

# City of Redondo Beach 2021-2029 Housing Element

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Community Development Department  
415 Diamond Street  
Redondo Beach, CA 90277

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## 2.2 HOUSING ELEMENT

### EXECUTIVE SUMMARY

Redondo Beach has long embraced its responsibility to provide for a broad range of housing types and densities. The City has previously taken action to zone for residential development at much higher densities than what the City was originally intended/designed to accommodate. Redondo Beach is a perfect example of a medium-sized coastal city striving to meet and address the housing needs of Southern California. Redondo Beach has every level and type of housing; singles, 1 bedroom, 2 bedrooms, 3 bedrooms, including multi-family housing and single-family housing, as well as affordable housing and multi-million dollar coastal homes. Fifty-percent of the housing units in the community are rentals. The City also has its own Housing Authority with over 500 vouchers issued for Section 8 housing. There are numerous affordable senior living complexes throughout town, as well as assisted living and group facilities. Redondo Beach is also a leader in helping house people experiencing homelessness. The City has invested in a number of local initiatives including the construction of its own pallet shelter facilities, partnering with multiple homeless support providers such as mental health experts, and the hiring of a full time housing navigator counselor dedicated to assisting the homeless. Redondo Beach also partnered with a developer and the County of Los Angeles to create 20 permanent supportive housing units on Pacific Coast Highway with State Project Homekey grant funds. The units have been sited in the southern area of the City near many of the private and public services for those experiencing homelessness.

Historically the City was predominately a single-family suburban residential community with commercial corridors to support the service and retail needs of surrounding neighborhoods. This is evidenced in the lot size and land use patterns of the City's zoning map. In review of the City's zoning map there are numerous examples of lot sizes and lot patterns that appear identical; however, the zoning of these seemingly identical subdivisions is now a mix of R-1 (Single Family Residential) and R-2/R-3 (Multiple Family Residential).

Like many communities in California, Redondo Beach is largely 'built-out' with worsening traffic, inadequate parking, schools at capacity, and water shortages. However, Redondo Beach's population continues to grow, along with average household size and the number of households. The City has been averaging an additional 60 units per year for the last 15 years.

Redondo Beach's population density is 11,000 residents per square mile. The City is one of the most densely populated areas in California. Demographia.com rated Redondo Beach as 43rd in population density for U.S. Cities over 50,000 people after the 2000 census. With this population density, the City as a result has 11 Level of Service 'F' intersections and similar parking challenges. Nonetheless, the City of Redondo Beach is producing a wide variety of housing after carefully considering the suitability and impacts of each housing project.

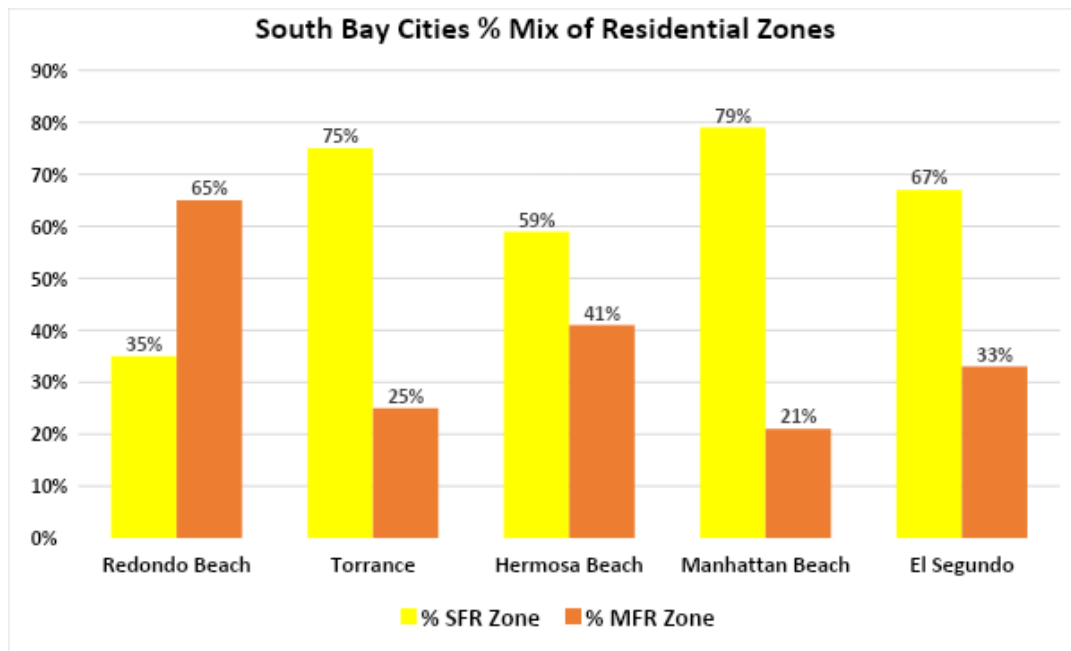
Over prior decades Redondo Beach has converted/up-zoned a majority of its originally planned Single Family residential neighborhoods into Multiple Family zoned and developed neighborhoods. This is unique in the South Bay Cities Council of Governments (SBCCOG) subregion. Many of the surrounding jurisdictions within the SBCCOG subregion have taken

a different approach, as evidenced by their current zoning maps that largely preserve much of their Single Family Residential zones/neighborhoods, resulting in a much smaller percentage of their residentially zoned properties having Multiple Family designations and densities.

Below is a table which illustrates the City of Redondo Beach’s balanced approach, via zoning, to the development of diverse housing types over recent decades. Redondo Beach’s current mix of residentially zoned neighborhoods is 65% Multiple Family designations and only 35% Single Family residential.

<b>Redondo Beach Mix of Residential Zoning: 65% Multi-family Density – 35% Single-family Density</b>			
<u>Zone</u>	<u>Density</u>	<u>Area (Acres)</u>	<u>Percent</u>
<u>R-1 (Single Family)</u>	<u>8 DU/AC</u>	<u>752.87</u>	<u>35%</u>
<u>R-1A (Small Lot Single Family Zoning with a Multiple Family Density)</u>	<u>16 DU/AC</u>	<u>121.69</u>	<u>6%</u>
<u>R-2 (Multiple Family)</u>	<u>15 DU/AC</u>	<u>472.00</u>	<u>22%</u>
<u>R-3, RMD, RH1-3, R-MHP (Multiple Family)</u>	<u>Up to 28 DU/AC</u>	<u>702.08</u>	<u>33%</u>
<u>MU-1-3, CR (Mixed Use)</u>	<u>Up to 35 DU/AC</u>	<u>101.50</u>	<u>5%</u>
<b><u>Total</u></b>	<b>-</b>	<b><u>2,150</u></b>	<b><u>100%</u></b>

Below is a chart with comparative percentages of Single Family zones versus Multiple Family zones/densities for Redondo Beach, Torrance, Hermosa Beach, Manhattan Beach, and El Segundo (South Bay Cities), which clearly demonstrates the City of Redondo Beach’s responsible approach to meeting existing housing needs over recent decades.



\*SFR includes R-1

\*\*MFR includes the R-1A zones, in addition to all Multiple Family and Mixed Use zones, where R-1A zones have small lots (previous R-1 lots that were split in half) with densities comparable to Multiple Family zones.

The above percentages do not consider the enactment of Senate Bill 9 on January 1, 2022, whereby all single-family lots can be split into two parcels and two units can be constructed on each new parcel if requested by the homeowner. Allowing four units on single-family lots increases density in these areas from 8.8 units per acre to approximately 35 units per acre for a typical single-family lot in Redondo Beach.

### **Recent Housing Projects in Redondo Beach That Address Housing Shortage**

As can be seen in the Housing Element describing “Progress Toward RHNA: Entitled/Approved/Under Review Projects”, there are several mixed use and residential projects underway that will contribute toward the 6<sup>th</sup> Cycle RHNA obligation in Redondo Beach. As well, there are other housing developments that have just been completed in the City in recent years. This housing is distributed throughout the community, including the affordable units.

- Kensington (approved by the voters in a City Charter Article XXVII required vote):
  - Located in south Redondo Beach
  - Former school/community center/playground site
  - Completed August 2019
  - 98-unit 130-bed residential care for the elderly with memory care facility
- One South:
  - Located in south Redondo Beach
  - Former commercial site
  - Completed January 2019
  - 52-units mixed use project
- 219 Avenue I:
  - Located in south Redondo Beach
  - Completed September 2020
  - 12-unit mixed use project (2 of units are affordable)
- Legado:
  - Located in south Redondo Beach
  - Former commercial site
  - Construction expected to start mid-2022
  - 115-unit mixed use project
- Alcast Foundry:
  - Located in north Redondo Beach
  - Former industrial site
  - Construction expected to start mid-2022
  - 36-unit residential project
- South Bay Galleria:
  - Located in north Redondo Beach
  - Former commercial site
  - Construction expected to start in 2023

- 300-unit development as part of larger mixed use project (at least 30 of units will be affordable)
- Catalina Village:
  - Located in south Redondo Beach
  - Current commercial uses
  - Approvals being considered in 2022
  - 30-unit mixed use project (4 of units will be affordable)
- The Moonstone - Project Homekey:
  - Located in south Redondo Beach
  - Current hotel use
  - Application for funding being considered in early 2022, with renovations expected in 2022
  - 20-unit permanent supportive housing (all 20 units will be affordable affordable) as conversion of hotel to housing for those experiencing homelessness or at risk of becoming homeless

### **Accessory Dwelling Units**

The City adopted local ordinances in 2021 specifying streamlining options. Since the State passed new ADU provisions, the City has seen a steady increase in ADU activities from 17 units in 2017 to 24 ADUs in 2021 even during the pandemic. The City is currently in the process of preparing Objective Residential Design Standards that will clarify with drawings and descriptions ADUs that can be readily constructed through the streamlining process.

### **Limited Sites Inventory**

Redondo Beach has a limited number of sites that meet the criteria of the California Department of Housing and Community Development (HCD) for a minimum of ½ acre or greater. The ½ acre minimum criteria artificially suppresses Redondo Beach’s proven capacity for affordable housing, as demonstrated by the City’s historical development. As noted above, the 219 Avenue I, Catalina Village, and The Moonstone are all providing or proposing to provide affordable housing on sites that fall below the ½ acre threshold. To focus on finding sites that meet that criteria, which are also viable for residential development to occur within the 8-year planning cycle of the Housing Element, the City focused on properties that have the prerequisite acreage, the current site is unused or underutilized, and where a robust mixed use project is realistic based on the interest of the owner(s). The City has also been careful to account for locations where the population density increases over the past several decades have resulted in Level of Service 'F' intersections and similar parking challenges. As such, many of the proposed housing sites have been purposefully identified in locations that have easy access to public transit centers and freeway entrances. Thus, the sites inventory has included numerous sites in the vicinity of transit and freeways.

There has been discussion and public comments regarding the site where the AES power plant is currently located and operational. This site is not considered a realistic candidate for meaningful housing during the 6<sup>th</sup> Cycle and has not been proposed for housing because:



- There have been four (4) City-wide public votes beginning in 2005 supporting parkland for future use of the site and two (2) prior public referendums that halted proposed redevelopment of the AES site for residential purposes.
- State Water Board and Energy Commission actions continuing to mandate that the plant operate due to limited power grid resources.
- There is a designation of active wetlands on the site.
- Redondo Beach has extremely limited park access/space and has identified the site as being critical to addressing the City's parkland shortfall.
- The transportation infrastructure that serves the site is overburdened.

The AES site cannot be relied upon as a housing site in the 6<sup>th</sup> Cycle Housing Element due to the continuing mandated extension of the use of the power plant due to climate change and inadequate power supply in California, as stated by the California Independent System Operator in recent hearings before the California State Water Resources Control Board. This will be exacerbated as the Diablo Canyon Nuclear Plant is removed from service.

When the AES power plant is finally mandated to cease operations, the California Coastal Commission has established that there are 5.9 acres of active wetlands on the site that must be restored in any redevelopment of the site. In addition to the wetlands, a required buffer from the adjacent land use is likely. The Audubon Society has been conducting bird species surveys of the wetlands on the AES site since the wetland determination was made. To date, over 130 species of birds have been catalogued at the AES site wetlands area, many of them wintering at the site along the Pacific Flyway. With over 90% of the Los Angeles County historical wetlands having been developed, every wetland in southern CA is critical habitat.

Open space and conservation at the AES site is not just critical to wildlife. Redondo Beach is considered "park poor" by State definitions. The State has established a minimum standard need of 3 acres of parkland per 1000 residents as reflected in and authorized by the California Quimby Act. The County of Los Angeles, in the recent study entitled "Los Angeles Countywide Comprehensive Park and Recreation Needs Assessment" published in 2016 determined that Redondo Beach had only 1.4 acres of parkland per 1,000 residents, making it one of the most "park poor" communities in Los Angeles County. This is far below neighboring cities with over 5 acres of parkland per 1,000 residents. Redondo Beach has established 3 acres of parkland per 1,000 residents as its standard, with 5 acres per 1,000 residents as a goal. Yet the City's existing ratio falls well below that. Because the City was subdivided and a significant portion of it built before its parkland standards were established, it has been an ongoing challenge for the City to identify, acquire, and construct new open space to meet its target of even the minimum 3 acres per 1,000 residents. Currently, the City would need to add approximately 50 more acres of park facilities to achieve 3 acres per 1,000 residents given the existing population. Available parcels are scarce, expensive, and small, making it difficult to significantly increase the City's existing ratio. As the City continues to see new accessory dwelling units and other housing projects, the number of required acres will increase proportionally with the population. This site could accommodate some if not all of the City's shortfall in parkland.



Redondo residents have recognized the value of the AES site as potential parkland for years. The Redondo Beach community has repeatedly shown their commitment to converting what is now known as the AES site to a large park to address Redondo Beach’s park needs, and most recently the City’s park shortage. Here are examples of efforts over decades that demonstrate the community’s intent:

- In 1933 the City produced a plan to convert the site to a recreation area focused on the former Old Salt Lake (California State Landmark No. 373) on the site.
- When housing demand grew dramatically after WWII, those plans were abandoned, the wetlands were filled, and the current power plant was constructed on the site.
- More recently, in 2002, the City of Redondo Beach introduced zoning that would allow 2,998 housing units in the harbor area, largely on the current power plant property. Residents initiated a referendum vote on this City action. In response to the referendum, the City rescinded the zoning effort.
- In 2003, there was an effort to consider the site as a redevelopment area, yet the residents again initiated a referendum vote on the action. The City ultimately rescinded that redevelopment effort. The City then commissioned a public land use alternatives process to define potential reuse of the site. The two resulting visions for the AES site were 1) a park and 2) mixed use with 350 residential units. These visions were put to an advisory vote of the people in 2005. The park vision received more votes than mixed use. The City initially did not act on this advisory vote.
- In 2008, the residents approved an initiative that would require that any major changes in land use be put to a vote of the people.
- In 2010, the City put a zoning change in the harbor area to a vote of the people. The proposed change added parkland as the only “permitted” use on the power plant property. The vote, Measure G, was approved by the voters.
- In 2015, AES qualified an initiative for a zoning change for their site to include residential zoning for 650 units. The residents rejected the initiative.

The voter rejection of housing on the AES site was not a universal objection to housing everywhere. In addition to the consideration of the site for future parkland, a major concern for residential development of the AES site is that it would exacerbate overcrowded arterials throughout the City. Nearly 93% of working Redondo Beach residents commute outside the City to work. The AES site is at least a 20 minute drive from any light rail stop and from freeway access points. Bus transit in the vicinity is more local-serving.

To address traffic and greenhouse gas emissions issues, the City is focusing on multiple large sites near transit and access to the freeway with residential overlays. As well, the City has included sites along 190<sup>th</sup> Street that are currently utilized as industrial. These sites are

surrounded by residential, lend themselves to multifamily residential redevelopment and are also closer to transportation infrastructure. There are also sites of slightly smaller sizes along Pacific Coast Highway in Redondo Beach that have become vacant or are underutilized in their current use. These are being considered for residential overlays, as well. The residential overlay will allow either the underlying use, the residential use at a gross calculation of density, or both as a mixed use site. Descriptions of those sites are provided in more detail under Section 2.2.4

#### Housing Affordability and Accessibility

- The City has initiated preparation of an Inclusionary Housing Ordinance.
- The City has and continues to approve and develop Affordable Housing Units. As noted above, there are a number projects either currently under review, approved, or recently developed that include affordable housing units.
  - 219 Avenue I (2 affordable units)
  - Catalina Village (4 affordable units)
  - South Bay Galleria (60 affordable units)
  - The Moonstone - Project Homekey (20 affordable units)
- The City has created Interim Housing to Address Homelessness - Pallet Shelters (see description below under “Addressing Homelessness”)
- The City has a history developing Assisted Living facilities. The City of Redondo Beach has an inventory of 156 assisted living units (total number of residents of 250), with up to an additional 150 units being considered by Beach Cities Health District, which would bring the total number to 400 assisted living units. Assisted living is permanent housing for most who live in this type of facility, offering the ability to remain in the community yet access the services associated with assisted living. Although these units may not fall under the low or very low income categories, they do provide access to a special type of housing that provides additional services to those in need.
- Senior Housing. There are a number of senior housing developments in Redondo Beach—from affordable to market rate. These are documented in the Housing Element.
- Group Homes and Special Needs Groups. Persons and households with special needs include seniors, persons with disabilities (including persons with developmental disabilities), large households, single-parent households, persons living in poverty, farmworkers and the homeless. These groups may have more difficulty finding affordable housing, and typically are the groups most in need of assistance. Table H-21 in the Housing Element lists the various resources available in Redondo Beach for these special needs groups.

#### Fair Housing Program

The City of Redondo Beach is committed to promoting fair housing to the community. The Redondo Beach Housing Authority’s mission statement is, “To enrich and improve the quality of life in Redondo Beach by providing excellent programs, opportunities, services, and facilities that meet the needs of the community.”

All renters and home seekers are entitled to receive equal treatment, regardless of the following: race, color, religion, national origin, sex, marital status, familial status, or age. The City contracts with the Housing Rights Center (HRC) (formerly known as the Westside Fair Housing Council), a nonprofit organization that helps educate the public about fair housing laws and to investigate reported cases of housing discrimination. The HRC is a long-established organization, dedicated to promoting fair housing for all. The City offers the following programs:

- Dispute resolution services related to Landlord/Tenant issues in Redondo Beach. Free of charge.
- Fair housing workshops and informational brochures, in addition to HRC services.
- Section 8 housing and Housing Choice voucher assistance.
- Homelessness services (see “Addressing Homelessness” below).
- Los Angeles Air Force Base Housing Program coordination.
- Resources index for connecting people with the assistance needed.

Affirmatively Furthering Fair Housing is addressed in the Housing Element in Appendix D.

### **Addressing Homelessness**

In 2012, the Redondo Beach Police Department conducted a comprehensive survey of its homeless population. The goal of the survey was to increase the City’s knowledge of this diverse population. The survey spotlighted an even greater population of persons experiencing homelessness, with more complex needs than what was previously believed.

In 2014, the City Manager formed a Homeless Task Force comprised of residents of Redondo Beach. The mission of the task force was to find collaborative ways to respond to the challenges faced by those experiencing homelessness, as well as residents, neighborhoods, businesses, schools, nonprofits, churches, and safety agencies. Under the direction of the City Manager, the Task Force made several recommendations, a key component of which was the need to contract with a coordinated outreach provider to ensure that all available services were accessible to those experiencing or at risk of homelessness.

PATH (People Assisting the Homeless) was identified as the City’s provider due to their extensive industry network, trained staff, and proven methodology for working with public agencies to address homelessness issues. PATH had previously been selected by the South Bay Cities Council of Governments (SBCCOG) to work with all SBCCOG member cities on homelessness. PATH brings over 30 years of experience to end homelessness for individuals, families, and communities.

Similar to municipalities through the State, the City’s homeless population has steadily increased each year, with a corresponding increase in associated calls for Police and Fire Department services. The increase is partially related to the recent spate of prison release policies at the State level.

Although the demands on Public Safety have increased, the advantage of the partnership with PATH is that the interactions with persons experiencing homelessness can be tailored to their specific needs and that a case file can be started to align a customer with all available

services and potential benefits, with the goal of placing the individual into transitional and/or permanent housing. PATH continues to expand on cooperative outreach with local faith-based organizations, such as Harbor Interfaith Services.

Yet, with the continued growth in the homeless population, and logistical complexities with PATH and the faith-based organizations connecting persons experiencing homelessness with the programs they need due to the transient nature of daily activities, in 2019 the Redondo Beach City Council determined that additional resources and local strategies needed to be implemented.

An Enhanced Response Pilot Program was initiated by the City in June 2019 as a response to the impact of homelessness not only on individuals experiencing homelessness but also on residents and the local community. The City sought a variety of creative and novel efforts ranging from innovative policing, modifications to the municipal code, and utilizing the criminal justice system as tools to minimize impacts on the community while striving towards the goal of housing homeless defendants. With the COVID-19 emergencies since 2020, there has been additional need to provide safe care and housing for those experiencing homelessness.

To further the effectiveness of the Redondo Beach Enhanced Response to Homelessness Pilot Program, in 2020, City Council authorized numerous creative initiatives, including the following:

- Homeless Court. Homeless Court assists people experiencing homelessness who suffer from mental illnesses, struggle with substance abuse and addiction, and commit crimes of opportunity. The housing navigators and services brought to Homeless Court assist such individuals to curtail the criminal cycle of drug, alcohol, quality of life, and theft offenses by meeting misdemeanor defendants in Los Angeles County on designated “Homeless Court” dates to offer accessible community services and legal services. These services aim to get defendants housing ready and eventually permanently housed in order to graduate from Homeless Court and get their criminal charges dismissed. CDBG funds cover personnel and non-personnel costs.
- Mental Health Treatment Program. A significant percentage of the Homeless individuals who end up in criminal court have underlying chronic mental health conditions. Mental health treatment is vital and often necessary to get a homeless individual “Housing Ready.” The available treatment facilities are frequently overwhelmed with patients or they are otherwise difficult for homeless defendants to access. Since the inception of Enhanced Response to Homelessness Pilot Program it has been understood that access to Mental Health Services would be an important part of the program. Fortunately, the City has located a willing partner to address this unmet need. Clear Recovery Center is a South Bay based mental health treatment and substance abuse treatment provider that provides a full continuum of care. Their treatment is individualized, evidence-based and age-specific in order to give their clients the best possible chance at long term recovery. They pride themselves on their expert clinical team who is highly skilled in the latest in evidence-based treatments

and therapies. Clear Recovery Center has offered to donate \$5,000 per month of professional clinical services for a mental health treatment program to assist the homeless. Additionally, the City has continued to seek funding to purchase additional hours of counseling depending on the level of ongoing demand for these services.

- Transitional Housing. Transitional or bridge housing brings stabilization to people experiencing homelessness and helps them acclimate to a more structured lifestyle that will allow them to take the necessary steps towards permanent housing. Redondo Beach instituted bridge housing, in the design of Pallet Shelter housing, in December of 2020. These Pallet Shelters are individual temporary homeless structures (15 structures total), located at 1521 Kingsdale Avenue in Redondo Beach on the lot where the City's Transit Center is being constructed in the northern part of the City. The Pallet Shelters were initially jointly funded for 6 months by the City of Redondo Beach and the County using Community Development Block Grant funds. In June 2021, the City Council approved an amendment to the funding agreement with the County to continue to provide the shelters.
- Permanent Supportive Housing. The State of California established a program for funding for various housing projects through the Project Homekey program. Century Housing Corporation, a nonprofit housing development organization, is partnering with Los Angeles County as a co-applicant for funding to acquire and renovate a hotel site in south Redondo Beach for permanent supportive housing. On November 9, 2021, the Redondo Beach City Council voted unanimously to support the Homekey Round 2 application from the joint applicants of Century Housing Corporation and Los Angeles County to provide housing for those who are experiencing homelessness or at risk of becoming homeless. The application was submitted and supplemental information is being considered in early 2022. Once funding is obtained, the acquisition and remodeling can begin in 2022 to develop 20 units of affordable housing in the form of permanent supportive housing.

