff will provide replies to commenters
- Fall 2021: Commenters will be invited to comment on revised 6<sup>th</sup> Cycle 2021-2029 Housing Element

## Public Comments and Responses

### 2 comments on ISND (After the advertised comment period)

#### Comment Summary:

- The negative declaration relies on two inaccurate/flawed conclusions:
- 1. The Housing Element is only a policy document and therefor does not require CEQA analysis.
- 2. The Housing Element does not create changes that result in impacts and any analysis would be accomplished with future specific projects.
- Commenter agrees that analysis should occur with land plan changes as part of General Plan Update however is concerned with the City again deferring the CEQA analysis to future projects using same arguments.

#### Reply Summary:

- City agrees the Housing Element is is a policy document, however it does require a CEQA analysis, as a result an Initial Study was conducted.
- The recommended changes in land use within the HE will be analyzed at the time the actual changes are processed with the land use element update – Environmental Impact Report required.

HE Topic	HCD Comments	Response to Comments
Affirmatively Furthering Fair Housing (AFFH)	Provide additional local knowledge supporting conclusions.	Added additional information describing local historical zoning and housing development trends that better informs the issue area.
AFFH Sites Inventory	Expand Sites inventory analysis to address how AFFH obligations are improved or exacerbated.	Additional information concerning planned inclusionary housing ordinance, to address access and opportunity and concentrations of affluence has been added.
Adequate Sites – Electronic Sites Inventory	City must submit an electronic version of the adopted sites inventory.	The City will submit an electronic version of the sites inventory with its adopted housing element to HCD.

HE Topic	HCD Comments	Response to Comments
Adequate Sites – North Tech District	Expand analysis in order to justify suitability of this nonvacant site.	Additional descriptions of envisioned planning standards to maintain existing uses and allow new residential have be incorporated into the element. Additionally, the City received support for future housing at Redondo Beach Plaza (Plans for similar projects were Blue Foldered)
Adequate Sites – Small Sites (S PCH Mixed Use and 190 <sup>th</sup> Street Industrial Flex/ Residential Overlay)	Expand analysis to establish conditions on sites are suitable for consolidation and development within the planning period.	These are contiguous and suitable for lot consolidation, and surrounded by residential development. The City has engaged existing property owners to gauge support/interest for future high density residential and is providing more details to support likeliness for redevelopment as residential.

HE Topic	HCD Comments	Response to Comments
Housing Programs – Adequate Sites	As drafted element does not identify adequate housing sites to accommodate RHNA. Add program to identify additional	Added (and adding) discussions and additional information necessary to demonstrate the currently proposed sites are adequate to accommodate the City's capacity for 1,415 units for lower-income households.  Expanded Program 8 (Adequate Sites for
Housing Programs* – Program 2 (Preservation of Affordable Housing)	sites.  Revise Program 2 (Preservation of Affordable Housing) to include actions specific to Seasons Senior	RHNA) to incorporate statutory requirements Program has been amended to include specific actions by the City to proactively engage the property owner and property manager of the Seasons Senior Apartments to provide education and ensure their understanding of their obligations under preservation law.
	Apartments.	

<sup>\*</sup> Housing Programs are in numerical order not in order of HCD September 2, 2021 letter.

HE Topic	HCD Comments	Response to Comments
Housing Programs – Program 12 (Accessory Dwelling Units)	Expand program to include additional specific actions to support the development of ADUs.	Staff has investigated additional strategies consistent with HCD's suggested additional incentives and has included them in the revised element.  Expanded Program 12 (Accessory Dwelling Units) to include commitment to develop tools and incentives.
Housing Programs – Program 13 (Amendments to the Zoning Ordinance)	This program should be revised to amend the parking standards for all multifamily development, not just for a subset of smaller units.	The City will be assessing parking and other development policies as they relate to the City's continued work plan for the General Plan update and planned parking standards consistent with HCD's requirements will be integrated into this program.

HE Topic	HCD Comments	Response to Comments
Housing Programs – Program 14 (Objective	Revise program, to explicitly commit to establishing	Program expanded to include ODS for the Residential Overlay Districts.  The City is assessing the continued work plan
Design Standards)	objective design standards for the four (4) residential overlay districts by a specific date.	for the General Plan update and as part of this effort a firm date for the development of Objective Design Standards can be determined and integrated into this program.
Housing Programs – Program 15 (Monitoring Effect of Measure DD)	Revise program to identify the relationship between the approval of the electorate and continued housing element compliance.	The element has be amended to include language acknowledging that the City must take additional action to retain housing element compliance if the electorate rejects the ballot measure.

HE Topic	HCD Comments	Response to Comments
Housing Programs – Program 15 (Fair Housing Program)	Revise program to ensure all contributing factors have associated actions, actions promote mobility and access to opportunity, and language commits to follow-up actions.	Program amended with additional specific actions to address contributing factors, promote mobility and access to housing, and strengthen language to commit to follow up actions.

HE Topic	HCD Comments	Response to Comments
Public Participation	The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD.	Staff plans to engage property owners, element commenters, the housing development community, and the public after revisions are made to the element per HCD's comments.

# Next Steps

#### October 5, 2021

 City Council Public Hearing to Consider Adoption of the 6<sup>th</sup> Cycle 2021-2029 Draft Housing Element

#### October 15, 2021

- Pursuant to State law, Housing Element Update is required to be adopted (no grace period available for four-year updates)
- With adoption by the City of the Housing Element on or before this date, City will be on an 8 year cycle going forward

#### Fall 2021

- Continue to revise adopted Housing Element as required by HCD
- Engage property owners, element commenters, the housing development community, and the public after revisions are made to the element per HCD's comments

#### Late 2021-Early 2022

- Public Hearings before the Planning Commission and City Council for review and adoption revised 6<sup>th</sup> Cycle 2021-2029 Housing Element
- Resubmit revised 6<sup>th</sup> Cycle 2021-2029 Housing Element for certification by HCD

### Environmental

#### The City proposes to adopt a Negative Declaration for the 6th Cycle 2021-2029 Draft Housing Element

- Housing Element is a policy document (subject to CEQA), however the land use designations and zoning amendments recommended in the Housing Element are **not** under consideration at this time.
  - The amendments to the General Plan land use designations will be processed as part of the ongoing General Plan update – REQUIRES AND ENVIRONMENTAL IMPACT REPORT (EIR)
- The City nevertheless conducted an Initial Study consistent with CEQA and determined that no environmental impacts are anticipated and a Negative Declaration is proposed.
- The Initial Study/Negative Declaration (ISND) for the Draft Housing Element was advertised beginning on August 5, 2021 and ending on September 3, 2021.
  - Two (2) comment letters were received on the proposed ISND during the comment period and they are included as an appendix to the ISND along with the City's responses to said comments
  - Two (2) additional comments provided under Blue Folder.

### Recommendation

#### That the City Council:

- Receive and file all documents and correspondence on the 6<sup>th</sup> Cycle 2021-2029 Draft Housing Element;
- Accept all public testimony; and
- Close the public hearing, review, discuss, reach consensus on any recommended edits, and ADOPT RESOLUTION NO. CC-2110-095 BY TITLE ONLY, and waiving further reading of:
- A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDONDO BEACH, CALIFORNIA, ADOPTING THE CITY'S 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND ASSOCIATED CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION, INITIAL STUDY/NEGATIVE DECLARATION