On April 13, 2021, the Mayor and City Council voted to make the Enhanced Response to Homelessness Pilot Program permanent and to remain under the City Attorney's Department for the next four years.

These efforts to address homelessness are included in the Housing Element and demonstrate the City's commitment to Affirmatively Further Fair Housing.

### **Housing Element Document**

As described in this Executive Summary, Redondo Beach is already seeking to overcome obstacles to providing housing. From prior zoning efforts and development projects, to planning for ADUs and inclusionary housing, to aggressively finding solutions to homelessness, the City of Redondo Beach is committed to providing for a broad range of housing types and densities.

This Housing Element will substantiate the City of Redondo Beach’s efforts to accommodate the RHNA obligation, provide housing programs to improve access to affordable housing, and ensure that the City is Affirmatively Furthering Fair Housing.

## 2.2.1 Introduction

The Housing Element represents an awareness of the need within the City of Redondo Beach to assure that housing is provided for all economic segments of the community. The Element also satisfies the legal requirements that housing policy be a part of the General Plan. For the sixth update cycle for jurisdictions in the Southern California Association of Governments (SCAG) region, the Housing Element covers a planning period of October 15, 2021 through October 15, 2029.

### A. Community Context

Located in the South Bay region of the greater Los Angeles area, the City of Redondo Beach encompasses about six square miles of land area. Surrounding communities include Manhattan Beach, Hermosa Beach, El Segundo, Torrance, Lawndale, and the Palos Verdes Peninsula.

In 2020, the City population was estimated to be 66,994, an increase of about 0.4 percent from 66,748 since 2010. Redondo Beach offers a mix of housing types. Approximately 41 percent of the City's residential land is designated for single-family compared to 59 percent to multi-family housing. The proportion of single-family residential land use in Redondo Beach is the lowest among its nearby neighbors such as Manhattan Beach, Hermosa Beach, or El Segundo. Single-family homes make up about 54 percent of the housing stock, the multi-family share is approximately 46 percent, and mobile homes comprise less than one percent. However, over two-thirds of the Redondo Beach housing stock is 40 or more years old (built before 1980). Many homes are well maintained though and programs offered by the City to encourage rehabilitation will prevent continued deterioration.

The City has changed demographically throughout the last decade. In 2010, approximately 65 percent of the population was White. The Asian and Hispanic share of the population was 12 percent and 15 percent, respectively. The 2015-2019 American Community Survey (ACS)<sup>1</sup> documented an increase in Hispanic residents to 16 percent of the City population. The share of Asian residents also increased, to 13.5 percent.

### B. Role of Housing Element

The Housing Element is concerned with specifically identifying ways in which the housing needs of existing and future resident populations can be met. This Housing Element represents the City of Redondo Beach's sixth Housing Element update and covers a planning period of October 15, 2021 to October 15, 2029. The Housing Element identifies strategies and programs that focus on:

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<sup>1</sup> The 2015-2019 ACS developed by the Census Bureau is the primary source of data available for providing a community context. This dataset is the most comprehensive dataset available. However, ACS is a survey of about five percent of the community and extrapolated to represent the entire community. Interpretation of ACS data should focus on relative proportions rather than in absolute numbers, as recommended by the Census Bureau.

- Conserving and improving existing affordable housing;
- Providing adequate housing sites;
- Assisting in the development of affordable housing;
- Removing governmental and other constraints to housing development; and
- Promoting equal housing opportunities.

An important goal of this element is to preserve the character of existing single-family residential neighborhoods and continue to improve the low, medium, and higher density multi-family residential neighborhoods. Diversity in the types of housing in the City is necessary to accommodate a population with varying socioeconomic needs. This Housing Element provides policies and programs to address these issues. The Redondo Beach Housing Element consists of the following major components:

- Introduction: An overview of the purpose and contents of the Housing Element (Section 2.2.1).
- Housing Needs and Resources: An analysis of the demographic and housing characteristics and trends (Section 2.2.2).
- Constraints on Housing Production: A review of potential market, governmental, and environmental constraints to meeting the identified housing needs (Section 2.2.3).
- Housing Resources: An evaluation of resources available to address housing goals (Section 2.2.4).
- Housing Plan: A statement of the Housing Plan to address the identified housing needs, including housing goals, policies and programs (Section 2.2.5).

The Housing Element also includes several appendices that provide detailed background information on the analysis.

### **C. Public Participation**

Participation by all economic segments in the preparation of the Housing Element is important to the City of Redondo Beach and required by State law. Section 65583(c)(7) of the Government Code states, “The local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” This process not only includes residents of the community, but also coordinates participation among local agencies and housing groups, community organizations, and housing sponsors.

The City of Redondo Beach is in the process of updating its General Plan. A General Plan Advisory Committee (GPAC) was established and met 22 times over the course of four years to discuss various topics regarding the General Plan, including a Land Use Plan that reevaluated the City’s residential development potential and mixed use policy. GPAC consists of 27 community members and regularly discussed land use, including residential uses, and other issues relating to parks and recreation opportunities.



The City maintains a General Plan update website – PlanRedondo – where the public can obtain background information on the General Plan and information on meetings and outcomes. Additionally, the City regularly updates a dedicated social media page on Facebook and sends regular e-blast updates to over 10,000 email addresses of interested parties.

[https://www.redondo.org/depts/community\\_development/planredondo/default.asp](https://www.redondo.org/depts/community_development/planredondo/default.asp)

The various community input opportunities are summarized in Appendix C.

#### **D. Availability of Housing Element for Public Review**

The 2021-2029 Redondo Beach Housing Element was originally adopted on October 5, 2021 and submitted to HCD for review on October 7, 2021. On January 5, 2022, HCD completed its review of the adopted Housing Element and determined that additional revisions are necessary to comply with State law. The City made the revised Housing Element available on City website for public review on February 1, 2022. Notifications were sent to the City’s list of stakeholders and individuals, agencies, and organizations that had previously commented on the Housing Element. On February 8, 2022, the City Council adopted the revised Housing Element.

#### **E. Relationship to Other General Plan Elements**

The Housing Element is one of the mandated elements of the General Plan, and internal consistency is required between all the elements. For example, the inclusion of adequate sites to meet future housing needs identified in the Housing Element must be consistent with residential land use and density policies in the Land Use element and with infrastructure policies in the Circulation element and other elements of the General Plan.

The City is in the process of conducting updates to the: Land Use Element, Safety Element (inclusive of the Noise Element), Conservation, Parks and Recreation, and Open Space, and Environmental Justice Elements of the City’s General Plan. This Housing Element is consistent with the Preferred Land Use Plan developed as part of the General Plan update. The City will conduct a comprehensive environmental review of the recommended Land Use Plan as part of the review process for Land Use Element update.

## 2.2.2 Housing Needs and Resources

To assess the housing needs of the City of Redondo Beach, it is important to know the characteristics of the population and the existing housing stock. The following community housing profile is based on HCD Pre-Certified Local Housing Data developed by the Southern California Association of Governments (SCAG) and supplemented with data obtained from the Census, American Community Survey (ACS), and other sources.

### A. Population

#### 1. Population Growth Trends

Population within the City of Redondo Beach grew rapidly between 1900 and 1970 (see [Table H-1](#)). This period of rapid population growth, however, was followed by a period of much slower growth from 1970 to the present. Furthermore, about one-half of the reported population growth during the 1980s was the result of the annexation of the Clifton Heights area in 1982. Since 1990, the City's population has increased by approximately five percent every decade until recently. The 2020 population is estimated at 66,994 by the State Department of Finance (DOF), an increase of 0.4 percent since the 2010 Census, reflecting the built out character of the community.

Year	Population	% Change
1900	855	---
1910	2,935	243.3
1920	4,913	67.4
1930	9,347	90.3
1940	13,092	40.1
1950	25,226	92.7
1960	46,986	86.3
1970	56,075	19.3
1980	57,102	1.8
1990	60,167	5.4
2000	63,261	5.1
2010	66,748	5.5
2020	66,994	0.4

Sources: Bureau of the Census (1900-2010) and State Department of Finance (2020).

## 2. Housing Growth Trends

Relative to population growth, housing units and households have seen more dramatic increases since 1960 ([Table H-2](#)). From 1960 to 1970, the number of housing units and households increased 30 percent and 29 percent, respectively; whereas, the City’s population increased only 19 percent during this same period. Significant housing unit and household growth continued into the 1970s, before slowing considerably in the years following 1980. Between 2000 and 2010, 1,066 housing units were added to the City’s housing stock, representing an increase of four percent. However, between 2010 and 2020, the City population increased 0.4 percent along with a housing growth of 0.9 percent. The number of households (occupied housing units) decreased slightly, due to an increased vacancy rate ([Table H-24](#)).

Year	Population	% Change	Housing Units	% Increase	Households	% Increase
1960	46,986	n/a	15,579	n/a	14,522	n/a
1970	56,075	19.3	20,251	30.0	18,795	29.4
1980	57,102	1.8	25,867	27.7	24,637	31.1
1990	60,167	5.4	28,220	9.1	26,717	8.4
2000	63,261	5.1	29,543	4.7	28,566	6.9
2010	66,748	5.5	30,609	3.6	29,011	1.6
2020	66,994	0.4	30,892	0.9	29,002	-0.03

Sources: Bureau of the Census (1960-2010) and State Department of Finance (2020)

## 3. Age Distribution

A population’s age characteristics are also an important factor in evaluating housing needs and determining the direction of future housing development. Typically, distinct lifestyles, family types and sizes, incomes, and housing preferences accompany different age groups. As people move through each stage of life, housing needs and preferences change. For example, young householders without children usually have different housing preferences than middle-age householders with children or senior householders living alone. Redondo Beach residents under 18 years of age represented 16.2 percent of the population, lower than the County share of 18.8 percent. The population aged 55 years and older expanded during this time period.

The age distribution of the City’s population between 2000 and 2019 is depicted in Table H-3 and shown alongside the age distribution for the County of Los Angeles. The proportion of the population under 20 years old increased, especially during the last decade, while the population between the ages of 20 and 54 (working age) decreased during the same period. The population aged 55 years expanded during this time period.

Age Group	Redondo Beach					County of Los Angeles				
	% Share in Population			Change in Proportional Share		% Share in Population			Change in Proportional Share	
	2000	2010	2019	2000-2010	2010-2019	2000	2010	2019	2000-2010	2010-2019
Under 5	5.7	6.3	9.1	0.6	2.8	7.8	6.6	5.8	-1.2	-0.8
5-19	14.6	14.7	16.2	0.1	1.5	23.2	21.0	18.8	-2.2	-2.2
20-34	25.5	21.1	17.9	-4.4	-3.2	24.0	22.7	23.7	-1.3	1.0
35-54	37.7	35.2	31.4	-2.5	-3.8	28.05	28.5	27.2	0.45	-1.3
55+	16.5	22.7	25.3	6.2	2.6	17.0	21.2	24.3	4.2	3.1
Median Age	36.7	39.3	38.7	2.6	-0.6	32.0	34.8	37.0	2.8	2.2

Sources: Bureau of the Census (1960-2010) and ACS 2019 1-Year estimate

#### 4. Race and Ethnicity

Household characteristics, income levels, and cultural backgrounds tend to vary by race and ethnicity, often affecting housing needs and preferences. In general, Hispanic and Asian households exhibit a greater propensity than White households for living with extended family members, which often leads to increased household size.

Since 2000 the City’s population has become more racially/ethnically diverse. Approximately 60 percent of Redondo Beach residents in 2019 were non-Hispanic Whites, compared to 65.2 percent in 2010 (Table H-4), and 70.8 percent in 2000. The Asian population increased from 9 percent of the total population in 2000 to 13.5 percent in 2019. And, the Black population also increased very slightly from 2.4 percent of the total population in 2000 to approximately 3.1 percent in 2020. The City’s Hispanic population increased from approximately 13.5 percent of the total population in 2000 to 16 percent in 2019. Overall, the racial and ethnic composition of Redondo Beach residents differs from the County profile. The County of 10 million people has a more diverse profile, although the often the different racial/ethnic groups also tend to concentrate in different subregions.

Race/Ethnicity	2000		2010		2019		2019
	Number	%	Number	%	Number	%	LA County %
Not of Hispanic Origin							
Total	54,737	86.5	56,606	84.8	56,652	84.0	51.4
White	44,819	70.8	43,531	65.2	40,679	60.3	25.9
Black	1,531	2.4	1,772	2.7	2,111	3.1	7.7
Asian	5,677	9.0	7,858	11.8	9,101	13.5	14.5
Native American	185	0.3	163	0.2	183	0.3	0.2
Other	2,525	4.0	3,282	4.9	4,578	6.8	3.1
Hispanic Origin							
Total	8,524	13.5	10,142	15.2	10,771	16.0	48.6
White	4,916	7.8	6,274	9.4	7,174	10.6	26.3
Black	61	0.1	80	0.1	217	0.3	0.3
Asian	79	0.1	146	0.2	38	0.1	0.2
Native American	110	0.2	128	0.2	101	0.1	0.0
Other	3,358	5.3	3,514	5.3	3,241	4.8	21.8
TOTAL	63,261	100.0	66,748	100.0	67,423	100.0	100.0
Source: Bureau of the Census (1990-2010) and 2015-2019 ACS.							

## 5. Employment

The Census provides employment information about the City’s residents, including the number of persons employed in a particular industry and whether they are employed by businesses either outside or within their community. In 2019, 39,166 Redondo Beach residents aged 16 and over were in the labor force, representing a participation rate of 72.5 percent. About 2.7 percent of the City’s residents were unemployed, a decrease from the unemployment rate of 4 percent in 2000. COVID-19, however, has significantly impacted the employment situation in Redondo Beach, along with most communities in California. In June 2020, the unemployment rate in Redondo Beach was reported at 13.7 percent. Recovery is underway, with April 2021 unemployment rate reported at 8.2 percent, according to the State Employment Development Department. The City’s pre-COVID unemployment rate was 4.7 percent in March 2020.

The types of jobs held by Redondo Beach residents in 2019 are shown in [Table H-5](#). The most noticeable change is the increase in the number of residents employed in management and professional occupations, which accounted for 60.5 percent of jobs in 2019 and 53.1 percent of jobs in 2000, and the decrease in sales and office occupations from 26.5 percent to 20.6 percent during the same period.

<b>Table H-5: Jobs Held by Redondo Beach Residents</b>				
<b>Job Category</b>	<b>2000</b>		<b>2019</b>	
	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Management, Business, Science, and Arts Occupations	20,249	53.1	22,712	60.5
Service Occupations	3,827	10.0	3,819	10.2
Sales and Office Occupations	10,092	26.5	7,745	20.6
Natural resources, construction, and maintenance occupations	2,073	5.4	1,174	3.1
Production, transportation, and material moving occupations	1,865	4.9	2,121	5.6
Total Employed Persons (16 Years & Over)	38,106	100.0	37,571	100.0
Source: Bureau of the Census, 2015-2019 ACS.				

Certain occupations are associated with higher earned incomes. Legal and managerial occupations, for example, were the highest paying occupations in the Los Angeles Metropolitan region during the first quarter of 2020 (Table H-6). By contrast, farming and food preparation occupations were among the lowest paid occupations. In 2015-2019, a large proportion of Redondo Beach residents (60.5 percent) were employed in typically high earning occupations (Table H-5). Government and retail employers accounted for four of the top ten principal employers in the City in 2019 (Table H-7).

<b>Occupations</b>	<b>Average Salary \$</b>
Legal	132,856
Management	136,326
Architecture and Engineering	103,803
Healthcare Practitioners and Technical	100,721
Computer and Mathematical	102,452
Arts, Design, Entertainment, Sports and Media	88,286
Business and Financial Operations	85,014
Life, Physical and Social Science	93,101
Education, Training and Library	71,575
Community and Social Service	81,283
Construction and Extraction	61,850
<b>All Occupations</b>	<b>62,005</b>
Protective Service	63,863
Installation, Maintenance and Repair	57,329
Sales	37,107
Office and Administrative Support	46,702
Transportation and Material Moving	42,940
Healthcare Support	34,776
Production	53,095
Farming, Fishing and Forestry	36,515
Building, Grounds Cleaning, and Maintenance	27,885
Personal Care and Service	37,086
Food Preparation and Serving Related	32,237
Source: State Employment Development Department, 2020	

<b>Employer</b>	<b>Industry</b>	<b>Number of Employees</b>
Northrop Grunman (TRW)	Manufacturing	6,045
Redondo Beach Unified School District	Education	868
City of Redondo Beach	Government	402
The Cheesecake Factory	Restaurant	261
United States Post Office	Government	260
Target Store	Retail	241
Macy's (Robinson's May)	Retail	232
DHL Global Forwarding	Shipping	227
Frontier	Communications	164
Silverado Beach Cities	Residential Care	140
Source: City of Redondo Beach, FY 2020 CAFR.		

## B. Households

### 1. Household Composition

A household is defined as all the people occupying a dwelling unit, whether or not they are related. A single person living in an apartment, or a married couple with children in a single-family dwelling, are each considered a household. Since different types of households need or prefer different types of housing, this information can be useful in assessing the types of housing needed in the City.

[Table H-8](#) compares the types of households in Redondo Beach over time since 2000. Households are classified as “family” households or “non-family” households. “Family” households are those in which the head of household lives together with one or more related persons. “Non-family” households consist of a group of unrelated persons or a single person living alone.

The number of households in Redondo Beach has decreased over time and the household composition had shifted somewhat. In 2019, Redondo Beach had more family (61 percent) than non-family (39 percent) households ([Table H-8](#)). The number of families in the City has increased while the number of people living in non-family households decreased.

Household Types	2000		2010		2019		Percent Change			
							2000-2010		2010-2019	
	#	%	#	%	#	%	#	%	#	%
<b>Families</b>	15,330	53.6%	16,011	56.1%	16,684	60.9%	681	4.4%	673	4.2%
Married w/ Children	5,015	17.5%	7,877	27.6%	6,363	23.0%	2,862	57.1%	-1,514	-19.2%
Married w/o Children	6,683	23.4%	4,452	15.6%	7,233	20.0%	-2,231	-33.4%	2,781	62.5%
Other Families	3,632	12.7%	3,682	12.9%	3,088	11.9%	50	1.4%	-594	-16.1%
<b>Non-Families</b>	13,264	46.4%	12,259	43.9%	10,799	39.1%	-1,005	-7.6%	-1,460	-11.9%
Single	9,445	33.0%	9,618	33.7%	8,355	29.8%	173	1.8%	-1,263	-13.1%
Other Non-Families	3,819	13.4%	2,911	10.2%	2,444	9.3%	-908	-23.8%	-467	-16.0%
<b>Total Households</b>	28,594	100.0%	28,540	100.0%	27,663	100.0%	-54	-0.2%	-877	-3.1%

Source: Bureau of the Census, 2015-2019 ACS.

### 2. Household Size

Household size affects the housing needs of a community and may indicate the presence of potential housing problems, such as overcrowding. The average size of Redondo Beach households declined over time from a peak of 3.29 persons (in 1960) to 2.21 persons (in 2000), but bounced back slightly to 2.29 persons in 2010 ([Table H-9](#)). This trend continued in 2019 (2.43 persons). Household size in the City is smaller than the 2019 countywide average of 2.96 persons. This is consistent with the small increase in population but 3.3 percent decrease in the number of households.



Year	Persons Per Household
1960	3.29
1970	2.84
1980	2.31
1990	2.25
2000	2.21
2010	2.29
2019*	2.43
Sources: Bureau of the Census (2010); *ACS (2019).	

Nearly one-third (30.2 percent) of all households in the City were comprised of single person households and another one-third (34 percent) had only two persons ([Table H-10](#)). Household size also varied by tenure, with owner-occupied units averaging 2.4 persons per units and renter-households averaging approximately 2.1 persons per unit. Furthermore, about 22.3 percent of owner-occupied units were comprised of four or more persons in 2019, while about 16 percent of renter-occupied units had four or more persons.

Household Size	All Households		Owner-occupied units		Renter-occupied units	
	Number	%	Number	%	Number	%
1 Person	8,355	30.2	3,386	23.4	4,987	37.5
2 Persons	9,400	34	5,016	34.9	4,384	33
3 Persons	4,597	16.6	2,781	19.4	1,816	13.7
4 Persons or more	5,311	19.2	3,200	22.3	2,111	15.9
Source: ACS 2015-2019.						

### 3. Household Income

Median household income in Redondo Beach has increased since 2000 and is related to the City’s favorable coastal location and high real estate values. Household, family, and per capita income have all increased over the past two decades (Table H-11). While the increase is less over the past five years in Redondo Beach than over the fifteen years prior, incomes remain substantially higher than levels than the County (Table H-12).

	2000	2015	2019	Increase		% Increase	
				2000-2015	2015-2019	2000-2015	2015-2019
Median Household Income	\$69,173	\$105,145	\$113,499	\$35,972	\$8,354	52.0	7.9
Median Family Income	\$80,543	\$122,895	\$140,227	\$42,352	\$17,332	52.6	14.1
Per Capita Income	\$38,305	\$53,001	\$62,528	\$14,696	\$9,527	38.4	18.0

Source: Bureau of the Census (2000); American Community Survey (2015-2019 5-year estimates)

	2000	2015	2019	Increase		% Increase	
				1990-2000	2015-2019	2000-2015	2015-2019
Median Household Income	\$42,189	\$56,196	\$72,797	\$7,224	\$14,007	33.2	24.9
Median Family Income	\$46,452	\$62,703	\$81,912	\$7,417	\$16,251	35.0	25.9
Per Capita Income	\$20,683	\$28,337	\$36,044	\$4,534	\$7,654	37.0	27.0

Source: Bureau of the Census (2000); American Community Survey (2015-2019 5-year estimates)

To facilitate the analysis of income distribution among households in communities, the State Department of Housing and Community Development (HCD) groups households into categories by income. Income categories are determined as a percentage of the Area Median Income (AMI) and then adjusted for household size in the following manner:

- Extremely Low Income – 0 to 30 percent AMI
- Very Low Income – 31 to 50 percent of the AMI
- Low Income – 51 to 80 percent of the AMI
- Moderate Income – 81 to 120 percent of the AMI
- Above Moderate Income – above 120 percent of the AMI

As shown below, according to the Southern California Association of Governments (using 2014-2018 ACS data), approximately 22 percent of the City’s households earned lower incomes, 11 percent earned moderate income, while approximately 67 percent earned above moderate incomes. In comparison, countywide 41 percent of the households earned lower income and 42 percent earned above moderate income.

Classification	Redondo Beach	Los Angeles County
	%	%
Very Low Income	13	26
Low Income	9	15
Moderate	11	16
Above Moderate	67	42
Total	100.0	100.0

Source: SCAG RHNA Calculator, March 2021.

### **C. Housing Problems**

The CHAS data also provides detailed information on housing needs by income level for different types of households in Redondo Beach. The latest detailed CHAS data, based on the 2013-2017 ACS, is displayed in ([Table H-14](#)). Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30 percent of gross income; or
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

The types of problems vary according to household income, type, and tenure. Some highlights include:

- In general, renter-households had a higher level of housing problems (43.6 percent) compared to owner-households (38.1 percent).
- Large families who were owners (57.2 percent) and elderly renters (60.3 percent) had the highest level of housing problems regardless of income level.
- Very low income and extremely low income renter-households had the highest incidence of housing problems (91.1 percent and 82.1 percent, respectively).

Household by Type, Income, and Housing Problem	Renters				Owners				Total Households
	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Families	Total Owners	
Extremely Low Income (0-30% AMI)	510	195	15	1,370	470	115	0	695	2,065
% with any housing problem	88.2%	87.2%	100.0%	82.1%	83.0%	78.3%	0%	82.0%	82.1%
% with cost burden >30%	88.2%	79.5%	0.0%	79.9%	81.9%	78.3%	0%	80.6%	80.1%
% with cost burden > 50%	72.5%	79.5%	0.0%	74.1%	72.3%	60.9%	0%	69.8%	72.6%
Very Low Income (31-50% AMI)	450	645	15	1,520	735	160	25	995	2,515
% with any housing problem	74.4%	96.9%	100.0%	91.1%	55.1%	93.8%	16.0%	62.2%	79.7%
% with cost burden >30%	74.4%	96.9%	100.0%	91.1%	55.1%	93.8%	16.0%	62.7%	79.9%
% with cost burden >50%	64.4%	60.5%	100.0%	70.1%	40.1%	81.3%	16.0%	47.1%	61.0%
Low Income (51-80% AMI)	285	810	55	1,685	570	230	35	950	2,635
% with any housing problem	78.9%	88.3%	100.0%	89.6%	51.8%	58.7%	100.0%	55.3%	77.2%
% with cost burden >30%	75.4%	88.3%	100.0%	89.3%	52.6%	60.9%	97.1%	56.2%	77.4%
% with cost burden > 50%	29.8%	29.0%	0.0%	31.5%	25.4%	39.1%	11.4%	29.9%	30.9%
Moderate/Upper Income (>80% AMI)	760	4,140	530	9,265	2,565	6,510	515	11,335	20,600
% with any housing problem	26.3%	21.7%	37.7%	21.8%	24.0%	22.5%	56.3%	25.1%	23.6%
% with cost burden >30%	25.0%	16.9%	13.0%	17.5%	23.6%	22.4%	48.5%	24.6%	21.4%
% with cost burden > 50%	4.6%	1.2%	0.0%	1.4%	6.2%	5.4%	9.7%	6.3%	4.1%
Total Households	2,005	5,790	615	13,840	4,340	7,015	575	13,975	27,815
% with any housing problem	60.3%	41.6%	46.3%	43.6%	39.3%	26.2%	57.2%	32.6%	38.1%
% with cost burden >30%	59.4%	37.9%	22.6%	40.5%	39.1%	26.2%	50.1%	32.2%	36.3%
% with cost burden > 50%	38.9%	14.3%	2.4%	19.8%	21.7%	9.1%	10.1%	14.0%	16.9%
<p>Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.</p> <p>Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017 ACS data.</p>									

## 1. Cost Burden

It is important to identify the rate of housing cost burden in a community in order to assess the availability of affordable housing. Cost burden is defined as households paying more than 30 percent of their income for housing. When a household overpays for housing, it has less available income for other necessities such as healthcare, food, and transportation, thereby impacting quality of life.

As shown in [Table H-14](#), the prevalence of cost burden generally increases as income decreases. Cost burden impacted extremely low and very low income households almost equally, and renter-households were more impacted by cost burden than owner-households overall.

In terms of household type, cost burden was almost indiscriminate, impacting virtually all household types in the extremely low and very low income levels, although low income elderly owner households were less affected by cost burden than other types of households.

## 2. Overcrowding

The State Department of Housing and Community Development (HCD) defines overcrowding as a household with more than one person in a room (excluding bathrooms and the kitchen). Severe overcrowding is more than 1.5 persons per room. Overcrowding occurs when there are not enough adequately sized housing units in a community that are affordable to households with various income levels. When this occurs, families may live in housing units that are too small in order to afford other necessities or they may “double-up” with other families. Overcrowding is a serious health and safety concern and must be addressed appropriately.

[Table H-15](#) shows that overcrowding in the City has declined dramatically since 1990. This may be partly due to the replacement of many traditional family households with single-person and single-parent family households. Between 2015 and 2019, approximately 2.2 percent of all units in the City were overcrowded. By comparison, about 11.1 percent of all units in Los Angeles County were overcrowded.

	1990	2000	2011-2015	2015-2019
Total Occupied Units	26,717	28,566	27,733	27,663
Total Overcrowded	1,099	1,201	493	603
Percent Overcrowded	4.1	4.2	1.8	2.2

Source: Bureau of the Census (1970, 1980, 1990, and 2000) and American Community Survey (2011-2015; 2015-2019).

The incidence of overcrowding varies by tenure. In Los Angeles County, 16.2 percent of renters face severe overcrowding, while 11.3 percent of owners according to the 2015-2019 ACS. The majority of overcrowded units in Redondo Beach (76.6 percent) had between 1.0 and 1.5 persons per room. Severely overcrowded (more than 1.5 persons per room) households made up the remaining 23.4 percent of overcrowded units. This information is summarized in Table H-16.

Overcrowding typically occurs when there is a lack of housing of the right size and the right price to accommodate the larger households in the City. The number of households in the City with more than five persons has only slightly decreased in recent years, making it more difficult for these households to find and afford an adequately sized unit. In 2010, there were 5.6 percent large households in the City (households with five or more members) compared to 5.1 percent in 2019.

Category	2011-2015		2015-2019	
	Number	%	Number	%
Occupied Housing Units	27,733	100%	27,633	100%
Overcrowded Units	493	1.8%	603	2.2%
Owner-occupied	109	22.1%	172	28.5%
Renter-occupied	384	77.9%	431	71.5%
Units with 1.01-1.50 persons/room	398	80.7%	462	76.6%
Units with 1.51-2.00 persons/room	78	15.8%	102	16.9%
Units with 2.01 or more persons/room	17	3.45%	39	6.5%

Source: American Community Survey (2011-2015; 2015-2019).

#### **D. Special Needs Groups**

Certain segments of the population have greater difficulty in finding decent, affordable housing due to special circumstances including income, employment, disability, or family characteristics, among other things. Persons and households with special needs include seniors, persons with disabilities (including persons with developmental disabilities), large households, single-parent households, persons living in poverty, farmworkers and the homeless. These groups may have more difficulty finding affordable housing, and typically are the groups most in need of assistance. [Table H-17](#) summarizes Redondo Beach’s special needs population and [Table H-21](#), located at the end of this section, provides an inventory of resources available to serve these groups.

<b>Special Needs Group</b>	<b># of Persons or Households</b>	<b># of Owners</b>	<b># of Renters</b>	<b>% of Total Households or Persons</b>
Households w/ members age 65+	8,913	--	--	13.2
Elderly (65+) headed households	5,793	4,444 (30.9%)	1,349 (10.2%)	20.9
Elderly living alone	2,683	1,678 (12.0%)	992 (7.3%)	9.7
Disabled persons	4,369	--	--	6.5
Large households (5+ persons)	1,412	691 (48.9%)	721 (51.1%)	5.1
Single-Parent Households	3,283	--	--	11.8
Female headed households with children	2,111	--	--	7.6
Residents living below poverty*	2,629	--	--	3.9
Farmworkers	0	--	--	--
Homeless*	176	--	--	<1

Source: 2015-2019 ACS, \*2020 Greater Los Angeles Homeless Count Report, LAHSA

## Seniors

Seniors face unique housing circumstances because of three factors: a limited or fixed income; health care costs; and disabilities. Between 2015 and 2019, 8,913 Redondo households included senior members (age 65 and over), representing 13.2 percent of the City’s total households. Furthermore, approximately 5,793 Redondo Beach households (20.9 percent of total households) were headed by persons over age 65. Of all owner-households, 30.9 percent were headed by seniors and of all renter-households, 10.2 percent were headed by seniors.

Many seniors are retired and/or living on fixed incomes and may not be able to afford major home repairs or large increases in rent. Between 2015 and 2019, 2,629 people living below the poverty level in Redondo Beach, and approximately seven percent were seniors. As shown in [Table H-14](#), 60 percent of elderly renter-households experienced housing problems, in comparison to 40 percent of elderly owner-households. Approximately 60 percent of elderly renter-households had a cost burden greater than 30 percent.

### **Resources Available**

The special needs of seniors can be met through a range of services, including congregate care, rent subsidies, shared housing, and housing rehabilitation assistance. According to Community Care Licensing Division records, as of May 2021, six residential care facilities for the elderly offer a combined capacity of 282 beds.

The City’s Community Services Department provides programs, services, information, and referrals that promote physical and mental health for the expanding senior population in the City. Senior residents have access to services at multiple Senior Center locations at Anderson Park, Perry Park, and Veterans Park. Additional resources are detailed in [Table H-21](#).

## Persons with Disabilities

Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one's mobility, or make it difficult to care for oneself. Thus, disabled persons often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. Some residents in Redondo Beach have disabilities that prevent them from working, restrict their mobility, or make it difficult to care for themselves. An additional segment of residents suffers from disabilities that require living in an institutional setting. Because of these conditions, persons with disabilities have special housing needs.

According to 2015-2019 ACS data, disabled persons make up approximately 6.5 percent of the population in Redondo Beach. Between 2015 and 2019, 45 percent of the City's population with disabilities was made up of residents aged 65 and older, while 51 percent were aged 18 to 64. Of the residents 65 years and older, ambulatory, hearing and independent living difficulties were prevalent ([Table H-18](#)).

Disabled individuals have unique housing needs because they may be limited in mobility or ability to care for themselves. In addition, the earning power of disabled persons may be limited. Their housing need is compounded by design and location requirements which often increase housing costs. For example, special needs of households with wheelchair-bound or semi-ambulatory individuals may require ramps, holding bars, special bathroom designs, wider doorways, lower cabinets, and other interior and exterior design features. Affordable housing and housing programs that address accessibility can assist persons with disabilities.

The housing needs of disabled persons in Redondo Beach are of particular importance because as a built-out community, about 66 percent of the City's housing units were more than 40 years old and another 25 percent reaching at least 30 years old during this Housing Element planning period. Therefore, the majority of the City's housing stock does not comply with the American with Disabilities Act for accessibility. Housing options for persons with disabilities in the community are limited.



Disability Type	% of Disabilities Talled			
	Age 5 to 17	Age 18 to 64	Age 65+	Total
With a hearing difficulty	21.3%	14.3%	23.0%	18.5%
With a vision difficulty	13.2%	11.6%	8.5%	10.3%
With a cognitive difficulty	39.2%	21.1%	11.3%	17.4%
With an ambulatory difficulty	13.2%	23.6%	31.8%	26.9%
With a self-care difficulty	13.1%	9.5%	7.1%	8.6%
With an independent living difficulty	--	19.9%	18.3%	18.3%
Total Persons with Disabilities	357	4,319	3,819	8,495
Note: 1. Persons under 5 years of age are not included in this table. 2. Persons may have multiple disabilities. Source: American Community Survey (2015-2019).				

**Persons with Developmental Disabilities**

A recent change in State law requires that the Housing Element discuss the housing needs of persons with developmental disabilities. As defined by the Section 4512 of the Welfare and Institutions Code, “developmental disability” means “a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. As defined by the Director of Developmental Services, in consultation with the Superintendent of Public Instruction, this term shall include mental retardation, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to mental retardation or to require treatment similar to that required for individuals with mental retardation, but shall not include other handicapping conditions that are solely physical in nature.” This definition also reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

In Redondo Beach, there are 342 people with developmental disabilities according to the State of California Department of Developmental Services ([Table H-19](#)). This represents 0.5 percent of the total population of the City and is about evenly split between adult and children. Furthermore, about 80 percent of these individuals were residing in private home with their parent or guardian and 12 percent were living in a Community Care Facility.

Zip Code	00-17 yrs	18+ yrs	Total All Ages
90277	107	82	189
90278	74	79	153
State of California Department of Developmental Services Consumer Count by California ZIP Code and Age Group Regional Center and Early Start Consumers, December 2020			

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because

developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

### **Resources Available**

From a housing perspective, there are several different housing needs of disabled persons. For those disabled with a developmental or mental disability, one of the most significant problems is securing affordable housing that meets their specialized needs. Housing needs can range from institutional care facilities to facilities that support partial or full independence (such as group care homes). Supportive services such as daily living skills and employment assistance need to be integrated into the housing situation also. The disabled person with a mobility limitation requires housing that is physically accessible.

According to the State's Community Care Licensing Division records, there are six residential care facilities for the elderly in Redondo Beach, with a combined capacity of 282 beds and three adult residential care facilities which provide a capacity for 108 beds. The City's Community Services Department offers a wide range of programs, services, information and referrals to help persons with disabilities. [Table H-21](#) details further assistance programs/services that are available to disabled residents in the City of Redondo Beach.

The Harbor Regional Center provides services for persons with disabilities. It provides support, information, and opportunities for its clients and their families. The Regional Center offers free intake and assessment services and coordinate services (such as mental health, employment, housing options) for the clients based on needs.

### **Large Households**

Large households are defined as those consisting of five or more persons in the same dwelling unit. Large households typically need larger homes with extra rooms in order to avoid overcrowding. While construction trends over recent years have increasingly included the provision of large units, often these larger units are not affordable to large households. It is not uncommon for large, lower income households to save on housing costs by residing in smaller units, resulting in overcrowded living conditions.

As shown earlier in [Table H-17](#), 5.1 percent of Redondo Beach households were considered large households in 2019. The proportion of large households has been steadily declining, from 5.6 percent in 2010, to 5.2 percent in 2015, and 5.1 percent in 2019. Most of these large households (51 percent) rented their homes, while 49 percent owned their homes. The overwhelming majority of households in the City continue to be smaller households.

Lower income large renter-households usually face a number of housing problems, including cost burden, overcrowding, and deteriorated housing conditions. According to data from 2013-2017 on the housing needs of lower income households ([Table H-14](#)), 46 percent of all large renter-households and 57 percent of all large owner-households were experiencing housing problems.

### **Resources Available**

The City’s large households can benefit from City programs and services that provide assistance to lower and moderate income households in general, such as the Housing Choice Voucher program, which offers rental assistance to residents. [Table H-21](#) lists additional resources that may be beneficial to the City’s large households.

### **Single Parent Households**

Single-parent households often require special consideration and assistance as a result of their greater need for affordable housing and accessible day-care, health care, and other supportive services. Female-headed households with children, in particular, tend to have lower incomes than other types of households. Because of their relatively low income, such households often have limited housing options and restricted access to supportive services.

According to the Census, six percent of Redondo Beach households were single-parent households in 2010 and 11.8 percent were single-parent households in 2019 ([Table H-20](#)). There were more female-headed single-parent households than male-headed single-parent households in both 2010 and 2019. According to 2015-2019 ACS data, 5.5 percent of female-headed single-parent households were living below the poverty level.

<b>Table H-20: Single-Parent Households</b>				
<b>Household Type</b>	<b>2010</b>		<b>2019</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Single Male with Children	508	1.8	1,172	4.2
Single Female with Children	1,200	4.1	2,111	7.6
Total Single Parent Households	1,708	5.9	3,283	11.8
Total Households	29,011	100.0	27,621	100.0

Source: American Community Survey (2015-2019).

### **Resources Available**

Limited household income constrains the ability of these households to afford adequate housing and provide for childcare, health care, and other necessities. Finding adequate and affordable childcare is a pressing issue for many families with children. Affordable housing needs of single-parent households are addressed through the City’s affordable housing programs, including Housing Choice Vouchers, and [Table H-21](#) lists youth services and assistance services for households with limited income that may be beneficial to single-parent households.

## **Residents Living Below the Poverty Level**

Families with incomes below the poverty level, typically with extremely low and very low incomes, are at greatest risk of becoming homeless and typically require special programs to assist them in meeting their rent and mortgage obligations so as to not become homeless. The 2015-2019 ACS identified that about four percent of all Redondo Beach residents are living below the poverty level. Approximately two percent of family households in the City were living in poverty. Similarly, two percent of families with children were also living below the poverty level. These households need assistance with housing subsidies, utility and other living expense subsidies, and other supportive services.

### **Resources Available**

Persons living with incomes below the poverty level can benefit from City programs and services that provide assistance to lower income households in general, such as the Housing Choice Voucher program, which offers rental assistance to residents. [Table H-21](#) lists various assistance services for households living in poverty.

## **Farmworkers**

The 2015-2019 ACS indicates that no residents in the City held jobs in agriculture, forestry, fishing and hunting, and mining. Any low income workers are eligible for community-wide housing programs assisting low income residents.

## **Homeless**

Homelessness is a regional (and national) problem, and in a major metropolitan region, individual municipal governments lack the resources to implement solutions to eliminate homelessness. While the exact number of homeless people in the City on any given night is unknown, a relatively small share of the region's homeless population is found in Redondo Beach. The 2020 Greater Los Angeles Homeless Count, completed by the Los Angeles Homeless Services Authority (LAHSA), estimates that there were 173 people experiencing homelessness in Redondo Beach – a decrease from the 216 people in the City during the 2016 LAHSA homeless count.

### **Resources Available**

There are no emergency shelters in the immediate area for homeless men or women who are not victims of domestic violence. San Pedro operates a residential treatment center, Support for Harbor Area Women's Lives (SHAWL) primarily for homeless women who are substance abusers. This center serves most of the South Bay, including Redondo Beach. SHAWL offers counseling services, substance abuse rehabilitation programs, and assistance for women who want to regain custody of their children.

SHAWL also has two transitional housing facilities that aid women as they transition from the primary six-month program: Haviland House and The Cottages. Haviland House provides 11 beds to women for an additional 18 months to two years. The Cottages was established in 2012 and provides four beds for women and four beds for children.

Second Step Shelter, operated by 1736 Family Crisis Center, is the only transitional housing shelter in Redondo Beach. This shelter provides longer-term transitional housing as well as support services to assist its clientele in making the transition to permanent housing and economic self-sufficiency. All clients receive counseling, parenting education, job training, and housing referrals. The shelter has a capacity of 24 beds.

In September 2020, the Redondo Beach Council voted to move forward with a plan to provide temporary homeless shelters on the lot where the City’s Transit Center is being constructed in the northern part of the City. The shelter operations were jointly funded by the City of Redondo Beach and the County using CDBG funds. On June 8, 2021, the City Council approved an amendment to the funding agreement with the County to continue to provide the 15 “pallet shelters” (temporary homeless shelters) at the 1521 Kingsdale site with the potential to increase the number of pallet shelters in the future. The current location will serve as the site until the emergency orders are lifted and then the City Council will decide whether to move the shelters to a different location or have them remain at the Kingsdale site. A zoning change may be needed for the pallet shelters to remain after the emergency orders are lifted. The latest Letter of Agreement extends the program until July 31, 2022 but it allows for extending the term.

<b>Table H-21: Resources for Special Needs Groups</b>		
<b>Special Needs Group</b>	<b>Program</b>	<b>Description</b>
Female Headed Households and Large Households	Afterschool Playground Program	Non-Custodial Afterschool Playground Program
	South Bay Youth Project	Counseling, parenting classes, youth activities.
Households in Poverty	South Bay One Stop Business and Career Centers	Provide business development resources and facilities, staffing assistance, training and job placement services, labor market information, career assessment, workshops.
	First United Methodist Church—Shared Bread	Warm meals and hygiene items when available.
	St. Paul's United Methodist Church—Project: Needs	Home-style dinner for hungry and food pantry.
	St. Andrew's Presbyterian Church	Sack lunch distribution, clothing and canned goods distribution given out with sack lunches.
	St. James Church	Sack lunches
	St. Lawrence Martyr Church	Food pantry (canned and dry food) and food distribution to local residents.
	Salvation Army	Emergency aid, food, referrals to shelters, information and referral.
	Saturday Lunch Program	Saturday lunches provided and supply of food available on an emergency basis.
	South Bay Community Church of the Brethren	Home-style dinner for hungry
Households in Poverty, Disabled Persons, and the Elderly	City of Redondo Beach Section 8	Housing assistance payments on behalf of eligible elderly and very low income families, and disabled persons
	Utility Users Tax Exemption	City tax removed from utility bills. Eligibility based on income, age and/or disability.
Disabled Persons	Access Services	Transportation service throughout Los Angeles county for individuals with disabilities.
Elderly and Disabled Persons	The WAVE	Transportation for registered Hermosa and Redondo Beach residents, who are either seniors (62 and over) or disabled.
	Gardena Special Transit	Provides lift-equipped vehicles to transport Gardena residents age 60 and above and/or disabled.
	Nutrition Program	Senior lunch program available five days a week at two separate sites.
	Income Tax Assistance	Free assistance filing income tax returns for older adults and disabled persons.
Source: City of Redondo Beach, 2021.		

## E. Housing Stock

### 1. Housing Unit Type

The mix of housing units in Redondo Beach has changed significantly since 1960 ([Table H-22:](#)). Single-family detached housing comprised over three-fourths (77 percent) of the City's housing stock in 1960, but by 2015-2019, only about 41 percent of housing units were single-family detached homes. Single-family attached<sup>2</sup> housing grew at a rapid rate during the 1980s (with nearly 3,000 units built), but the pace of single-family attached development has been relatively slow ever since (with only about 762 units built since 1990). Single-family attached housing now comprises 14 percent of the City's housing units.

Apartments made up 44 percent of the City's total housing stock in 2015-2019. Smaller multi-family buildings (with two to four dwellings) comprised about 14 percent of all housing units while larger multi-family buildings (with five or more dwellings) made up 31 percent of units. Meanwhile, the City's inventory of mobile homes decreased significantly between 2000 and 2019.<sup>3</sup> According to the 2000 Census there were 380 mobile homes in Redondo Beach. These homes are located in the City's only remaining mobile home park (along 190<sup>th</sup> Street east of Meyer Lane). These homes are protected under a special Mobile Home Park zoning designation established for the area, which permits no other type of housing except mobile homes. In comparison with nearby cities, Redondo Beach has the lowest proportion of residential land being zoned for single-family use ([Figure H-1](#)). Compared to the region as a whole, the City also has lower proportion of single-family units ([Figure H-2](#))

**Table H-22: Housing Unit Type (1960-2019)**

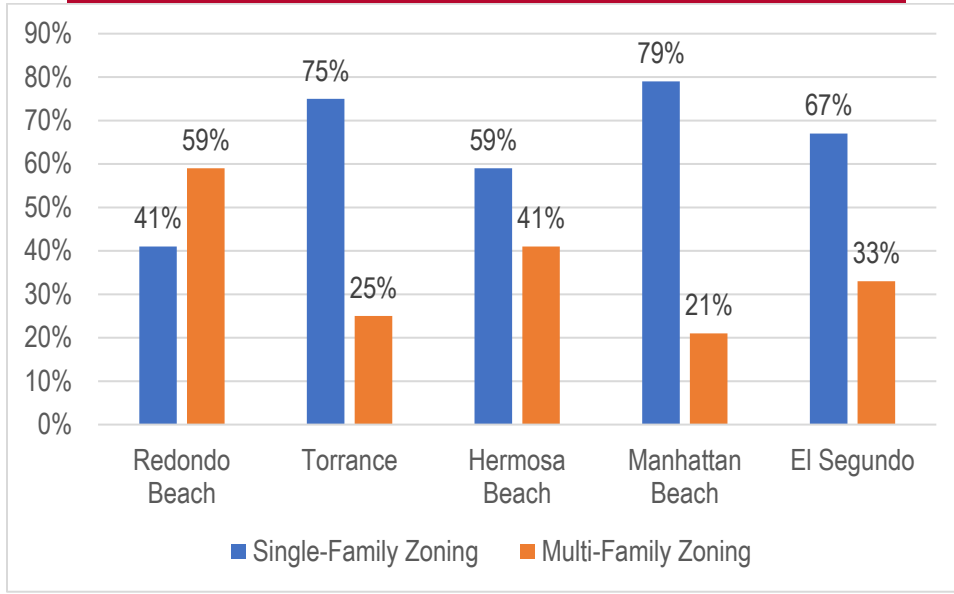
Year	Total	Single-Family (detached)		Single-Family (attached)		2-4 Units		5+ Units		Mobile Homes and Other	
		No.	%	No.	%	No.	%	No.	%	No.	%
1960	15,579	12,060	77.4	0	0.0	1,644	10.6	1,875	12.0	0	0.0
1970	20,251	12,684	62.6	398	2.0	2,800	13.8	4,154	20.5	215	1.1
1980	25,867	10,861	42.0	561	2.2	4,515	17.5	9,737	37.6	193	0.7
1990	28,220	11,148	39.5	3,491	12.4	4,050	14.4	9,439	33.4	92	0.3
2000	29,543	11,452	38.8	4,207	14.2	4,063	13.8	9,441	31.9	380	1.3
2015	29,764	11,828	39.7	4,197	14.1	4,055	13.6	9,574	32.2	110*	0.4
2019	30,024	12,266	40.9	4,253	14.2	3,987	13.2	9,334	31.1	184	0.6

\* 2015 data is based on the American Community Survey (ACS), which samples only a small percentage of the population. The reduction in mobile homes is primarily a result of the large sampling errors associated with a small sample of mobile homes.  
Source: Bureau of the Census (1960, 1970, 1980, 1990, and 2000), American Community Survey (2011-2015; 2015-2019).

<sup>2</sup> Single-family attached units are those units that share one common wall with another unit. Such homes may include townhome units in planned unit development. Condominium is a legal form of ownership, not a type of housing structure. Townhomes (i.e. single-family attached units) are a form of condominium.

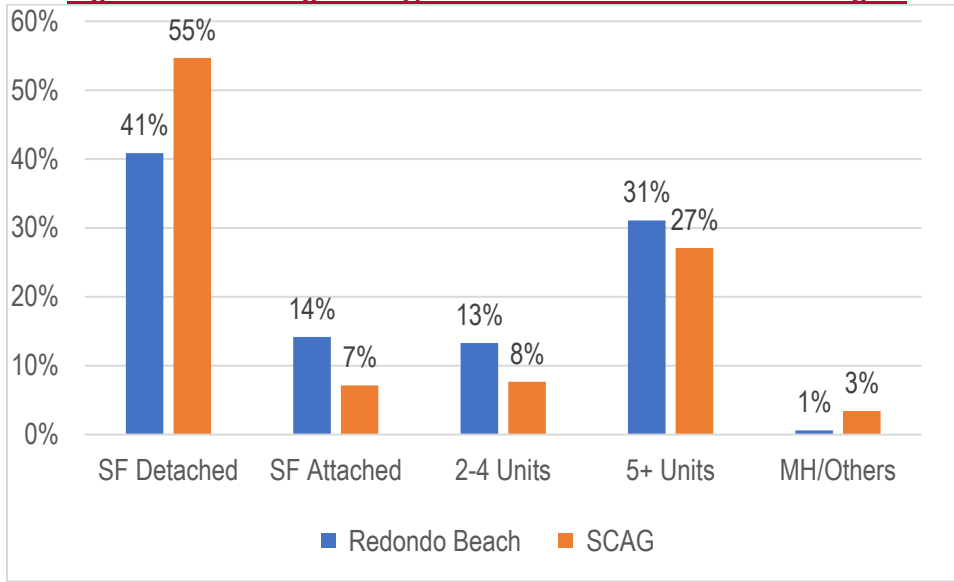
<sup>3</sup> The "Mobile Homes and Other" category includes "Other" housing units as defined in the Census, such as boats, RVs, vans, etc.

**Figure H-1: Residential Zoning – Redondo Beach and Nearby Cities**



Source: City of Redondo Beach

**Figure H-2: Housing Unit Type – Redondo Beach and SCAG Region**



Source: 2015-2019 ACS.



## 2. Housing Tenure

Of the Redondo Beach housing units that were occupied in 2019, 50.5 percent were owner-occupied and 49.5 percent were renter-occupied. The proportion of homeowners in the City was higher in comparison to Los Angeles County as a whole, where 45.8 percent of units were owner-occupied, and 54.2 percent were renter-occupied.

Housing tenure historical trends are shown in [Table H-23](#). The percentage of owner-occupied units declined dramatically from nearly 60 percent in 1960 to less than 40 percent in 1980, a period when most new construction in the City consisted of new apartments. Many developers during the 1970s and 1980s built condominiums/townhomes and offered them for rent until the construction defect litigation statute of limitations expired. Upon expiration, the developers started marketing the condominiums/townhomes as for-sale units. This may explain the low rates of homeownership during the 1970s and its subsequent increase in the decades that followed. However, homeownership in the current housing market may be out of reach to many households, leading to a declined homeownership rate in 2019.

Year	Owner-occupied	Percent	Renter-occupied	Percent	Total
1960	8,578	59.1	5,944	40.9	14,522
1970	8,362	44.5	10,433	55.5	18,795
1980	9,446	38.3	15,191	61.7	24,637
1990	12,390	46.4	14,327	53.6	26,717
2000	14,147	49.5	14,419	50.5	28,566
2010	14,917	51.4	14,094	48.6	29,011
2019	14,363	51.9	13,298	48.1	27,663

Source: Bureau of the Census (1960, 1970, 1980, 1990, 2000, and 2010, ACS 2015-2019).

## 3. Vacancy Rates

The difference between current and optimal vacancy rates provides an indication of existing housing need. According to the Southern California Association of Governments (SCAG), a five percent rental vacancy rate is considered optimal in order to permit adequate rental mobility. In a housing market with lower vacancy rates, rents are likely to be inflated and tenants will have difficulty finding units of the right size and cost. A two percent vacancy rate for owner-occupied housing is considered optimal.

In 2019, 1.1 percent of the homeowner housing stock was available for sale and 4.7 percent of the rental housing stock was available for rent. In addition to vacant units for sale or rent, another 5.2 percent of the housing stock was vacant in 2019 for other reasons, including units for seasonal, recreational, or occasional use, as well as units undergoing extensive remodels, and units rented or sold but not yet occupied. The total for all types of vacant housing units in 2019 was 2,361, representing an overall vacancy rate of 7.9 percent.

Vacancy rates for the period from 1960 to 2019, based on Census numbers and the ACS are shown in [Table H-24](#). As shown, vacancy rates generally declined over the years, reflective of an increasingly tightening housing market; however, overall vacancy rates increased during the 2000s.

Year	Vacant Units for Sale or Rent <sup>1</sup>	Percent	Total Vacant Units <sup>2</sup>	Percent	Total Units
1960	832	5.3	1,057	6.8	15,579
1970	831	4.1	1,456	7.2	20,251
1980	874	3.4	1,230	4.8	25,867
1990	1,111	3.9	1,503	5.3	28,220
2000	637	2.2	977	3.3	29,543
2010	928	3.0	1,598	5.2	30,609
2019	823	2.7	2,361	7.9	30,024

Notes:

- Includes 'For Rent' units (refers to vacant units offered for rent, where no money has been paid or agreed upon by any renter) and 'For Sale Only' units (refers to vacant units being offered for sale only, including units in cooperatives and condominium projects if the individual units are offered for sale only. If units are offered either for rent or for sale, they are included in the for rent classification.)
- 'Total Vacant Units' includes the following categories:
  - For rent
  - Rented, Not Occupied
  - For Sale Only
  - Sold, Not Occupied
  - For Seasonal, Recreational, or Occasional Use
  - For Migrant Workers
  - Other Vacant

Source: Bureau of the Census (1960, 1970, 1980, 1990, 2000, 2010, 2015-2019 ACS).

## 4. Housing Stock Condition

### Age of Structures

The habitability of housing refers to its structural condition and its ability to provide safe and decent shelter for its inhabitants. The accepted standard for major housing rehabilitation needs is after 30 years.

Redondo Beach is known for its quaint, historical charm. Much of the City's housing stock is made up older homes. According to the 2015-2019 ACS, about 66 percent of the City's housing units were more than 40 years old and another 25 percent reaching at least 30 years old during the Housing Element planning period.

While age alone is not an indicator of housing condition, older structures do tend to have greater rehabilitation needs.

Year Unit Built	Number	Percent
1939 or earlier	1,172	4.2
1940 -1959	7,399	26.7
1960 -1979	9,656	34.9
1980 -1999	6,991	25.3
2000 - 2009	1,875	6.8
2010 - 2013	269	1.0
2014 - 2019	301	1.1
Total	27,663	100.0

Source: American Community Survey (2015-2019).

## **Substandard Structures**

The City's Code Enforcement program is reactive to complaints filed. No housing conditions survey was conducted for this Housing Element due to staffing constraints. However, City Code Enforcement Staff estimate that the extent of dilapidated structures and housing units in need of substantial rehabilitation remains relatively unchanged from 2000, the last time the City conducted a detailed housing conditions survey, with only a modest increase to approximately 65 from 50 structures in Redondo Beach noted as dilapidated and to approximately 165 from the 150 dwelling units reported to be in need of substantial rehabilitation.

The City's Code Enforcement Staff estimates complaints concerning dilapidated structures and dwelling units in need of substantial rehabilitation are filed at a rate of approximated 1-3 per month. The City's Code Enforcement Staff notes current trends concerning substandard housing conditions generally evolve from unpermitted conversions of portions of existing structures and older residential units with owners that have aged in place or where the original owners have deceased and left their properties to children or grandchildren and the residences are either vacant for extended periods or converted to rental properties with minimal maintenance. With limited funding, the City currently offers a Mobility Access and Emergency Repairs program to assist with housing conditions issues. In addition, the Housing Plan includes an action to pursue funding from the State to provide for rehabilitation assistance.

In 1992, the Redondo Beach City Council also acted to endorse the approval of Mills Act contracts with owners of locally-designated historic properties. The Mills Act is a state tax incentive law that allows cities to enter into contracts with the owners of historic structures. This contract provides a method of reducing property taxes in exchange for the continued preservation of the property. Property taxes recalculated using the special Mills Act assessment method can be reduced 50 percent or more.

## **5. Cost of Housing and Affordability**

Housing affordability can be inferred by comparing the cost of renting or owning a home in Redondo Beach with the maximum affordable housing costs to households which earn different income levels. Taken together, this information can provide a picture of who can afford what size and type of housing as well as indicate the type of households that would likely experience overcrowding or overpayment.

### **Ownership Housing**

In 2020, the median sales price for a single-family home in Redondo Beach was \$1,160,000. In 2021 this rose to \$1,316,500, a 13.5 percent increase. While the median sales prices of homes in Redondo Beach were higher than that of neighboring Torrance, prices remained significantly lower than those in nearby Hermosa Beach, Manhattan Beach, and Rancho Palos Verdes. Overall, median sales prices for homes in the South Bay region were far higher than the median sales price for homes in Los Angeles County as a whole.

	<b># of Sales</b>	<b>2021 Median Sales Price \$</b>	<b>2020 Median Sales Price \$</b>	<b>% Change</b>
Redondo Beach	104	1,316,500	1,160,000	13.5
Torrance	156	946,000	756,000	25.1
Hermosa Beach	29	1,965,000	1,346,591	45.9
Manhattan Beach	47	2,795,000	2,349,500	19.0
Rancho Palos Verdes	57	1,420,000	1,265,000	12.3
Los Angeles County	7,974	750,000	640,000	17.2
Source: Core Logic, March 2021				

### **Cost of Rental Housing**

In May 2021, 30 units were listed for rent in the City of Redondo Beach. Rents for these housing units ranged from \$1,495 (for a one-bedroom apartment) to \$6,500 (for a four- bedroom rental). It should be noted that these rent ranges are based on the City’s vacant rental units only and not all rental units in general. This rent survey was an attempt to approximate the cost of rental housing in the City. [Table H-27](#) shows the detailed breakdown of Redondo Beach rental units by number of bedrooms. The median rent levels in Redondo Beach ranged from \$2,300 for a one-bedroom apartment to \$5,300 for a housing unit with four or more bedrooms.

<b>Bedroom</b>	<b>Number Listed</b>	<b>Median Rent</b>	<b>Average Rent</b>	<b>Rent Range</b>
Studio	-	-	-	-
1	9	\$2,300	\$2,202	\$1,495 - \$2,950
2	14	\$2,223	\$2,243	\$1,800 - \$2,935
3	4	\$3,600	\$3,572	\$2,795 - \$4,295
4+	3	\$5,300	\$5,550	\$4,850 - \$6500
Total	30	\$2,950	\$3,392	\$1,495 - \$6,500
Source: Craigslist.com, Accessed (May 2021)				

### **Housing Affordability**

[Table H-28](#) shows the annual income for extremely low, very low, low, and moderate-income households by the size of the household and the maximum affordable housing payments based on the federal standard of 30 percent of household income. From these income and housing cost limits, the maximum affordable home prices and rents are determined. These figures are estimates only and presented for the purpose of demonstrating the significant gaps between market rents/home prices and affordability levels. Based on the rents and home prices shown earlier, lower income households cannot afford housing in Redondo Beach. Moderate income households (with five or more members) at the high end of the income range may be able to afford small rental units in the City only.

<b>Table H-28: Housing Affordability Matrix (2020)</b>						
Household	Annual Income <sup>1</sup>	Affordable Costs (All Costs)	Estimated Utility Allowance, Taxes & Insurance <sup>2</sup>		Affordable Rent	Affordable Home Price
			Utilities	Taxes, Ins., HOA (Ownership)		
<b>Extremely Low-Income (0-30% AMI)</b>						
1-Person	\$23,700	\$593	\$151	\$207	\$442	\$61,790
2-Person	\$27,050	\$676	\$166	\$237	\$510	\$72,096
3-Person	\$30,450	\$761	\$190	\$266	\$571	\$80,244
4-Person	\$33,800	\$845	\$223	\$296	\$622	\$86,069
5-Person	\$36,550	\$914	\$264	\$320	\$650	\$86,953
<b>Very Low Income (31-50% AMI)</b>						
1-Person	\$39,450	\$986	\$151	\$345	\$836	\$129,241
2-Person	\$45,050	\$1,126	\$166	\$394	\$960	\$149,182
3-Person	\$50,700	\$1,268	\$190	\$444	\$1,077	\$166,966
4-Person	\$56,300	\$1,408	\$223	\$493	\$1,185	\$182,427
5-Person	\$60,850	\$1,521	\$264	\$532	\$1,257	\$191,020
<b>Low Income (51-80% AMI)</b>						
1-Person	\$63,100	\$1,578	\$151	\$552	\$1,427	\$230,524
2-Person	\$72,100	\$1,803	\$166	\$631	\$1,637	\$265,026
3-Person	\$81,100	\$2,028	\$190	\$710	\$1,837	\$297,157
4-Person	\$90,100	\$2,253	\$223	\$788	\$2,030	\$327,179
5-Person	\$97,350	\$2,434	\$264	\$852	\$2,170	\$347,334
<b>Moderate Income (80-120% AMI)</b>						
1-Person	\$64,900	\$1,623	\$151	\$568	\$1,472	\$238,233
2-Person	\$74,200	\$1,855	\$166	\$649	\$1,689	\$274,020
3-Person	\$83,500	\$2,088	\$190	\$731	\$1,897	\$307,435
4-Person	\$92,750	\$2,319	\$223	\$812	\$2,096	\$338,527
5-Person	\$100,150	\$2,504	\$264	\$876	\$2,240	\$359,325
<p>Assumptions: 2020 income limits; 30% of household income spent on housing; LACDA utility allowance; 35% of monthly affordable cost for taxes and insurance; 10% down payment; and 3% interest rate for a 30-year fixed-rate mortgage loan. Taxes and insurance apply to owner costs only; renters do not usually pay taxes or insurance.</p> <p>Sources: California Department of Housing and Community Development 2020 Income Limits; Los Angeles County Development Authority (LACDA), 2020 Utility Allowance Schedule; Veronica Tam &amp; Associates, 2020.</p>						

## 6. Inventory of Affordable Housing

There are three publicly assisted affordable rental housing projects in Redondo Beach. These assisted developments serve the senior population with a total capacity of 333 units, of which 203 are deed restricted for lower income use. [Table H-29](#) provides a summary of all the current and pending affordable housing projects in the City. In addition to these rental housing projects, the City has also created affordable ownership housing as part of its inclusionary housing requirement within the Coastal Zone.

Project	Type	Affordable Units	Total Units	Program	Year Built	Earliest Conversion Date
Casa de Los Amigos 123 S. Catalina Avenue	Senior Apartments	Low (60% AMI): 133	Total: 136	LIHTC	PIS 2008 (Acquired/ Rehabbed)	2038
Seasons Senior Apartments 109 S. Francisca Ave.	Senior Apartments	Very Low: 30	Total: 150	Bond	1995	2025
Seaside Villa 319 N. Broadway Redondo Beach, CA 90277	Senior Apartments	Very Low: 40	Total: 47	Section 8	1980	July 2024
Total Units		203	333			
PIS = Placed in Service; LIHTC = Low Income Housing Tax Credits Sources: HUD Multifamily Assistance and Section 8 Contracts database, 2021; California Housing Partnership, 2021.						

### Assisted Housing Units at Risk

California Government Code Section 65583(a)(8) requires the Housing Element to include an analysis of existing assisted housing developments that are “at risk” (eligible to change from low-income housing to market-rate housing for the ten years from 2021-2031 due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use). Assisted housing developments are defined as multi-family rental housing that receive government assistance under federal programs listed in Government Code Section 65863.10(a) (such as Section 8/HUD), state and local multifamily revenue bond programs, local redevelopment programs, the federal Community Planning and Development funds, or local in-lieu fees. Assisted housing also includes multifamily rental units developed pursuant to a local inclusionary housing program or used to qualify for a density bonus.

Of the assisted housing developments listed in [Table H-29](#), two include units that are “at risk” of converting to market rents during 2021-2031. A total of 70 units at these two projects are at risk of converting to market rate housing during this analysis period.

Seaside Villa is “at risk” due to the need to renew Section 8 contracts periodically and the owner may opt out of the program. Seaside Villa, under the Section 8 program, is receiving rents that are at 131 percent HUD’s Fair Market Rent level, according to HUD’s database. Therefore, the project is not likely to opt out of the Section 8 program.

Seasons Senior Apartments was funded with a multi-family housing revenue bond and includes only 20 percent of the units as affordable. The affordability restriction for Seasons Senior

Apartments is due to expire in 2025. Bond-funded projects are typically more at risk of converting to market rate as the projects are owned by for-profit owners and only 20 percent of the units are deed restricted with no ongoing subsidies such as Section 8. Once the 20 percent of the units become eligible for converting to market rate, it usually does unless financial incentives are available to entice the project owner to maintain these units as affordable.

### **Cost Analysis**

Preservation of the at-risk units can be achieved in several ways: 1) facilitate transfer of ownership of these projects to or purchase of similar units by nonprofit organizations; 2) purchase of affordability covenant; and 3) provide rental assistance to tenants using funding sources other than Section 8.

**Transfer of Ownership:** Long-term affordability of the units at risk can be secured by transferring ownership of these projects to non-profit housing organizations. A search on LoopNet shows several rental properties for sale, averaging about \$450,000 per unit. The at-risk units are smaller and older units and therefore likely to command lower market prices. Nevertheless transferring ownership or purchasing replacement units would require significant resources.

**Purchase of Affordability Covenant:** Another option to preserve the affordability of at-risk projects is to provide an incentive package to the owners to maintain the project as low-income housing. Incentives could include writing down the interest rate on the remaining loan balance, and/or supplementing the Section 8 subsidy amount received to market levels. The feasibility of this option depends on whether the property is highly leveraged. By providing lump sum financial incentives or ongoing subsidies in rents or reduced mortgage interest rates to the owner, the City can ensure that some or all of the units remain affordable.

**Rent Subsidy:** Tenant-based rent subsidies could be used to preserve the affordability of housing. Similar to Section 8 vouchers, the City through a variety of potential funding sources could provide assistance to very low income households. The level of the subsidy required to preserve the at-risk affordable housing is estimated to equal the Fair Market Rent for a unit minus the housing cost affordable by a very low income household. [Table H-30](#) shows the rent subsidies required for the both of the projects with at-risk units. As shown, subsidizing the very low income at-risk units would require approximately \$541,800 annually, an average of \$645 per unit per month.

Table H-30: Rent Subsidies Required						
Unit Size/Household Size	Number of Units	Fair Market Rent <sup>1</sup>	Household Annual Income	Affordable Housing Cost <sup>3</sup>	Monthly per Unit Subsidy <sup>4</sup>	Total Annual Subsidy
Very Low Income (50% AMI) <sup>2</sup>						
1 Bedroom/ 2-person household	70	\$1,605	\$45,050	\$960	\$645	\$45,150
Source: Veronica Tam and Associates, 2021.						
Notes:						
1. Fair Market Rent (FMR) is determined by HUD. These calculations use the 2021 HUD FMR for the Los Angeles-Long Beach-Glendale Metropolitan Area.						
2. Rents are restricted to 50% AMI, which puts residents in the Very Low Income Category, set by the California Department of Housing and Community Development (HCD).						
3. The affordable housing cost is calculated based on 30% of the AMI, minus utilities for rentals.						
4. The monthly subsidy covers the gap between the FMR and the affordable housing cost						

**Replacement Housing Cost:** The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs, and type of construction. Assuming an average development cost of \$500,000 per unit for multifamily rental housing, replacement of the 70 at-risk units would require approximately \$35million.

### **Resources for Preservation of at-Risk Units**

A variety of potential funding sources are available for the acquisition, replacement, or rent subsidies necessary for the preservation of at-risk units; however, due to the high costs of developing and preserving at-risk housing relative to the amount of available local funds, multi-layering of local and non-local sources may be required. A more thorough description of resources for the preservation of at-risk units is presented in the Housing Resources section.

## **7. Coastal Zone Housing**

The Coastal Zone in Redondo Beach includes all land west of Pacific Coast Highway. California Government Code Section 65588(c) requires each periodic revision of the Housing Element to include the following information relating to housing in the Coastal Zone: a) the number of new housing units approved for construction within the coastal zone since January 1, 1982; b) the number of housing units for persons and families of low or moderate income required to be provided in new housing developments either within the coastal zone or within three miles of the coastal zone as a replacement for the conversion or demolition of existing coastal units occupied by low or moderate income persons; c) the number of existing residential units occupied by persons and families of low or moderate income that have been authorized to be demolished or converted since January 1, 1982 in the coastal zone; and d) the number of residential units for persons and families of low or moderate income that have been required for replacement units.

Since January 1, 1982 a total of 860 new housing units have been constructed and 461 units have been demolished, for a net gain of 399 units ([Table H-31](#)). Since the last Housing Element revision (2013), there have been 98 units constructed and 96 units demolished for a net increase of two units. The new construction included mostly condominium developments. The majority of the units involved are not subject to the replacement requirements. The City requires



affordable housing units in targeted revitalization zones, such as Ruxton Lane. A minimum of 10 percent of the units developed in the Coastal Zone must also be affordable, in accordance with the Mello Act.

<b>Table H-31: Coastal Zone Development (1982-2020)</b>			
<b>Year</b>	<b>Units Constructed</b>	<b>Units Demolished</b>	<b>Net Gain</b>
1982-1992	484	205	279
1993-2002	163	84	79
2003-2012	115	76	39
2013	0	0	0
2014	32	43	-11
2015	17	11	6
2016	19	14	5
2017	9	7	2
2018	13	18	-5
2019	6	2	4
2020	2	1	1
<b>Total</b>	<b>860</b>	<b>461</b>	<b>399</b>
Source: City of Redondo Beach, 2021			

### 2.2.3 Constraints on Housing Production

Housing Element law requires an analysis of both governmental and nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels.

#### A. Governmental Constraints

Government housing regulations are necessary to ensure that housing is constructed and maintained in a safe manner, to assure that the density and design of housing is consistent with community standards, and to facilitate the provision of adequate infrastructure to support new housing. Nonetheless, government regulations (including local Measure DD) can potentially have an inhibiting or constraining effect on housing development. This can be particularly true for affordable housing, which must be developed in a cost-efficient manner.

The City of Redondo Beach has not adopted regulations that are specifically intended to control the rate or amount of housing development that may occur (i.e., growth control measures). On a comparative basis, City fees, procedures, and requirements related to housing development in Redondo Beach are comparable to other cities in the region and therefore are not excessive or highly restrictive.

The City complies with the Government Transparency bill. Planning and development regulations, including the General Plan, Zoning Ordinance, fee schedules, and other information that facilitates the development and improvement of properties in the City is available online.

#### 1. Land Use Controls

The General Plan Land Use Element and Zoning Ordinance establish locations and allowable densities for housing development within the City. The General Plan policies aim to preserve existing single-family and low-density multiple-family neighborhoods while providing additional capacity for growth. The City's General Plan land use policies help accomplish several objectives:

- Providing reasonable opportunities to accommodate new multiple-family housing;
- Providing opportunities for new types of housing (such as in mixed use developments) to serve broader segments of the housing market;
- Establishing selected areas for increased residential densities to enhance the affordability and range of housing opportunities available; and
- Maintaining the basic character and scale of existing residential neighborhoods.

The City is currently updating its General Plan, including the Land Use Element. A Preferred Land Use Plan has been approved by the City Council in May 2021. This Housing Element is consistent with the Preferred Land Use Plan, anticipated to be adopted by November 2022. [Table H-32](#) below provides a comparison between the current and proposed General Plan land use designations. The [numerous](#) Residential Overlays are new land use designations created by the Preferred Land Use Plan to provide additional housing opportunities in various parts of the City. Standalone residential uses are permitted in these Overlays. Other land use designations involve

only minor adjustments (MU-1 reduced from 35 du/ac to 30 du/ac and RH increased from 28 du/ac to 30 du/ac). Specifically, the Mixed Use properties are not rezoned but reclassified, combining three MU designations into two, combining parcels currently zoned MU-1 and MU-2 into the new MU-1 and relabeling the parcels currently zoned MU-3 as MU-2. MU designations do not allow standalone residential development. However, the development standards are established to provide significant incentives for mixed use development over commercial only development. For example, height limit for mixed use development can reach 45 feet (three stories). Commercial only development has a maximum FAR of 0.50, but can reach 1.50 for mixed use development. Existing standards apply until the Preferred Land Use Plan is approved by the electorate.

<b>Table H-32: General Plan Land Use Designations – Current and Proposed</b>		
	<b>Current General Plan</b>	<b>Proposed General Plan</b>
<b>Single-Family Residential</b>		
R-1	8.8 du/ac	8.8 du/ac
R-1-A	17.5 du/ac	17.5 du/ac
<b>Multi-Family Residential</b>		
R-2	14.6 du/ac	14.6 du/ac
R-3	17.5 du/ac	17.5 du/ac
RMD	23.3 du/ac	23.3 du/ac
RH	28.0 du/ac	30.0 du/ac
<b>Mixed Use</b>		
Mixed Use Transit Center	---	FAR 1.5 30 du/ac
MU-1	Commercial Only: 0.35 FAR Mixed Use: FAR 1.5 up to 35 du/ac	MU-1 Commercial Only: 0.35-0.50 FAR Mixed Use: FAR 1.5 up to 30 du/ac (All density exceeding 0.70 must be residential units)
MU-2	Commercial Only: 0.50 FAR Mixed Use: FAR 1.5 up to 35 du/ac	MU-2 Commercial Only: 1.00 FAR Mixed Use: FAR 1.5 up to 35 du/ac (All density exceeding 0.70 must be residential units)
MU-3	Commercial Only: 1.00 FAR Mixed Use: FAR 1.5 up to 35 du/ac	
<b>Residential Overlay</b>		
North Tech District	---	<u>55</u> du/ac
Kingsdale North	---	<u>55</u> du/ac
South of Transit Center	---	<u>55</u> du/ac
<u>South Bay Marketplace</u>	---	<u>55</u> du/ac
190 <sup>th</sup> Street	---	<u>55</u> du/ac
<u>FedEx</u>	---	<u>55</u> du/ac

## Specific Plans

In addition to the General Plan designations described above, the City has adopted a specific plan that has a significant residential component.

### **Redondo Beach Harbor/Civic Center Specific Plan**

The Harbor/Civic Center Specific Plan area includes approximately 355.4 acres of land (representing approximately nine percent of the City's total land area). It is located in the northwest portion of South Redondo Beach, roughly bounded by Herondo Street (to the north), the rear of lots containing existing commercial uses fronting onto Pacific Coast Highway (to the east), Pearl Street (to the south), and the breakwater structure extending out into Santa Monica Bay and the Pacific Ocean to the west. The Specific Plan allows for residential densities of up to 17.5 units per acre in Zone 3 (an area bounded by Juanita, PCH, and Agate), and up to 28 units per acre in Zone 4 (an area bounded by PCH and Broadway to the north and south, and Vincent and Garnet to the west and east). Zone 4 of the Specific Plan area will be amended following the formal adoption of the preferred land use plan to reflect the increased residential density from 28 units per acre to 30 units per acre.

## Density Bonus

The City's density bonus ordinance was last updated in 2014. The City will amend the Zoning Ordinance to be consistent with the recent changes to the State Density Bonus law, including but not limited to:

- AB 1763 (Density Bonus for 100 Percent Affordable Housing) – Density bonus and increased incentives for 100 percent affordable housing projects for lower income households.
- SB 1227 (Density Bonus for Student Housing) - Density bonus for student housing development for students enrolled at a full-time college, and to establish prioritization for students experiencing homelessness.
- AB 2345 (Increase Maximum Allowable Density) - Revised the requirements for receiving concessions and incentives, and the maximum density bonus provided.

## 2. Residential Development Standards

Citywide, outside the specific plan areas, the City regulates the type, location, density, and scale of residential development primarily through the Zoning Ordinance. The following zoning districts allow residential uses:

R-1 and R-1A (single-family residential zones) – The purpose of these zones is to provide residential areas to be developed exclusively for single-family dwellings.

R-2, R-3 and R-3A (low density multiple-family residential zones) – The purpose of these zones is to provide opportunities for low density multi-family residential land use, including attached or detached units in condominiums, duplexes, and

apartments designed to convey the visual character of single family residential neighborhoods.

RMD (medium density multiple-family residential zone) – The purpose of this zone is to provide opportunities for medium density multi-family residential land use, including attached or detached units in condominiums, duplexes, and apartments, with standards appropriate for such development and designed to convey a distinctive residential neighborhood quality.

RH-1, RH-2, and RH-3 (high density multiple-family residential zones) – The purpose of these zones is to provide opportunities for higher density multi-family residential land use, including apartments and condominiums, with standards appropriate for such development and designed to convey a distinctive residential neighborhood quality.

MU-1, MU-2, and MU-3 (mixed-use zones) – The purpose of these zones is to encourage residential uses in conjunction with commercial activities in order to create an active street life, enhance the vitality of businesses, and reduce vehicular traffic.

The Zoning Ordinance also establishes development standards for housing, as summarized in [Table H-33](#) and [Table H-34](#). These standards represent that current development standards that will continue to apply until the Zoning Ordinance is updated (by October 2024) to implement the updated General Plan. In general, these standards are not considered to be excessive. The Zoning Ordinance includes specific development standards for condominiums, including standards for open space, noise and vibration transmission, storage, parking, and utility hook-ups. While these standards may affect development costs, they are considered necessary to assure certain quality standards for multiple-family for-purchase housing. The Zoning Ordinance will be updated to implement the new General Plan. This update will be completed within three years and 120 days from the October 15, 2021, statutory deadline of the Housing Element in order to meet the City’s obligations for accommodating additional housing in the community.

<b>Table H-33: Summary of Residential Development Standards</b>						
	<b>R-1 (Single Family)</b>	<b>R-1A (Single Family)</b>	<b>R-2 (Low Density Multiple-Family)</b>	<b>R-3A (Low Density Multiple-Family)</b>	<b>RMD (Medium Density Multiple-Family)</b>	<b>RH<sup>1</sup> (High Density Multiple-Family)</b>
<b>Density</b>	8.8 du/acre	17.5 du/acre	14.6 du/acre	17.5 du/acre	23.3 du/acre	28 du/acre
<b>Front setback</b>	Average of 25% of depth of lot, max. 25 ft., min. 20 ft.	25 ft. first story, 20 ft. second story	Average of 20 ft., min. 15 ft.	Average of 18 ft., min. 14 ft.	Average of 18 ft., min. 12 ft.	Average of 15 ft., min. 12 ft.
<b>Side setback</b>	5 ft.	3 ft.	5 ft.	5 ft.	5 ft. 6 ft. for lots > 50 ft. and < 100 ft. in width. 10 ft. for lots > 100 ft. and < 150 ft. in width. 15 ft. for lots > 150 ft. in width.	5 ft. 6 ft. for lots > 50 ft. and < 100 ft. in width. 10 ft. for lots > 100 ft. and < 150 ft. in width. 15 ft. for lots > 150 ft. in width.
<b>Rear Setback</b>	Average of 20% of depth of lot, min. 15 ft.	Average of 16 ft., min. 10 ft.	Average of 15 ft., min. 10 ft.	Average of 15 ft., min. 10 ft.	Average of 15 ft., min. 10 ft.	Average of 15 ft., min. 10 ft.
<b>Height</b>	30 ft.	30 ft.	30 ft.	30 ft.	30 ft.	30 ft. (RH-1); 35 ft. (RH-2, RH-3 <sup>2</sup> )
<b>Stories</b>	2	2	2	2	2	2 (RH-1); 3 (RH-2, RH-3)
<b>Outdoor Living Space</b>	Min. 800 sq. ft.	Min. 400 sq. ft.	Condos: 450 sq. ft. per unit; Other multiple-family: 400 sq. ft. per unit	350 sq. ft. per unit	350 sq. ft. per unit	200 sq. ft. per unit
<b>Parking</b>	2 enclosed	2 enclosed	2 (both enclosed for condos; at least one enclosed for other multiple-family)			
<b>Visitor parking</b>	--	--	Applicable to lots with at least 50 ft. of lot width: 2-3 units: 1 space; 4-6 units: 2 spaces; 7-10 units: 3 spaces; 11+ units: 1 space per each 3 units			
Note: 1. Includes RH-1, RH-2, and RH-3 2. Height limit can be increased to 45 feet, 3 stories for affordable housing. Source: Redondo Beach Municipal Code (2021).						

To facilitate larger multi-family housing development (11+ units), the City has reduced its visitor parking requirement from one space per two units to one space per three units. The City also offers reduced parking standards for senior housing projects. Senior citizen housing developments are only required to provide a minimum of one covered space per one-bedroom unit and one covered space plus 0.5 covered or uncovered spaces per two-bedroom unit. One visitor space for every five units is also required. Total parking requirements for a senior citizen housing development may be reduced by a maximum of 0.2 spaces per unit if the units are restricted for low or moderate income households. Additionally tandem parking configurations are permitted for senior housing projects which allows for greater design flexibility.

In 2011, the City amended the mixed use development standards to ensure adjacent residential uses are not adversely impacted by commercial development. These standards are intended to enhance community acceptance of mixed use development.

<b>Table H-34: Residential Development Standards in MU Zones</b>				
	<b>MU-1</b>	<b>MU-2</b>	<b>MU-3</b>	<b>MU-3A/MU-3B/ MU-3C</b>
Floor Area Ratio (FAR)	1.5	1.5	1.5	1.5
Density	35 du/ac	35 du/ac	35 du/ac	35 du/ac
Minimum Lot Size	15,000 sq. ft.	15,000 sq. ft.	15,000 sq. ft.	15,000 sq. ft.
Front setback	15 ft.	15 ft.	10 ft.	10 ft. <sup>3</sup> /3 ft. <sup>3</sup>
Side setback	10 ft.	10 ft.	10 ft. <sup>2</sup>	10 ft. <sup>2</sup>
Rear Setback	10 ft.	10 ft.	0 ft. <sup>2</sup>	0 ft. <sup>2</sup>
Height	38 ft. <sup>1</sup>	38 ft. <sup>1</sup>	38 ft. <sup>1</sup>	38 ft. <sup>1</sup>
Stories	3	3	3	2 (MU-3A); 3(MU-3B; MU-3C)
Outdoor Living Space	200 sq. ft.	200 sq. ft.	200 sq. ft.	200 sq. ft.
Parking	2 (one space per dwelling unit shall be within an enclosed private or common parking garage)			
Visitor parking <sup>4</sup>	2-3 units: 1 space; 4-6 units: 2 spaces; 7-10 units: 3 spaces; 11+ units: 1 space per each 3 units			
Notes:				
1. The height limit for MU-3A for commercial uses only is 30 feet. For residential uses, the height /story restrictions are up to 45 feet and 3 stories.				
2. A setback of 20 feet is required when the lot line is contiguous to a residential zone.				
3. When a lot is contiguous to a residentially zoned lot fronting the same street, the required set back will be the same as for the contiguous residential lot.				
4. Additional visitor parking spaces may be required if determined to be necessary due to unique characteristics of the project and/or surrounding neighborhood.				
Source: Redondo Beach Municipal Code (2021).				

### 3. Building Codes

Building codes establish minimum standards for construction, which are essential for ensuring protection of the public health, safety and welfare. All building construction in Redondo Beach is subject to the requirements of Title 9 of the Redondo Beach Municipal Code. Under Title 9, the City adopted the California Building Code (2019) along with several local amendments. Local amendments to the California Building Code include:

- Annual Fire Alarm Maintenance, Inspection, and Testing;
- Automatic Fire Sprinkler System required with equipped Weatherproof Horn/Strobe;
- Roof Coverings (Fire Retardant Roof Coverings required);
- Construction Noise (Construction restricted to daylight hours on weekdays and Saturdays);
- Stormwater and Urban Runoff Pollution Control; and
- Undergrounding of Utilities

Although compliance with the City’s building codes increases the cost of housing production and could therefore constrain the provision of new housing, these ordinances have been adopted by the City of Redondo Beach for health and fire safety reasons (undergrounding utilities, fire sprinkling), or were required by local conditions (fire-resistant roofing in areas of few fire stations) or federal mandates (flood hazards, NPDES). Code enforcement in the City is largely complaint driven.

#### **4. Provision for a Variety of Housing Types**

Redondo Beach has every level and type of housing; singles, 1 bedroom, 2 bedrooms, 3 bedrooms, including multi-family housing and single-family housing, as well as affordable housing up to multi-million dollar coastal homes. Fifty-percent of the housing units in the community is rental. The City also has a Housing Authority with over 500 vouchers issued for Section 8 housing. There are numerous senior living complexes in all areas of town, as well as assisted living and group facilities. And Redondo Beach is addressing housing those experiencing homelessness, with the existing pallet shelter facilities near the transit center and the proposed project homekey project expected to be operational in the southern area of the City near many of the private and public services for those experiencing homelessness.

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of types of housing for all income levels, including multiple-family rental housing, factory-built housing, mobile homes, emergency shelters, transitional housing, supportive housing, and farmworker housing. [Table H-35](#) summarizes the City’s current zoning provisions for various types of housing. The Preferred Land Use Plan maintains the existing residential land use patterns in the majority of the City, except for [the](#) new Residential Overlays. Housing types allowed in the various zones will not change from the current General Plan to the updated General Plan.



**Table H-35: Provision for a Variety of Housing Types**

	R-1 (Single Family)	R-1A (Single Family)	R-2 (Low Density Multiple-Family)	R-3 (Low Density Multiple-Family)	RMD (Medium Density Multiple-Family)	RH <sup>1</sup> (High Density Multiple-Family)	R-MHP (Mobile Home Park Zone)	P-CF (Community Facility)
Single-Family	P	P	P	P	P	P	--	--
Multi-Family (2-3 units on a lot)	--	--	P	P	P	P	--	--
Multi-Family (4+ units on a lot)	--	--	C	C	C	C	--	--
Condominiums (2-3 units)	--	--	A	A	A	A	--	--
Condominiums (4+ units)	--	--	C	C	C	C	--	--
Mobile Homes	--	--	--	--	--	--	P	--
Accessory Dwelling Units/Junior ADUs	P	P	P	P	P	P	--	--
Residential Care Facilities, limited (6 or fewer)	P	P	P	P	P	P	--	C
Residential Care Facilities, general (7 or more)	--	--	--	--	--	--	--	C
Senior Housing	--	--	--	C	C	C	--	

P = Permitted; A = Administrative Design Review required; C = Conditionally Permitted; -- = Not Permitted  
 Note:  
 1. RH-1, RH-2 and RH-3 included.  
 Source: Redondo Beach Municipal Code (2021).

**Table H-36: Permitted Uses in MU zones**

	MU-1	MU-2	MU-3	MU-3A/MU-3B/MU-3C
Multi-Family Residential*	C	C	C	C
Condominiums	C	C	C	C
Family day care home, small	P	P	P	P
Family day care home, large	P	P	P	P
Residential care, limited	P	P	P	P
Senior Housing	C	C	C	C

\* Allowed only as part of a mixed use development and residential units may only be located on the second floor and higher of structures with commercial uses on lower levels, except in the MU-2 zone, with the following exceptions:

- MU-1 zone: lots may be developed exclusively for residential use where the entirety of the block frontage is developed exclusively for residential use.
- MU-2 zone: lots may be developed exclusively for residential use.
- MU-3A zone: residential dwelling units may be located on any floor in structures located behind street-facing commercial or mixed-use structures or above parking on the ground floor in structures located behind street-facing commercial or mixed-use structures.

Source: Redondo Beach Municipal Code (2021).

## **Single-Family**

Single-family residences are permitted in all residential zones in the City except the Mobile Home Park and Mixed-Use zones. Residential development in Redondo Beach has primarily occurred on multi-family (R2 and R3) zones where existing uses are single-family homes. As discussed in the Housing Resources section, residential recycling has been active. Between 2017 and 2020, 100 R2 and R3 properties with existing single-family homes have recycled into higher density multi-family uses. Given the high price of housing in Redondo Beach, allowing single-family homes in all residential zones is not a constraint to multi-family development. In fact, the Preferred Land Use Plan proposes to redesignate the Kingsdale neighborhood from single-family (R1) use to multi-family (RH) use, in recognition of the recycling trend.

## **Multiple-Family**

Smaller multiple-family housing developments (two to three units per lot) are subject to administrative approvals, Administrative Design Review (ADR) and if proposed as a Condominium subdivision a Tentative Parcel Map, in all multi-family zones. The City has established a streamlined administrative process for these projects that eliminates the requirement for a hearing before the Planning Commission and grants the Community Development Director authority to approve these smaller projects. Multiple-family residential developments with four or more units on a single lot are conditionally permitted in all residential zones, and require the issuance of a Planning Commission Design Review (PCDR) entitlement, along with a CUP, and if proposed as a Condominium subdivision a Tentative Parcel/Tract Map. The PCDR and CUP for these projects is considered by the Planning Commission. The CUP, ADR, and PCDR findings for both small and larger multiple family projects are typical in their purview and seek to balance the need for housing with protections to ensure safety and general welfare of the planned new development with the existing surrounding neighborhood. Typical conditions include:

### **Plan Check:**

1. The precise architectural treatment of the building exterior, roof, walks, walls, and driveways shall be subject to Planning Department approval prior to issuance of a building permit.
2. The applicant shall submit a landscape and sprinkler plan, including a clock-operated sprinkler control, for approval prior to issuance of building permits.
3. If the selected design of the water and/or heating system permits, individual water shut-off valves shall be installed for each unit, subject to Planning Department approval.
4. The garage doors shall be equipped with remotely operated automatic door openers and maintain a minimum vertical clearance of 7-feet, 4-inches with the door in the open position.
5. No plastic drain pipes shall be utilized in common walls or ceilings.
6. Color and material samples shall be submitted for review and approval of the Planning Department prior to the issuance of Building Permits.

7. An acoustical analysis is required at time of plan check submittal showing that the proposed design will limit external noise (site is located where the Ldn or CNEL exceeds 60 db).
8. Survey, soil report, structural calculations, and energy report will be required at the time of plan check submittal.
9. The applicants and/or their successors shall maintain the subject property in a clean, safe, and attractive state until construction commences.

**Construction:**

10. The applicant shall provide on-site erosion protection for the storm drainage system during construction, to the satisfaction of the Engineering Department.
11. Barriers shall be erected to protect the public where streets and/or sidewalks are damaged or removed.
12. The Planning Department shall be authorized to approve minor changes.
13. A new 6-foot decorative masonry wall or a six-foot high mixed construction wall shall be constructed on all common property lines with adjacent properties, exclusive of the front setback. Mixed construction walls shall consist of a masonry base and masonry pilasters, which shall be composed of at least 30 percent masonry and 70 percent wood. Projects may only utilize existing property line walls when the walls are 6-foot masonry or mixed construction, exclusive of the front setback.
14. The applicant shall finish all new property line walls equally on both sides wherever possible. Projects utilizing existing property line walls shall restore the walls to an “as new condition,” on both sides, subject to Planning Department approval.
15. The site shall be fully fenced prior to the start of construction.
16. All on-site litter and debris shall be collected daily.
17. Construction work shall occur only between the hours of 7 a.m. and 6 p.m. on Monday through Friday, between 9 a.m. and 5 p.m. on Saturday, with no work occurring on Sunday and holidays.
18. Material storage on public streets shall not exceed 48-hours per load.
19. The project developer and/or general contractor shall be responsible for counseling and supervising all subcontractors and workers to ensure that neighbors are not subjected to excessive noise, disorderly behavior, or abusive language.
20. Streets and sidewalks adjacent to job sites shall be clean and free of debris.

**Final Inspection:**

21. The landscaping and sprinklers shall be installed per the approved plan, prior to final inspection.
22. Fire protection system shall be equipped with an alarm initiating device and an outside horn/strobe located at the front of the building and/or as near as possible to the front.

Horn/strobe shall not be obstructed from front of residence view by down spouts, gutters, trim or mullions, etc.

23. The sidewalk, curb, and gutter shall be replaced, as necessary, to the satisfaction of the Engineering Department.
24. The Vesting Parcel Map shall be recorded within 36-months of the effective date of this approval, unless an extension granted pursuant to law. If said map is not recorded within said 36-month period, or any extension thereof, the map shall be null, void, and of no force and effect.
25. The developer shall plant a minimum 36-inch box tree within the front-yard of the project, subject to Planning Department approval (not a palm tree).
26. Any future exterior or interior alterations shall require the approval of the Home Owner's Association and the Planning Department.

The City has rarely, if ever, rejected a CUP application for a multiple family development and therefore does not consider the CUP requirement a constraint for development. The CUP, in combination with the PCDR entitlement requirement and Tentative Parcel/Tract Map, adds a public hearing to the review/approval process for larger projects. However, overall project approval can occur within two to three months (see [Table H-39: Processing Times](#) presented later). This timeframe does not have a significant cost impact on the overall development. Additionally, the City allows for concurrent processing of the building permit plan check during the entitlement review process under certain circumstances.

## **Condominiums**

Pursuant to the City's Subdivision Ordinance, the City treats residential condominiums differently from other multiple-family housing (such as apartments) because of the unique nature of condominium ownership and State Subdivision Map Act requirements. Other than the City's and State's subdivision requirements, condominiums are processed in the same manner as other multi-family residential developments (apartments). Condominium projects with four or more units are also subject to a Planning Commission Design Review. Most recent multi-family residential developments in the City have been primarily condominiums.

## **Mobile Homes**

Mobile home parks are permitted in the City's Mobile Home Park zone. The Zoning Ordinance requires a minimum of 2,100 square feet of lot area for each mobile home. Pursuant to State law, manufactured homes that meet State standards and are installed on a permanent foundation are permitted where single-family homes are permitted.

## **Manufactured/Factory-Built Homes**

Consistent with State law, factory-built, modular housing units constructed in compliance with the California Code of Regulations (CCR) Title 25 placed on a permanent foundation are considered a single-family residential use and are permitted in the same manner and where single-family homes are permitted.

## Accessory Dwelling Units/Junior Accessory Dwelling Units

The ordinance for Accessory Dwelling Units (ADU) and Junior Accessory Dwelling Units (JADU) for single-family and multi-family residential zones was effective February 2021. ADU/JADU are allowed in areas zoned to allow single-family or multi-family dwelling residential use. This can include mixed-use zones, so long as there is existing residential on that property. Specific standards established include:

- ADUs and JADUs are allowed in lots zoned to allow single-family or multi-family dwelling residential units.
- A minimum unit size of 150 square feet and maximum unit size of 500 square feet for a Junior ADU.
- The maximum size of the living area of an ADU is 850 square feet for a studio or one-bedroom, or 1,000 square feet for an ADU with more than one bedroom.
- A height limit of one story or 16 feet.
- The accessory dwelling unit shall use similar exterior siding materials, colors, window types, door and window trims, roofing materials, and roof pitch as the primary dwelling.
- In single-family residential zones, one off-street parking space is required for an ADU in addition to the space required for a single-family primary dwelling.
- No off-street parking is required if the ADU is a half-mile from a transit stop, or a block from car-share, or if on-street parking permits.

[The City is in the process of updating the current Residential Design Guidelines to become Objective Residential Design Standards \(ORDS\). The ORDS will include examples and information on the streamlining of ADUs to better inform applicants and architects on what ADU projects can access streamlined approval in the City of Redondo Beach. This effort is funded through the Senate Bill 2 \(SB2\) grant geared toward programs and projects that will further the development of housing in California.](#)

## Farmworker and Employee Housing

Redondo Beach is a highly urbanized community and its Zoning Ordinance or General Plan does not designate land for agricultural purposes. Given that there is no farmworker population in Redondo Beach, no policies or programs are needed to address farmworker housing.

Any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure within a residential land use designation, according to the Employee Housing Act. Employee housing for six or fewer persons is permitted wherever a single-family residence is permitted. To comply with State law no conditional use permit or variance will be required. The City will amend the Zoning Ordinance to address the provision of employee housing.

## **Housing for Persons with Disabilities**

The City conducted an analysis of the zoning ordinance, permitting procedures, development standards, and building codes to identify potential constraints for housing for persons with disabilities. The City’s policies and regulations regarding housing for persons with disabilities are described below.

### **Definition of Family**

A community’s Zoning Ordinance can potentially restrict access to housing for households failing to qualify as a “family” by the definition specified in the Zoning Ordinance. California court cases have ruled that a definition of “family” that: 1) limits the number of persons in a family; 2) specifies how members of the family are related (i.e. by blood, marriage or adoption, etc.), or 3) a group of not more than a certain number of unrelated persons as a single housekeeping unit, is invalid. Court rulings state that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction, and therefore violates rights of privacy under the California Constitution.

The Redondo Beach Zoning Ordinance defines a family as “an individual or two (2) or more persons related by blood, marriage, or adoption, or a group of not more than five (5) persons, excluding servants, who need not be related by blood, marriage, or adoption, living together in dwelling unit, but not including limited residential care facilities.” This definition exceeds the zoning power of a local jurisdiction. The City will amend its Zoning Ordinance to adopt an inclusive definition.

### **Zoning and Land Use**

Under the State Lanterman Developmental Disabilities Services Act (aka Lanterman Act), small community care facilities for six or fewer persons must be treated as regular residential uses and permitted by right in all residential districts. Redondo Beach is compliant with the Lanterman Act. The Zoning Ordinance defines a Residential Care Facility as one that provides 24-hour non-medical care for persons in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes: board and care homes, children’s homes, congregate living health facilities, alcoholism or drug abuse recovery treatment facilities, and similar facilities. The City does not regulate residential care homes (for six or fewer persons) and these facilities are permitted in all residential zones, except the Mobile Home Park zone. The City’s Zoning Ordinance has no spacing requirement for residential care facilities. Residential care homes for more than six persons are not addressed in the City’s Zoning Ordinance. Residential care facilities for more than six persons are conditionally permitted in the Community Facility zone. Currently, the Zoning Ordinance does not address residential care facilities that are not licensed by the State. The City will address this as part of the comprehensive update to the Zoning Ordinance to implement the updated General Plan.

According to the State Department of Social Services, a total of ten community care facilities are located in Redondo Beach, most of which are small residential care facilities that serve six or fewer persons. These include:

- Four Adult Day Care facilities – 133 persons
- Three Adult Residential Care Facilities – 108 beds

- Six Assisted Living Facilities for the Elderly – 282 beds

The Land Use Element and Zoning Ordinance provide for the development of multiple-family housing in the R-2, R-3, RMD, and RH zoning districts. Regular multiple-family housing for persons with special needs, such as apartments for seniors and the disabled, are considered regular residential uses permitted by right in these zones. The City also has a P-CF community facility zone which allows residential care facilities through a conditional use permit.

### **Building Codes**

Government Code Section 12955.1 requires that 10 percent of the total dwelling units in multi-family developments are subject to the following building standards for persons with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests.
- At least one powder room or bathroom shall be located on the primary entry level served by an accessible route.
- All rooms or spaces located on the primary entry level shall be served by an accessible route. Rooms and spaces located on the primary entry level and subject to this chapter may include but are not limited to kitchens, powder rooms, bathrooms, living rooms, bedrooms, or hallways.
- Common use areas shall be accessible.
- If common tenant parking is provided, accessible parking spaces are required.

No unique Building Code restrictions are in place that would constrain the development of housing for persons with disabilities. Compliance with provisions of the City’s Municipal Code, California Code of Regulations, California Building Standards Code, and federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building Department as a part of the building permit review and issuance process.

### **Reasonable Accommodation**

Both the federal Fair Housing Amendment Act (FHAA) and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e. modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling.

Circumstances may arise when it would be reasonable to accommodate requests from persons with disabilities to waive a setback requirement or another standard of the Zoning Ordinance to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances, and must be decided on a case-by-case basis. The City of Redondo Beach does not currently have a formal ministerial process for persons with disabilities to seek relief from the strict or literal application of development standards to enable them to enjoy their dwellings like other residents in the City.

### **Conclusion**

The City is updating the General Plan, which will be followed with a Zoning Ordinance update. As part of that update, the City will devise a formal process for providing reasonable

accommodation to persons with disabilities. The process will be available to a person, a business, or organization making a written request for reasonable accommodation in the application of land use or zoning provisions in order to facilitate the development of housing for persons with disabilities. The request will be reviewed and determined by the Community Development Director or his designee.

## **Senior Housing**

Housing for seniors is conditionally permitted in the R-3A, RMD, and RH multiple-family residential zones, in P-CF community facility as well as in all mixed use and commercial zones. The City's Zoning Ordinance identifies certain location requirements for the placement of senior housing, which include requiring housing for seniors to be within walking distance of a wide range of commercial retail, professional, social and community services, as well as bus and transit stops. Senior housing projects are permitted to exceed the density, floor area and height requirements of the underlying zone. Age verification of tenants is required annually. The City requires all owners of rental housing for senior citizens to submit an updated list of all project tenants and their age to the Community Development Director every December.

## **Emergency Shelters**

State law requires that local jurisdictions strengthen provisions for addressing the housing needs of the homeless, including the identification of a zone or zones where emergency shelters are allowed through a ministerial process. Section 50801(e) of the California Health and Safety Code defines emergency shelters as housing with minimal supportive services for homeless persons that is limited to occupancy of six months or fewer by a homeless person.

According to the 2020 Point-in-Time Homeless Count by the Los Angeles Homeless Services Authority (LAHSA), 173 unsheltered homeless are located in Redondo Beach. In September 2020, the Redondo Beach Council voted to move forward with a plan to provide temporary homeless shelters on the lot where the City's Transit Center is being constructed in the northern part of the City. The shelter operations were jointly funded by the City of Redondo Beach and the County using CDBG funds. On June 8, 2021, the City Council approved an amendment to the funding agreement with the County to continue to provide the 15 "pallet shelters" (temporary homeless shelters) at the 1521 Kingsdale site with the potential to increase the number of pallet shelters in the future. Each pallet shelter structure can accommodate two persons, for a total capacity of 30 persons. Therefore, the City's unsheltered homeless count should be reduced to 143 persons.

The City amended the Zoning Ordinance in 2017 to permit emergency shelters with approval of a ministerial permit in the I-1B zone and subject to a coastal development permit in the I-2A zone. The ordinance allows emergency shelters for the homeless as a permitted use in the I-1B zone and in the I-2A coastal zone (only I-2A in the Coastal Land Use Plan Implementing Ordinance), which are intended for a broad range of light industrial uses.

There are currently nine properties zoned I-1B and four properties zone I-2A coastal zone, totaling 18.6 acres. Specifically, one parcel (approximately one acre) in the I-1B zone is occupied by an underutilized warehousing facility. Four parcels in the I-2A coastal zone are vacant (2.6 acres), previously used as a "dirt yard." Properties in these zoning districts are



located along major transportation routes and with easy access to services and community facilities. Development standards are consistent with other uses in the same zone, with similar or lower parking requirements for emergency shelters at one space per 250 space feet. A 300-foot separation from another shelter facility is required.

However, AB 139 states that local governments may include parking requirements for emergency shelters specifying that adequate parking must be provided for shelter staff, but overall parking requirements for shelters may not exceed the requirements for residential and commercial uses in the same zone. The City will amend the Zoning Ordinance to comply with AB 139.

Furthermore, the recently passed AB 101 requires cities to allow a Low Barrier Navigation Center (LBNC) development by right in areas zoned for mixed uses and nonresidential zones permitting multi-family uses if it meets specified requirements. A “Low Barrier Navigation Center” is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” Low Barrier Navigation Centers may include options such as allowing pets, permitting partners to share living space, and providing storage for residents’ possessions. The Zoning Ordinance will be amended to address the provisions of Low Barrier Navigation Center.

In December 2022, the City instituted the Pallet Shelter housing. These Pallet Shelters are individual temporary homeless structures (15 structures total), currently located at 1521 Kingsdale Avenue in Redondo Beach on the lot where the City’s Transit Center is being constructed in the northern part of the City. The Pallet Shelters were initially jointly funded for 6 months by the City of Redondo Beach and the County using Community Development Block Grant funds. On June 8, 2021, the City Council approved an amendment to the funding agreement with the County to continue to provide the shelters.

## **Transitional Housing**

Transitional housing is a type of housing used to facilitate the movement of homeless individuals and families to permanent housing. Pursuant to SB 2 and SB 745, transitional housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City of Redondo Beach is updating the General Plan, which will be followed with a Zoning Ordinance update. As part of that update, the City will amend the Zoning Ordinance to define transitional housing pursuant to California Government Code Section 65582(h) and to permit transitional housing in all zones where residential uses are permitted, subject to the same development standards and permitting processes as the same type of housing in the same zone.

## Supportive Housing

Pursuant to SB 2, supportive housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City of Redondo Beach is updating the General Plan, which will be followed with a Zoning Ordinance update. As part of that update, the City will amend the Zoning Ordinance to define supportive housing pursuant to California Government Code Sections 65582(f) and (g), and to permit supportive housing in all zones where residential uses are permitted, subject to the same development standards and permitting processes as the same type of housing in the same zone.

Furthermore, the recently passed AB 2162 further requires supportive housing projects of 50 units or fewer to be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions. The bill also prohibits minimum parking requirements for supportive housing within ½ mile of a public transit stop. This Housing Element includes a program to amend the Zoning Ordinance to comply with AB 2162.

[The Moonstone project includes the conversion of a hotel to 20 units of permanent supportive housing \(affordable housing\). An application for funding has been submitted to the State of California for Project Homekey funding. If the grant is awarded in early 2022, the renovations are expected to be completed and apartments available for occupancy in 2022.](#)

## Single-Room Occupancy Units

Single-Room Occupancy (SRO) units are one of the most traditional forms of affordable private housing for lower income individuals, including seniors, persons with disabilities, and single workers. An SRO unit is usually small, between 80 and 250 square feet. These units provide a valuable source of affordable housing and can serve as an entry point into the housing market for formerly homeless people. Currently, the Redondo Beach Zoning Ordinance does not contain specific provisions for SRO units. The Zoning Ordinance will be amended to specifically address the provision of SRO units as a conditionally permitted use in the C-4 zone outside the Coastal Zone. The amendment will be completed as part of the Zoning Ordinance update to implement the General Plan update.

## 5. Site Improvements

The State Subdivision Map Act and Title 10 of the Redondo Beach Municipal Code authorize the City to require public improvements for new development. These improvements typically include street and park dedications, curbs, gutters, sidewalks, and drainage improvements. The requirement that developers provide public improvements may affect the cost of the housing produced. These requirements, however, are justified since they serve to mitigate the infrastructure and public service impacts generated by new housing.

In Redondo Beach, almost all housing developments involve the recycling of sites where such improvements are already in place. Repairs or replacement of existing improvements might be occasionally required. Consequently, improvement requirements do not normally pose a significant constraint.

For projects involving dedicated lower and moderate income housing, certain site improvement requirements may be waived or reduced if necessary to ensure the economic feasibility of the project. For example, the City waived certain requirements for the Heritage Pointe senior apartment project, and provided some of the necessary infrastructure improvements itself.

## 6. Fees and Other Exactions

Planning and development fees charged by local governments contribute to the cost of housing. Redondo Beach charges a variety of planning and development fees to offset the costs associated with permit processing and the provision of infrastructure and facilities. The City's planning fees presented in [Table H-37](#) are overall lower than those charged by surrounding cities while building permit and plan check fees are similar to those of surrounding cities ([Table H-38](#)).

Many cities charge development impact fees to cover the cost of added services required by new residential development. City of Redondo Beach impact fees include: a park and recreation fee (\$400/unit), a school fee (\$3.48 per square-foot of living area), a wastewater capital fee (\$2,020 for single-family and \$1,415 for multiple-family for new construction only) and a storm drain fee (which varies depending on zone and lot size, ranging from \$200 per unit in RH to \$640 per unit in R1 zone).

Quimby fees apply to projects requiring the approval of a tentative or parcel subdivision map. In August 2017, the City increased the Quimby fee cap from \$7,500 to \$25,000 per new residential unit. The cap is the maximum fee that can be charged, not necessarily the actual fee. The fee to be paid by developers is the lesser of the fee cap or a fee determined by formula incorporating the average fair market value of the amount of land that would otherwise be required for dedication. The latter formula is informed by applying the City's parkland standard of three acres of parkland per 1,000 population in calculating its Quimby fee. As Quimby is applied only to projects that require subdivision, it does not impact the development of multi-family rental housing. Furthermore, the fee is waived for below market (affordable) housing development.

Overall, development fees in the City have not increased significantly in the last few years. For a typical single-family project, a developer can expect to pay about \$18,902 per unit in total fees (including Plan Check, Permit, Planning, and all impact fees). A multiple-family project will cost a developer approximately \$29,612 per unit in total fees. The level of fees represents a very small portion of overall development costs in Redondo Beach, especially given the high land cost. Furthermore, the City has little remaining opportunity for single-family residential development. Current and future housing activities are primarily focused on recycling of single-family units into higher intensity residential uses. Nevertheless, in order to mitigate the impact of fees on the feasibility of affordable housing development, the City will consider waiving or reducing development impact fees for projects with lower and moderate income units.

The total fees for multi-family per unit are higher than for single-family. The reason is that the review for multi-family development entails considerably more building code analysis. For example, multi-family structures have to follow stricter fire code requirements, structural design elements, and safety and separation requirements. These building requirements also demand

more review. As well, larger projects require discretionary approval at Planning Commission, which adds fees that are not required of single-family development.

<b>Table H-37: Planning-Related Fees for Residential Development (FY 2021-2022)</b>	
<b>Application</b>	<b>Fee \$</b>
<b>Variance</b>	\$3,060.00
<b>Zoning Map Amendment</b>	
Property outside City's Coastal Zone	\$5,245.00
Property within City's Coastal Zone	\$7,655.00
<b>Planning Commission Design Review</b>	
Fee waived when in conjunction with an application for a Conditional Use Permit for a Condominium or Multiple-Family Residential Project	
Multiple-Family Residential	\$3,060.00
<b>Planned Development Review</b>	
In conjunction with overlay zone	\$5,245.00
In conjunction with overlay zone within City's Coastal Zone	\$7,655.00
Addition/Substantial Alteration to existing development	\$1,530.00
<b>Administrative Design Review</b>	
2-3 Multiple-Family Residential & Condominium Projects	\$2,082.00 Plus \$625.00 Per Unit
Single-Family	No Fee
<b>Conditional Use Permit</b>	
All (except Multiple-Family)	\$3,055.00
Multiple-Family (4+ units) & Condo	\$3,055.00 Plus \$1,280.00 Per Unit
Conditional Use Permit	
<b>Modification</b>	\$875
<b>Subdivisions</b>	
Parcel Map	\$1,530.00
Tract Map	\$2,370.00
Lot Line Adjustment	\$1,530.00
<b>Environmental Review Fees</b>	
Initial Study and Negative Declaration	\$1,970.00 Plus Contract Cost
Initial Study and Mitigated Negative Declaration	\$2,190.00 Plus Contract Cost
Environmental Impact Report (EIR)	Actual Cost
Supplemental Fee (for analysis of EIR)	\$1,750.00
Contract Administration for EIR	Actual Cost
<b>Plan Check Fees</b>	
New Development	50% of Building Permit Fee
Additions to Existing Development	50% of Building Permit Fee
<b>Coastal Development Permit</b>	
Public Hearing Waiver	\$325
Public Hearing	\$1,530
Development Agreement	Actual Cost
Source: City of Redondo Beach Planning Department, 2021	

Fee	Redondo Beach	Manhattan Beach	Hermosa Beach	Torrance
Conditional Use Permit	\$3,055	\$8,393	\$5,070	\$5,157- \$14,236
Variance	\$3,060	\$8,421	\$3,907	\$10,992
Zoning Map Amendment	\$5,245-\$7,655	\$20,000*	\$4,226	\$10,411
Tract Map or Parcel Map	\$1,530-\$2,370	\$1,301-\$4,074	\$4,879	\$7,408

\* Indicates deposit amount.  
Source: City of Redondo Beach (2021), City of Manhattan Beach (2020), City of Hermosa Beach (2020), and City of Torrance (2019).

## 7. Processing and Permit Procedures

### Permit Processing

Certainty and consistency in permit processing procedures and reasonable processing times are important to ensure that the City’s development process does not discourage housing developers or add costs that would make a project economically infeasible. The City is committed to maintaining comparatively short processing times. Total processing times vary by project, but most residential projects are approved in two to four months. [Table H-39](#) provides a detailed summary of the typical processing procedures and timelines of various types of projects in the City.

Project Type	Reviewing Body	Public Hearing Required	Appeal Body (if any)	Estimated Total Processing Time
Single-Family Subdivision	Community Development Department	Yes-Planning Commission	City Council	2-3 months
Multiple-Family (2-3 units)	Community Development Department	Not Required	Planning Commission	Less than 2 months
Multiple-Family (4+ units)	Community Development Department	Yes-Planning Commission	City Council	2-3 months
Multiple-Family (with subdivisions)	Community Development Department	Yes-Planning Commission	City Council	2-3 months
Mixed Use	Community Development Department	Yes-Planning Commission	City Council	2-3 months

Building and planning permits involve plan checking for building, electrical and plumbing code compliance, and zoning compliance. Single-family developments and multiple-family developments (apartments and condominiums) with two or three units are subject to administrative design review (staff level). Multiple-family with four or more units require discretionary entitlement(s) that are subject to approval by the Planning Commission at a public hearing and are also subject to environmental review pursuant to the California Environmental Quality Act (CEQA).

Development within the coastal zone is required to obtain approval of a coastal development permit. The City’s Local Coastal Program has been certified by the Coastal Commission. For most of the Coastal Zone, except State Tidelands including all areas zoned for residential development, the City has the authority to issue Coastal Development Permits for new residential development. However, some projects may still be appealed to the Coastal Commission, which

could increase processing time by several months (the appealable area of the coastal zone includes up to the first public street parallel to the water or properties within 300 feet of the beach, whichever is greater). The City’s Local Coastal Program is fully certified by the Coastal Commission.

The City provides summary handouts explaining development review and permitting procedures and is committed to maintaining reasonable processing times. The processing time for the most common residential development applications are summarized in [Table H-40](#). These applications are often processed concurrently. Depending on the level of environmental review required, the processing time for a project may be lengthened. Given the relatively short time periods required for processing residential development applications in Redondo Beach, the City’s permit processing procedures are not a significant constraint on residential development.

<b>Application</b>	<b>Estimated Processing Time</b>
Variance	1-3 months
Conditional Use Permit	1-3 months
Parcel Map or Tract Map	2-3 months
Zoning Map Amendment	4-6 months
General Plan Amendment	4-6 months
Plan Check (Community Development Department)	3-4 weeks
Building Permit	4-6 weeks
Source: City of Redondo Beach Planning Department, 2017.	

## **Design Review**

An administrative design review is conducted by the Community Development Director to review minor development projects that otherwise meet current zoning regulations. Projects that require an administrative design review include: all new single-family residences, new developments containing two or three units, additions to existing single-family residences, additions to developments containing two or three units, additions of less than 1,000 square feet to multiple-family residential developments containing four or more units, and the addition of a second unit. During the administrative design review, the following criteria are considered: traffic congestion or impairment of traffic visibility, pedestrian safety and welfare, overall design compatibility with the community and surrounding neighborhood, the impact on surrounding properties and the public health, safety and general welfare, and architectural style and design. Typically, an administrative design review can be completed within two to three weeks upon receipt of a completed application.

Design review by the Planning Commission is required to ensure compatibility, originality, variety, and innovation in the architecture, design, landscaping, and site planning of developments in the community. The Planning Commission reviews projects in order to protect property values, prevent the blight and deterioration of neighborhoods, promote sound land use, encourage design excellence, and protect the overall health, safety, and welfare of the City. Projects that require a Planning Commission design review include: new mixed use development, new multiple-family developments of four or more units, and additions of 1,000

square feet or more to multiple-family developments of four or more units. The following criteria are considered during the Planning Commission design review process: user impact and needs; the project's relationship to surrounding physical features; consistency of architectural style; balance and integration with the neighborhood, building design, signs; and consistency with residential design guidelines. Typically, design review by the Planning Commission can be held concurrently with other reviews (such as the CUP review) and can be completed within six to eight weeks upon receipt of a completed application. The City's Residential Design Guidelines are online. The City will be updating its 2003 Residential Design Guidelines to comply with SB 330 requirements on objective design standards.

### **Conditional Use Permit**

The purpose of a Conditional Use Permit (CUP) is to allow review of certain uses possessing unique characteristics to ensure that the establishment or alteration of these uses will not adversely affect surrounding uses and properties or disrupt the orderly development of the community. In reviewing an application for a CUP, the following criteria are considered by the Planning Commission:

1. The site shall be in conformity with the General Plan and shall be adequate in size and shape to accommodate such use and all setbacks, spaces, walls and fences, parking, loading, landscaping, and other features required.
2. The site shall have adequate access to a public street or highway of adequate width and pavement to carry the quantity and kind of traffic generated by the proposed use.
3. The proposed use shall have no adverse effect on abutting property or the permitted use thereof.
4. The conditions stated in the resolution or design considerations integrated into the project shall be deemed necessary to protect the public health, safety, and general welfare. Such conditions may include, but shall not be limited to:
  - a. Additional setbacks, open spaces, and buffers;
  - b. Provision of fences and walls;
  - c. Street dedications and improvements, including service roads and alleys;
  - d. The control of vehicular ingress, egress, and circulation;
  - e. Sign requirements or a sign program, consistent with the Sign Regulations;
  - f. Provision of landscaping and the maintenance thereof;
  - g. The regulation of noise, vibration, odor and the like;
  - h. Requirements for off-street loading facilities;
  - i. A time period within which the proposed use shall be developed;
  - j. Hours of permitted operation and similar restrictions;
  - k. Removal of existing billboards on the site; and
  - l. Such other conditions as will make possible the development of the City in an orderly and efficient manner and in conformity with the intent and purposes set forth in this chapter and the General Plan.

The CUP review focuses on compatibility, health and safety issues, whereas design review focuses on design elements. Because the CUP process can potentially add an element of



uncertainty to the review process, the City will address the CUP requirement as a potential constraint to multi-family housing development.

While a couple of the criteria may appear subjective, it is important to note that the City has never denied any application for development based on the proposed use. In addition, approval of a CUP runs with the attached property and does not need to be renewed periodically. The City's CUP review is primarily focused on design and site plan considerations. The CUP is processed concurrently with other reviews so no additional time is required. Furthermore, sites that are reused from the 5<sup>th</sup> cycle Housing Element and sites to be rezoned for the 6<sup>th</sup> cycle Housing Element are subject to by-right approval if 20 percent of the project units are set aside as housing affordable to lower income households, as required by State law.

## **Measure DD**

On November 4, 2008, Redondo Beach residents passed Ballot Measure DD that applies to major changes in allowable land use. "Major change in allowable land use" is defined as any proposed amendment, change, or replacement of the General Plan (including its local coastal element of the City's zoning ordinance or of the zoning ordinance for the coastal zone), meeting any one or more of the following conditions requires a public vote:

- The conversion of public land to private use;
- The re-zoning of nonresidential land for housing or mixed-use projects with more than 8.8 units per acre; and
- Changes that significantly increase traffic, density or intensity (i.e. zoning changes that add more than 25 homes, 40,000 square feet of commercial space and/or yielding more than 150 peak hour car trips).

If a project is developed under existing zoning were to trigger 150 peak hour trips or unacceptably reduce the level of service at any critical intersection, then traffic related improvements would be required in order to be consistent with Goals and Policies within the City's Circulation Element of its General Plan. A project triggering traffic impacts requiring improvements is not subject to Measure DD and does not require a public vote.

For the 2021-2029 Housing Element, the City relies on the capacity created by new land use designations as part of the General Plan Update to accommodate the City's Regional Housing Needs Allocation (RHNA) (discussed in detail in the next section). The new General Plan will trigger Measure DD and is scheduled to be placed on the ballot in November 2022.

The City has conducted extensive community outreach for the General Plan update, including 22 GPAC meetings. The City will continue to conduct outreach and education regarding the importance of the update and compliance with State law. The City will monitor court cases concerning zoning requiring a public vote and consider adjusting provisions of the City's Charter (Measure DD) as necessary per court decisions.



## **B. Non-Governmental Constraints**

Non-governmental constraints on housing production include high cost of land, cost of construction, and financing. These costs are determined primarily by market conditions over which local governments have little control. Governments may lessen the impacts of these market conditions through direct public subsidies of housing development such as land write-downs and interest subsidies.

### **1. Construction Costs**

One indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not take into account regional differences, nor include the price of the land upon which the building is built. In 2020, according to the latest Building Valuation Data release, the national average for development costs per square foot for apartments and single-family homes in 2020 are as follows:

- Type I or II, R-2 Residential Multifamily: \$148.82 to \$168.94 per sq. ft.
- Type V Wood Frame, R-2 Residential Multifamily: \$113.38 to \$118.57 per sq. ft.
- Type V Wood Frame, R-3 Residential One and Two Family Dwelling: \$123.68 to \$131.34 per sq. ft.
- R-4 Residential Care/Assisted Living Facilities generally range between \$143.75 to \$199.81 per sq. ft.

In general, construction costs can be lowered by increasing the number of units in a development, until the scale of the project requires a different construction type that commands a higher per square foot cost. These costs are exclusive of the costs of land and soft costs, such as entitlements, financing, etc. The City's ability to mitigate high construction costs is limited without direct subsidies. Another factor related to construction cost is development density. For multiple-family attached units, construction costs are slightly lower as developers can usually benefit from economies of scale with discounts for materials and diffusion of equipment mobilization costs. Construction costs are relatively consistent throughout Los Angeles County, and therefore high construction costs are a regional constraint on housing development rather than a local constraint.

### **2. Land Costs**

In coastal areas such as Redondo Beach, the single largest constraint to new affordable housing is the price of land. The diminishing supply of land available for residential construction combined with a fairly steady demand for housing has served to keep the cost of land high. High and rapidly increasing land costs have resulted in home builders developing increasingly expensive homes in order to capture profits. The City's supply of vacant residential land is

extremely limited. A survey of listings on Realtor.com in May 2021 found only one vacant parcel in Redondo Beach, priced at approximately \$12.7 million per acre.

### 3. Availability of Mortgage and Rehabilitation Financing

The availability of financing affects a person’s ability to purchase or improve a home. Interest rates are determined by national policies and economic conditions, and there is little that local government can do to affect these rates.

#### Home Purchase and Home Improvement Financing

Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants.

As shown in [Table H-41](#), according to the latest available HMDA data, a total of 2,757 households applied for loans, either conventional or government-backed, to purchase homes in Redondo Beach in 2017. Approval rates were slightly higher for government backed home purchase loans with 85.7 percent of government-backed and 72.6 percent of conventional loan applications approved. The approval rate for home improvement loans was 57 percent. Given the high rates of approval for home purchase loans, financing was generally available to Redondo Beach residents. In comparison, the availability of home improvement financing is more limited.

Loan Type	Total Applications	Percent Approved	Percent Denied	Percent Other
Government Backed Purchase Loans	14	85.7%	0%	14.3%
Conventional Purchase Loans	1,031	72.6%	8.6%	18.8%
Refinance	1,512	58.4%	16.0%	25.6%
Home Improvement Loans	200	57.0%	16.5%	26.5%
<b>Total</b>	<b>2,757</b>	<b>63.8%</b>	<b>13.2%</b>	<b>23.0%</b>

Notes:

1. FFIEC changed the format of reporting in 2018 and due to delays in data reformatting, post-2017 data is not yet available by jurisdiction.
2. Percent Approved includes loans approved by the lenders whether or not accepted by the applicant.
3. Percent Other includes loan applications that were either withdrawn or closed for incompleteness.

Source: Federal Financial Institutions Examination Council, CLC Compliance Technologies, data accessed in 2020

### 4. Timing and Density

In Redondo Beach, development projects typically maximize the allowable density. It is common that development projects yield over 90 percent of the allowable density given the high cost of land and limited developable land remaining in the community.

Non-governmental market constraints can also include timing between project approval and requests for building permits. In most cases, this may be due to developers’ inability to secure financing for construction. In Redondo Beach, the average time between project approval and

request for building permit is typically three to four months for infill projects, six months to one year for larger development projects.

## 5. Environmental Constraints

### Geologic and Seismic Hazards

The City of Redondo Beach is situated within the western edge of the Los Angeles Basin, near the boundary of the Southern California Continental Borderland Geomorphic Province. The Los Angeles Basin is underlain by both marine and non-marine accumulations of gravel, sand, silt, and clay, that were deposited over time as a consequence of sea level fluctuations and erosion of the land masses north, east, and south of the Los Angeles Basin.

Currently no active or potentially active faults are known to exist within the City of Redondo Beach. The Redondo Canyon fault has a structural trend that would project on-shore in the vicinity of King Harbor, however, existing data suggests that the fault terminates very close to the shoreline. However, the City lies in a seismically active region where numerous faults are capable of generating moderate to large earthquakes. The major faults are related to the San Andreas fault system. The regional faults that may generate earthquakes that could affect the City of Redondo Beach are:

**Elysian Park Fault:** Three years of recently observed seismic activity suggests that this newly discovered thrust fault trends at least 50 miles from Whittier to Malibu across the northern portion of the Los Angeles Basin. Earthquakes of magnitude 7 may be generated by subsurface movement of this fault. The fault is located approximately 11 miles north of Redondo Beach.

**Cabrillo Fault:** This fault extends approximately 12 miles across the San Pedro shelf. The fault may deform Holocene sediments and has had numerous small earthquakes occur near its trace. The fault is considered active. The fault's slip rate suggests a recurrence interval for a magnitude 6.0 earthquake of greater than 400 years, however, no data are available as to when the last earthquake approaching that magnitude occurred. The fault is located approximately eight miles from the City.

**Palos Verdes Fault:** The Palos Verdes (or Palos Verdes Hills) fault extends from the Santa Monica-Malibu Coast fault in northern Santa Monica Bay southeastward across the Palos Verdes Peninsula and the San Pedro Shelf to the vicinity of Lasuen Knoll, a distance of more than 50 miles. The fault is considered to be active on either side of the peninsula. A 3.9 magnitude earthquake was attributed to the fault in 1972 in the area south of San Pedro. Earthquake magnitude ranges for the fault are from about 5.0 to 7.0 with recurrence interval for a magnitude 6.0 earthquake being about every 300 years. Data were unavailable indicating when the last 6.0 earthquake occurred. Segments of the fault across Santa Monica Bay, across the Palos Verdes Peninsula, and southeast of San Pedro, are all considered to be potentially seismogenic. The fault is closest to the City of Redondo Beach where it cuts across Santa Monica Bay, approximately two and one-half miles southwest of the City.

**Redondo Canyon Fault:** This fault is approximately eight miles long and joins the main strand of the Palos Verdes fault near the shoreline off the City of Redondo Beach. Scattered small

earthquakes have occurred near the fault. The fault is considered active with an estimated maximum credible magnitude of 6.5. Recurrence intervals were not available because of a lack of data regarding the slip rate.

**Charnock Fault:** The Charnock fault consists of two strands that cut Late Quaternary strata and leave no surface expression. The fault is about six miles long and is located about four miles north of the City. No recurrence interval data was available.

**Newport-Inglewood Fault System:** This fault system is over 45 miles in length and is located approximately 6.5 miles east of the City. The fault is considered active and was the source of the 1933 magnitude 6.3 Long Beach earthquake. It is unlikely that this fault segment between Signal Hill and Newport Beach will be the source of another major earthquake in the near future. However, it is possible that the 25 mile segment between Cheviot Hills and Signal Hill could produce a major earthquake event.

**San Pedro Fault:** This fault is located approximately 15 miles offshore and consists of a series of strands that cut Late Quaternary strata. The fault length is about 45 miles, generally paralleling the coastline. Recurrence intervals for a magnitude 6.0 earthquake are about every 300 years, however, actual dating of the last earthquake close to that magnitude is unknown.

**Hollywood-Raymond Hill Fault System:** This system extends in an east-west direction along the south side of the Santa Monica Mountains and may be continuous with the Raymond fault in the vicinity of Glendale. The fault is located about 15 miles north of the City. There is a high probability that this fault system is capable of generating damaging earthquakes.

**Santa Monica-Malibu Coast Fault System:** These faults extend approximately 60 miles in an east-west direction from north of Santa Monica into the Santa Barbara Channel. The faults are located about 11 miles north of the City. The Malibu Coast segment of this system experienced a 5.7 magnitude earthquake in 1973.

**Whittier Fault:** The Whittier fault is approximately 28 miles long and is located about 20 miles east of the City. This fault may have been the source of the 1987 6.1 magnitude Whittier Narrows earthquake. Recurrence intervals on this fault are relatively short with 20 to 40 year estimates for magnitude 6.0 earthquakes.

**Elsinore Fault:** The Elsinore fault is approximately 130 miles long and is located about 50 miles east of the City. The fault was the site of a 1910 magnitude 6.0 earthquake. Recurrence intervals are relatively short with a 20 to 90 year recurrence for a magnitude 6.0 earthquake.

**Catalina Escarpment Fault:** This offshore fault is approximately 80 miles long and is located about 35 miles west of the City. Recurrence intervals are about every 300 years for a magnitude 6.0 earthquake.

**San Fernando-Sierra Madre Fault System:** This fault system is approximately 36 miles long and extends along the base of the San Gabriel Mountains from east of Sierra Madre to west of San Fernando. These faults are found about 30 miles north of the City. The San Fernando

segment was the source of a 1971 magnitude 6.6 earthquake. Recurrence intervals are estimated at 100 years for a magnitude 6.0 earthquake.

**San Andreas Fault System:** This fault system forms the dominant geologic structure throughout most of western California and has been responsible for the largest recorded earthquakes in the region. The fault system segment between Parkfield and Cajon Pass currently has a very low level of seismic activity. However, the portion of the fault system from Parkfield to Tejon Pass has experienced great earthquakes of magnitude 8+ roughly every 250 years and the segment between Tejon Pass and Cajon Pass has experienced major to great earthquakes (magnitude 7 and greater) on an average of every 145 years. The fault system segment between Cajon Pass and the Salton Sea has not experienced a major earthquake for at least 265 years and possibly for as long as 600 years. Various earthquake studies suggest that this segment may be the location for the next great earthquake in California with probabilities of between 2 and 5 percent per year or about 50 percent in the next 20 or 30 years. Future earthquake predictions of magnitude and displacement cannot precisely be determined along the San Andreas fault system. Regional studies do, however, indicate that a magnitude 8.0 or larger earthquake could be expected to occur in the future and should be considered for planning and design purposes. The closest these latter fault system segments come to the City is about 52 miles to the northeast. A major earthquake along this system should be considered a strong possibility and would produce ground accelerations of about 0.14 g within the City.

**San Jacinto Fault System:** In terms of numbers of damaging earthquakes, this system has been the most prolific in historical time. At least 10 earthquake events have taken place from 1858-1980 over a fault length of 120 miles, with about half of these earthquakes causing damage in the San Bernardino-Riverside area. Recurrence intervals suggest a magnitude 6.0 within 4 to 10 years and a magnitude 7.0 within 40 to 100 years. The fault system's closest point to the City is about 55 miles to the east, therefore, even though a moderate earthquake magnitude could occur at any time the actual expected damage within the City would probably be quite small.

### **Liquefaction Hazards**

Liquefaction is a process whereby strong earthquake shaking causes sediment layers that are saturated with ground water to lose strength and behave as a fluid. This subsurface process can lead to near-surface or surface ground failures that can result in property damage and structural failure. Generally, sand and silty sand, that is poorly compacted and of Holocene age is most susceptible to liquefaction. These types of deposits can be found and are dominant within the City of Redondo Beach. Potential ground shaking within the City from a moderate to severe earthquake would be adequate to be within a threshold distance to generate liquefaction impacts.

Ground water depths within 30 feet of the ground surface is also a condition necessary for liquefaction to occur. For the City of Redondo Beach, a very high zone of liquefaction susceptibility exists within the coastal area where elevations are less than 30 feet above sea level.

### **Flooding Hazards**

Significant and far-reaching portions of the Los Angeles Basin (including the City of Redondo Beach) have experienced flooding events during historic times. Some of the more notable flood events occurred in the early 1800's, when the Los Angeles River would periodically shift its

course/direction and eventual discharge point into the Pacific Ocean, alternating between the Santa Monica Bay area and the San Pedro/Long Beach Harbor areas. Concrete channelization of the major rivers and drainages in the region and the installation of additional modern flood control and prevention improvements (primarily through the Los Angeles Department of Public Works Flood Control Division and Army Corps of Engineers) have reduced the potential for and occurrences of regional-scale flooding substantially over time.

For the most part, all areas in the City of Redondo Beach (particularly those most susceptible to flooding) are well served by the existing local storm drainage network. The network is a cooperative, multi-jurisdictional system, partially maintained by the City of Redondo Beach Public Works Department and partially maintained by the Los Angeles County Department of Public Works Flood Control District. In general, the system is comprised of a series of catch basins and sumps (which either through gravity or forced pumping) direct excess runoff and storm water into the network of storm drain pipes located below the local streets. These pipes carry and discharge the water into the Dominguez Channel or into the Pacific Ocean through one of the thirteen local outfalls located along the southwestern shoreline of the City. In addition to the inland storm drainage system, the harbor and harbor basin area of the City (located in the northwestern area of South Redondo Beach and including the various marinas located in the City) are protected from coastal flooding and damage related to storm-generated flooding by a large rock/stone material rip-rap breakwater wall.

The Federal Emergency Management Agency (FEMA), under the Federal Insurance Administration, has qualitatively rated and mapped the potential for flooding within the City of Redondo Beach as part of the National Flood Insurance Program (Community Panel Reference Numbers 060150-6002-B and 060150-0001-B, effective date September 15, 1983). Under the program all areas of the community are placed within one of ten different categories signifying their potential for flooding during a given increment of time (years). The vast majority of the City of Redondo Beach (in both North Redondo Beach and South Redondo Beach) has been rated in the (C) category, and is subject to minimal or no flooding.

A total of seven small and isolated areas in North Redondo Beach have been rated as subject to greater than minimal flooding, and have been designated with one of the nine substantive flood hazard ratings. These areas include: 1) a small, low-lying, rectangular-shaped area within the North Redondo industrial area, located due north of the intersection of Marina Avenue and Aviation Boulevard; 2) a small, low-lying, oval-shaped area located due northwest of the intersection of Inglewood Avenue and Manhattan Beach Boulevard; 3) a small, low-lying, linear/oval-shaped area within the turfed Southern California Edison transmission corridor right-of-way, located east of Dow Avenue, between Manhattan Beach Boulevard and Beland Boulevard; 4) a small, low-lying, circular-shaped area located along the public right-of-way and residential area along Carnegie Lane, between Blossom Lane (to the east) and Green Lane (to the west); 5) a small, low-lying, oval-shaped area located within the California Water Service Company Reservoir #10 property (to the rear of the former Andrews School property), located due west of Aviation Way and due north of Rockefeller Lane; 6) a small, low-lying, triangular-shaped area in a single family residential area, located due northwest of the intersection of Ripley Avenue and Rindge Lane; and 7) a small, low-lying, trapezoidal-shaped area (one of the five

existing and aforementioned drainage sumps), located due south of the intersection of Aviation Boulevard and Artesia Boulevard, between Ford Avenue and Goodman Avenue.

A total of five small and more isolated areas and three larger and more prominent areas in South Redondo Beach have been rated as subject to greater than minimal flooding, and have been designated with one of the nine substantive flood hazard ratings. The five smaller and more isolated areas include:

- (1) A small, low-lying, and rectangular-shaped area (within the Southern California Edison transmission corridor right-of-way now being used as a commercial plant nursery), located due south of Anita Street, between Harkness Lane, to the east, and Goodman Avenue, to the west. This area is rated in the (B) category (i.e., areas between the expected limits of minimal flooding (from only a 500 year storm event) and the areas within the expected limits of flooding resulting from a 100 year storm event (i.e., based on historic trends and data, has the probability of occurring once approximately every 100 years).
- (2) A small, low-lying, circular-shaped area (one of the five aforementioned drainage sumps), in the center of the Redondo Beach Union High School athletic fields), located due east of Helberta Avenue, between Del Amo Street, to the north, and Vincent Street, to the south. The center of the area is rated in the (A1-A30) category (i.e., areas within the expected limits of flooding resulting from a 100 year storm event, with flood elevations and hazards determined). The outer ring of the area is rated in the (B) category, (i.e., areas between the expected limits of minimal flooding (from only a 500 year storm event) and the areas within the expected limits of flooding resulting from a 100 year storm event (i.e., based on historic trends and data, has the probability of occurring once approximately every 100 years). This area is also the focus of major storm drainage improvements that are currently planned by the County of Los Angeles Department of Public Works Flood Control Division under the Vincent Street Drain Project.
- (3) A small, low-lying, oval-shaped area (along the South Irena Avenue right of way and adjoining residential area), located between Vincent Street, to the north, and Spencer Street, to the south. The area within the right of way is rated in the (A1-A30) category (i.e., areas within the expected limits of flooding resulting from a 100 year storm event, with flood elevations and hazards determined). The area within the residential portion is rated in the (B) category, (i.e., areas between the expected limits of minimal flooding (from only a 500 year storm event) and the areas within the expected limits of flooding resulting from a 100 year storm event (i.e., based on historic trends and data, has the probability of occurring once approximately every 100 years). This area will also be served by the major storm drainage improvements that are currently planned by the County of Los Angeles Department of Public Works Flood Control Division under the Vincent Street Drain Project.
- (4) A small, low-lying, rectangular-shaped area (within the southern half of Alta Vista Park), located due southeast of the intersection of Camino Real and Juanita Avenue. The

northern three-quarters of the area is rated in the (A1-A30) category (i.e., areas within the expected limits of flooding resulting from a 100 year storm event, with flood elevations and hazards determined). The southern one-quarter of the area is rated in the (B) category, (i.e., areas between the expected limits of minimal flooding (from only a 500 year storm event) and the areas within the expected limits of flooding resulting from a 100 year storm event (i.e., based on historic trends and data, has the probability of occurring once approximately every 100 years).

- (5) A small, low-lying, oval-shaped area (one of the five aforementioned drainage sumps [the Avenue "H" Sump]), located due southeast of the intersection of Avenue H and Massena Avenue. This area is rated in the (A1-A30) category (i.e., areas within the expected limits of flooding resulting from a 100 year storm event, with flood elevations and hazards determined). This area is the focus of major storm drainage improvements that are currently planned by the County of Los Angeles Department of Public Works Flood Control Division under the Doris Coast Pump Station Project.

The three larger and more prominent areas of potential flood hazard in South Redondo Beach include:

- (1) A large, extremely low-lying, rectangular-shaped area at the far southwestern corner of the City (including the beach and waterfront area), located due west of the Esplanade, between Avenue "I", to the north, and the City of Torrance municipal boundary, to the south. This area is subject to coastal storm and wave action impacts related to the geographic function of the Palos Verdes Peninsula, and is rated in the (V) category, (i.e., areas within the expected limits of coastal flooding with velocity (i.e., wave action) resulting from a 100 year storm event, with flood elevations and hazards not determined;
- (2) A large, low-lying, linear/rectangular-shaped area at the far southern end of the City (including the Avenue "I" right-of-way and commercial parcels directly on the north and south sides of the right-of-way, between South Elena Avenue, to the east, and the Esplanade, to the west. This area is rated in the (B) category, (i.e., areas between the expected limits of minimal flooding (from only a 500 year storm event) and the areas within the expected limits of flooding resulting from a 100 year storm event (i.e., based on historic trends and data, has the probability of occurring once approximately every 100 years). Drainage capacity in this area will be improved by major storm drainage improvements that are currently planned by the County of Los Angeles Department of Public Works Flood Control Division under the Knob Hill Coast Drain Project.
- (3) A large and generally oval-shaped area including: a) the entirety of the harbor and harbor basin bulkhead areas within the existing breakwater closest to the water's edge; b) the harbor basin areas themselves; c) the area of the location of the Municipal Pier; d) the breakwater itself; and e) the water areas directly outside the breakwater. All of these areas are also subject to greater than minimal flooding hazard. As previously mentioned, flood protection capabilities in the harbor area as a whole, will be incrementally improved by the project currently underway between the City of Redondo Beach and the



United States Army Corps of Engineers to raise the height level of the existing breakwater facility.

## **Fire Hazards**

Local fire protection and prevention services (and paramedic services) within the community are provided by the City of Redondo Beach Fire Department. The Fire Department maintains three facilities in the City, including two fire stations and a fire boat. Fire Station #1 is located at 401 South Broadway (at the southwestern intersection of Pearl Street and Broadway) in South Redondo Beach; Fire Station #2 is located at 2400 Grant Avenue (at the southeastern intersection of Grant Avenue and Mackay Lane) in North Redondo Beach; and the fire boat is berthed adjacent to the Harbor Master's office (at the western terminus of Mole B) in South Redondo Beach.

The City of Redondo Beach Fire Department utilizes a constant manning/qualified relief staff system, using three 24-hour shifts that work a 56-hour work week. The City of Redondo Beach Fire Department provides estimated emergency response times (in minutes), based on an analysis of actual calls and responses, for the time that it takes for fire equipment and crews to reach any site in the City, once the call is received at the fire station.

Because of the highly urbanized and built-out nature of the City of Redondo Beach, the risk of wildfires is extremely negligible (the only large, undeveloped areas in the City with any measurable risk of fire hazard are the Wylie/Steinhart Sump, located at the southwestern intersection of Ford Avenue and Artesia Boulevard in North Redondo Beach, and Hopkins Wilderness Park, located at the northeastern intersection of Knob Hill Avenue and North Prospect Avenue in South Redondo Beach).

The overall risk of fire hazard in local communities is rated, primarily to establish homeowner insurance rates, by the Commercial Risk Services Division of the Insurance Service Office (ISO), an independent, non-profit company which provides information and related services to the insurance industry. This body rates two aspects of a community's fire system: a) the local fire department's conditions and operation; and b) the local water system's conditions and operation. These two aspects are then combined, to establish an overall community rating. The existing rating system utilizes an ascending numerical scale, ranging from Class 1 (the best) to Class 10 (the worst). The latest available rating for the City of Redondo Beach is for 1988. At that time, the water department condition and operation aspect of the City of Redondo Beach (the California Water Service Company) was rated as a Class 1; the fire department condition and operation aspect of the City of Redondo Beach (the City of Redondo Beach Fire Department) was rated as a Class 3; the overall community rating is a Class 2, generally considered excellent for communities of comparable size and character.

## **6. Availability of Water and Sewer Services**

Pursuant to SB 1087, the City will provide a copy of the adopted 2021-2029 Housing Element to the water and sewer service providers, which are required by State law to have adopted policies prioritizing the provision of water and sewer services to affordable housing proposals.

### **Sanitary Sewer Service**

Sanitary sewer service is provided in the City of Redondo Beach through a coordinated multi-jurisdictional system containing different facilities, some of which are operated/ maintained by the City of Redondo Beach Public Works Department and some of which are operated/maintained the County of Los Angeles Sanitation Districts. For the County’s planning and operational purposes, the City actually falls within two geographically separate but equivalent districts: 1) County Sanitation District #5, which includes all of North Redondo Beach; and 2) the South Bay Cities Sanitation District, which includes all of South Redondo Beach.

Sewage is collected through a network of sewer mains located below virtually every street in the City and pumped towards the east through pump stations into centralized larger “trunk lines” to be treated at the Joint Water Pollution Control Plant (part of the county's Joint Outfall System, which consists of six treatment plants and four submarine outfalls). This plant is operated and maintained by the Los Angeles County Sanitation Districts, and is located in the City of Carson, approximately five miles east of the city. This plant serves communities throughout the entire South Bay, as well as communities located as far east as Downey and as far north as Inglewood. The Joint Water Pollution Control Plant in Carson, California provides primary and secondary treatment for approximately 260 million gallons per day (mgd), and has a total permitted capacity of 400 mgd.

The 2010 Sewer Master Plan indicates that the total existing average sewage generated in the City is estimated at 5.99 mgd. According to the 2010 Master Plan, less than one percent of the City’s sewer system has significant deficiencies, and none of the deficiencies will prohibit growth. In assessing the capacity of the City’s sewer system, the 2010 Master Plan uses projections in population and nonresidential buildout in 2030 adequate to accommodate the City’s RHNA. All new growth can be accommodated by the City’s sewer system with scheduled upgrades outlined in the capital improvements plan that is included as part of the 2010 Sewer Master Plan. Recent sewer improvement projects include:

- Basin 2 Marine Vessel Sewer Pump Out Station
- Rindge Sewer Pump Station Construction
- Sanitary Sewer SCADA
- Alta Vista Sewer Pump Station Design/Construction
- Morgan Sewer Pump Station Design/Construction
- Sanitary Sewer Facilities Rehabilitation

### **Water Service**

The City of Redondo Beach receives its water service from the California Water Service Company (CWSC), an investor-owned public utility whose operations are regulated by the State of California Public Utilities Commission (PUC). The California Water Service Company has been providing water service to the City since 1927. For operational and maintenance purposes, the City of Redondo Beach is classified within the Hermosa-Redondo District, an area containing all of the City of Hermosa Beach, all of the City of Redondo Beach, and an 800-acre portion of the City of Torrance located directly south and southwest of the City of Redondo Beach. All water supplied to and used in the City of Redondo Beach comes from one of two sources:

- (1) Water purchased by the California Water Service Company from the larger, regional Metropolitan Water District. This water is pumped into the city through four Metropolitan Water District connector lines.
- (2) Water pumped up from local groundwater sources by the California Water Service Company through a series of three wells located in the far north end of North Redondo Beach.

Approximately 85 percent of the water supplied to the City of Redondo Beach is purchased from the Metropolitan Water District, while approximately 15 percent is pumped up from groundwater sources through wells in the city. The California Water Service Company reports that it is presently meeting all of the district's existing water service needs and the vast majority of its systems pipes are in better than average conditions. According to CalWater's Urban Water Management Plan, water demand in the Hermosa-Redondo District is anticipated to reach 14,778 AFY in 2040. The water supply is projected to be 14,967 AFY in 2040. Therefore adequate water supply is available to accommodate the City's housing needs through 2040, well beyond the current RHNA planning period.

## 2.2.4 Housing Resources

This section analyses the resources available for the development, rehabilitation, and preservation of housing in Redondo Beach, including the preservation of affordable housing at risk of converting to market-rate housing. This analysis includes an evaluation of the availability of land resources for future housing development, the City’s ability to satisfy its share of the region’s future housing needs, financial resources available to support housing activities, and administrative resources available to assist in implementing the City’s housing programs and policies. Additionally, this section presents opportunities for energy conservation.

### A. Availability of Sites for Housing

#### 1. Regional Housing Needs Allocation (RHNA)

State law requires that a community provide adequate sites with residential development potential to allow for and facilitate production of the City’s regional share of housing needs. To determine whether the City has sufficient land to accommodate its share of regional housing needs for all income groups, the City must identify “adequate vacant and underutilized sites.” Under State law (California Government Code section 65583[c][1]), adequate sites are those with appropriate zoning and development standards, and services and facilities to facilitate and encourage the development of a variety of housing for all income levels. Redondo Beach’s Regional Housing Needs Allocation (RHNA) for the 2021-2029 planning period has been determined by SCAG to be 2,490 housing units, including 936 units for very low income households,<sup>4</sup> 508 units for low income households, 490 units for moderate income households, and 556 units for above moderate income households ([Table H-42](#)).

Changes in State law (SB 166 and SB 1333) require local jurisdictions to continue to monitor its ability to accommodate its RHNA as development occurs on available sites at an intensity or income level not consistent with the assumptions used in the Housing Element. To address this requirement, the City’s sites inventory for RHNA includes a 10 percent buffer for the lower income RHNA.

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<sup>4</sup> Pursuant to new State law (AB 2634), the City must estimate its existing and future housing needs for extremely low income households needs based on Census income distribution or assume 50 percent of the very low income households as extremely low. Assuming 50 percent of the very low income households as extremely low, the City’s very low income RHNA of 936 units is split into 468 extremely low income and 468 very low income units. However, State law does not require the separate identification of sites for the extremely low income units.

## 2. Progress Toward RHNA

### Entitled/Approved/Under Review Projects

For the 6<sup>th</sup> cycle RHNA, the projection period begins on July 1, 2021. Therefore, housing units entitled, approved, or under review but are not expected to be issued building permits until after July 1, 2021, can be credited toward the 6<sup>th</sup> cycle RHNA.

#### **South Bay Galleria Project – Located in north Redondo Beach**

This project represents redevelopment of a portion of the South Bay Gallery shopping mall. The project has been entitled for a total of 300 units, including 30 very low income units. These units are conditioned per the approved entitlement. As implementation of the units is realized, deed restrictions will be recorded. Actual rents can be estimated. Construction of this project will occur in phases, with the first phase of this project expected to begin in 2022.

#### **Legado Mixed Use Project – Located in south Redondo Beach**

The Legado project – a mixed use project of 115 units and 22,000 square feet of retail and restaurant space – is being developed on a three-acre site at the maximum (100 percent) of the allowable density. The project was completing plan check as of July 2021.

#### **Alcast Foundry – Located in north Redondo Beach**

This entitled project represents a reuse of an existing Alcast Foundry property, currently used as RV parking and truck storage. The project consolidates six parcels for the development of 36 townhomes. Construction of this project is expected to begin in 2022.

#### **Catalina Village – Located in south Redondo Beach**

This project is under review, which would provide a total of 30 new dwelling units, 4 of which would fall under the very low income category according to the application. The environmental review will be completed and entitlement applications considered in spring 2022.

#### **The Moonstone (Project Homekey) – Located in south Redondo Beach**

This proposed project includes the conversion of a hotel to 20 units of permanent supportive housing (affordable housing). An application for funding has been submitted to the State of California for Project Homekey funding. If granted, the project is exempt from local approvals and California Environmental Quality Act review. If the grant is awarded in early 2022, the renovations are expected to be completed and apartments available for occupancy in 2022.

### Anticipated Accessory Dwelling Units (ADUs)

New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of Accessory Dwelling Units (ADUs). As a result, the City has seen increases in ADUs in the community:

- 2017 – 11 ADUs
- 2018 – 17 ADUs
- 2019 – 23 ADUs
- 2020 – 21 ADUs

- 2021 – 19 ADUs and 5 JADUs

The slight decrease in ADU permits in 2020 was largely due to COVID. For 2021, the City issued building permits for 19 ADUs and 5 JADUs. Based on this rising trend, the City anticipates permitting an average of 30 ADUs annually for the next eight years. The City updated the ADU Ordinance in 2020. This Housing Element also includes a program to facilitate the development ADUs.

According to the SCAG Regional Accessory Dwelling Unit Affordability Analysis that has been reviewed and approved by HCD, the income/affordability of ADUs in the South Bay can be estimated at:

- 17 percent extremely low/very low income
- 43 percent low income
- 6 percent moderate income
- 34 percent above moderate income

Table H-42 shows the distribution of the projected ADUs according to this income distribution.

### Remaining RHNA

Accounting for entitled projects and projected ADUs, the City needs to plan for another 1,894 units (including a 10 percent buffer for the lower income RHNA), as shown in Table H-42.

	Very Low	Low	Moderate	Above Moderate	Total
<b>RHNA</b>	936	508	490	556	2490
<b>With 10% No Net Loss Buffer (Lower Income)</b>	1,030	559	490	556	2,635
<b>Credits toward RHNA</b>	<u>54</u>	0	0	<u>447</u>	<u>501</u>
Galleria	30	0	0	270	300
Legado	0	0	0	115	115
Alcast Foundry	0	0	0	36	36
<u>Catalina Village</u>	<u>4</u>	<u>0</u>	<u>0</u>	<u>26</u>	<u>30</u>
<u>Moonstone (Project Homekey)</u>	<u>20</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>20</u>
<b>Anticipated ADUs</b>	41	103	14	82	240
<b>Remaining RHNA Obligations (with 10% buffer)</b>	<u>935</u>	456	476	<u>27</u>	<u>1,894</u>

### 3. Residential Sites Inventory

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction’s share of the region’s projected growth. During at least the past ten years, Redondo Beach had seen primarily residential and mixed use development in the community. Standalone nonresidential development is infrequent, consistent with the trend throughout the region. Therefore, the sites inventory for the 6<sup>th</sup> cycle RHNA is

comprised of multiple strategies – residential recycling, residential development on religious facility properties, mixed use development, and residential overlay over industrial and commercial zones.

### **Realistic Density and Lot Consolidation**

Future residential development in Redondo Beach most likely will occur on underutilized lots where developments are not built out to the maximum density permitted. Recycling opportunities identified in this inventory focus on the City’s MU, R-2, R-3 zones, and the Residential Overlay areas proposed by the General Plan update. In these areas, existing development typically ranges from small scale apartments, to older commercial properties, and old industrial uses. In these existing zones, properties have realized developments at an average of 80 percent of the maximum allowed density. Specifically, most infill developments in the R-3 zone have yielded about 14 to 16 units per acre, depending on lot size, and developments in the MU zones have yielded between 25 and 34 units per acre, depending on lot size.

Alcast Foundry, a recently approved 36-unit project in the R-3 zone, yielded a density of 16.3 du/ac (93 percent of allowable density). This project involves the consolidation of six parcels currently used for industrial activities and truck storage. Another proposed mixed use project at 100-132 N. Catalina Avenue is an adaptive reuse of a commercial historic building and construction of 30 new rental units, four of the units will be affordable. The proposed project will consolidate six parcels with 14 lots and yield a density 23.6 du/ac in R-3A zone (135 percent of allowable density, inclusive of an affordable housing density bonus). Legado, another mixed use project, yields a gross density of 26.7 units per acre but a net density of the maximum allowable density of 35 du/ac as one of the four acres on that site is not part of the project.

### **Residential Recycling**

Due to limited vacant residential properties available for development, the City’s residential neighborhoods have been experiencing recycling into higher intensities during the past decade. Typical residential developments involved the recycling of single-family lots in medium density zones (R-2 and R-3) into small condominium developments of two to three units.

- 2017 - 41 two- and three-unit condominium projects were approved
- 2018 – 24 two- and three-unit condominium projects were approved
- 2019 – 25 two- to four-unit condominium projects were approved
- 2020 – 10 two- to four-unit condominium projects were approved

The lower number of projects in 2020 was probably directly a result of COVID. The City anticipates this trend will resume. To identify additional residentially zoned parcels with potential for recycling opportunities, the following criteria were used:

- Parcel is currently vacant; or
- If parcel is not vacant:
  - Land value is greater than improvement value
  - Structure was built prior to 1990 (and therefore over 30 years of age)
  - Existing uses are not condominiums or apartments

- Redevelopment can at least double the number of units existing on site

A total of 826 parcels met these criteria. The majority of the parcels are zoned R2 and R3. Parcels that cannot yield projects that are similar to recent recycling trends have been removed from this residential recycling inventory. These parcels can potentially yield 892 net units, conservatively assuming development at 80 percent of the allowable densities. Realistic capacity typically exceeds 90 percent in these neighborhoods due to the small lots and high housing prices.

In addition, in the Kingsdale neighborhood, the General Plan proposes to rezone this area from R-1 single-family residential use to RH (30 du/ac), with the potential to yield 50 net new units. However, due to the small size of these parcels (most are half lots), lot consolidation of five to seven parcels would be needed to assemble a half-acre site feasible for facilitating lower income housing. Therefore, this area is assigned to the moderate income RHNA, recognizing the challenge of assembling lots in this magnitude. The State passed SB 9 in 2021, allowing single-family lots of 2,500 square feet or more to split into two equal lots and allowing two units on each split lot. Given the City's long history of recycling existing single-family uses into higher intensity residential uses, SB 9 will likely result in increased housing activities in the City's single-family neighborhoods. These units are expected to be in the moderate and above moderate income levels.

### **Housing on Church Properties**

Throughout California, the development of affordable housing on religious properties has become an increasing trend. Nonprofit organizations such as Many Mansions and National CORE have assisted many religious facilities to incorporate housing on site.

The City identified four churches along Broadway that are currently zoned for RH (28 du/ac, however under the proposed General Plan allowed density will be 30 du/ac) and RM (17.5 du/ac) and have large parking areas. Under AB 1851 (Religious Facility Housing), these churches can partner with nonprofit developers to provide affordable housing on site and receive parking relief to facilitate development. These four churches (eight parcels) are identified to have the potential based on their residential zoning and amount of the property dedicated for parking. Each church site is larger than 0.5 acre. However, only a portion of the parking area for each church is used to estimate potential development as a conservative assumption. Because only affordable housing would qualify for the parking relief, these properties can potentially yield 28 affordable units, excluding density bonus. With density bonus, the number of units on site can potentially increase to over 50 units. For the church properties with smaller than 0.5 acre of parking area or are zoned R-3 (17.5 du/ac), this inventory conservatively assumes the affordable units at moderate income level. Only one church property zoned RH-2 (30 du/ac) and larger than 0.5 acre is assigned to the lower income level.

There has been significant expressed interest from church operations throughout Southern California to partner with nonprofit developers such as National CORE and Many Mansions to provide affordable housing onsite. Typical development model involves the church to provide a ground lease of the surplus or parking areas for affordable housing in exchange for lease



payments, new facility, and/or affordable units for staff. An action is included in the Housing Plan for the City to actively pursue such opportunities.

## Mixed Use Development

The proposed General Plan consolidates the existing MU-1 and MU-2 into MU-1, with a reduced density of 30 du/ac. MU-3 is renamed as MU-2 in the proposed General Plan with a density of 35 du/ac. To identify the underutilized properties in mixed use zones, the following criteria were used:

- Parcel is currently vacant; or
- If parcel is not vacant:
  - Land value is greater than improvement value
  - Structure was built prior to 1990 (and therefore over 30 years of age)
  - Existing uses are not national/regional chain operations or major anchor stores
  - Existing lot coverage based on aerial photo indicates large parking areas

In the MU areas, existing uses are primarily older commercial properties. Several old and non-conforming industrial uses are also present on the sites included in this inventory. In these zones, properties have realized developments at an average of 80 to 100 percent or above of the maximum allowed density. The two most recent mixed use projects - Legado in plan check stage and the completed Sea Breeze – achieved 100 percent of the allowable density. Therefore, using 80 percent of the achievable density in estimating potential is a conservative assumption. Furthermore, the City rarely experiences 100 percent nonresidential development in the mixed use areas.

A total of nine properties designated MU-1 totaling 7.61 acres are considered underutilized. Seven parcels larger than 0.5 acre each feasible for lower income can facilitate the development of 161 units. Two underutilized MU-1 parcels are less than 0.5 acre in size and can accommodate 22 moderate income units.

MU-2 properties are generally smaller in size. Eight underutilized MU-2 properties are identified with the potential for redevelopment. However, due to their small sizes, these parcels are assigned to the moderate income RHNA.

## Residential Overlay

The Proposed General Plan includes a Residential Overlay that will be applied to various areas, with the goal of dispersing new housing opportunities throughout the City. The Overlay is applied to existing older industrial and commercial uses that are ripe for redevelopment. The allowable density in the Overlay varies, depending on location.

### North Kingsdale (55 du/ac)

This area is comprised of 12 parcels that have already been or in process of being assembled by a property owner with the intention to redevelop the area into a mixed use project. Five of the parcels are currently zoned C-4, six parcels are currently zoned R-1, and one parcel is zoned R3. Under the proposed General Plan, the sites will be redesignated to C-4, consistent with the other

Kingsdale parcels described above). However, a Residential Overlay will be placed on these parcels, allowing the residential density to reach 55 du/ac. Combined, this area totals 2.38 acres. Discussions with the property owner indicates a plan to a mixed use project with ground floor office space and residential units above, along with various park and other amenities. The project is anticipated to produce a net increase of 125 units, including 15 percent of the units as lower income units. A similar vertical mixed use project, at a slightly larger scale, would be the Talaria in Burbank, CA.

### **North Tech District (55 du/ac)**

The North Tech District with Residential Overlay covers seven parcels totaling 15.4 acres. This area offers significant redevelopment potential. Existing uses include a mix of single story commercial, retail, auto-related uses, and restaurants, with large surface parking areas and outdoor storage. This area is located across the freeway adjacent to the Redondo Beach Station of the Metro Green Line, making this area ideal for transit-oriented development.

These parcels are currently zoned as IC-1 (Industrial-Commercial) and C-4 (Commercial). The proposed General Plan places a Residential Overlay on this area with a maximum density of 55 du/ac. The IC-1 allows a Floor Area Ratio (FAR) of 0.7 and C-4 allows a FAR of 1.0. However, current uses on these parcels average an existing FAR of only 0.29, substantially below the allowable intensity. Most of the building structures are at least 30 years old and some are over 40 years old. Existing conditions are ripe for redevelopment. While some of the uses include national brands, these are primarily independently owned franchises and not chain stores.

Zoning implementation of this Overlay is intended to facilitate a combination of different scenarios:

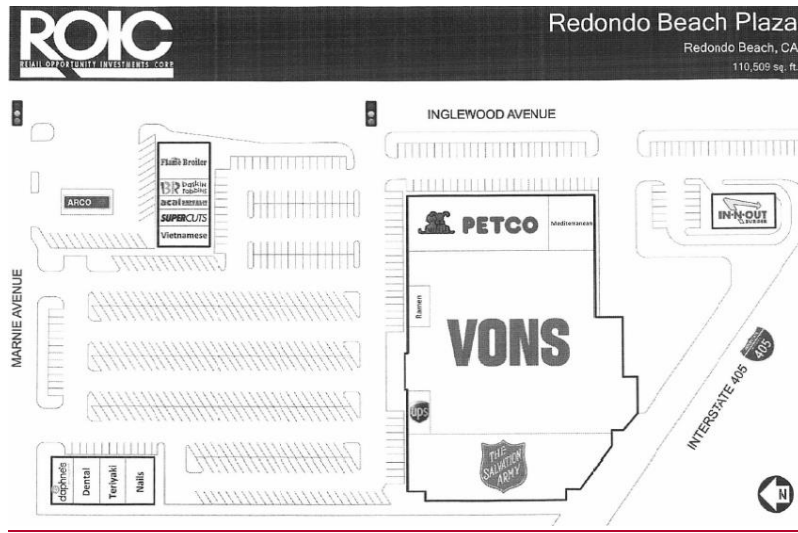
- Tear down and redevelopment;
- Develop the surface parking space while leaving the existing uses intact; and/or
- Reconfigure the existing structures and expand with residential uses.

The Zoning implementation will be designed to allow the achievement of the anticipated number of units in the Overlay under these scenarios.

Additionally, the City has engaged the property owners of the North Tech District and is confirming interest. To date the owner of the largest shopping center (Redondo Beach Plaza – 9.25 acres) within the North Tech District has communicated strong interest and experience with introducing high density residential to their commercial centers, citing recent examples of similar properties within Pinole and Novato in California and Bellevue in Washington. At 55 units per acre, this site can accommodate 354 units (inclusive of 70 lower income units, or 20 percent).

Figure H-3 provides description of why counting partial and why this is feasible for current owner to add residential. The owner of a large portion of this site has expressed interest in developing residential in addition to the existing vibrant uses on the site. They provided several examples of where they have worked on similar densification efforts that include residential. Below is an image of one of the examples.

**Figure H-3: Example of Shopping Center Redevelopment – Existing Site**



**Example of Shopping Center Redevelopment - Similar Site Proposal**



**190<sup>th</sup> Street (55 du/ac)**

The City has also identified two blocks of older industrial uses currently zoned I-2 along 190<sup>th</sup> street. The uses are a mix of light industrial uses with the structures mostly built during the 1950s and 1960s. These industrial areas are blighted and surrounded by multi-family residential uses, including a mobile home park. In general, typical commercial/industrial lease terms are about three to five years. These existing uses are not likely to have lease terms longer than industry standards. Furthermore, existing tenants are small private independent uses. Redevelopment of these areas would not involve any strategic decisions of major corporations.

The first block is comprised of four contiguous parcels with the oldest structure built more than 67 years ago and the newest structure 30 years ago. The four contiguous parcels can be consolidated into one or two projects. Only one parcel is less than 0.5 acre. Given the existing uses being incompatible with surrounding medium density residential uses, it would be appropriate to pursue projects that recycle the block into residential uses. The average FAR in this block is 0.50 when the General Plan allows the FAR at 1.0. The average Improvement-to-Land Value ratio is 0.60, indicating mostly these properties have not undergone significant improvements.

Another block of ten contiguous parcels zoned I-2 and developed primarily between 1950s and 1970s and occupied by small industrial and commercial uses has also been proposed in the General Plan to include a Residential Overlay. These ten contiguous parcels can be consolidated for development. While a few parcels are smaller than 0.5 acre, these parcels are of sizes that only require the consolidation of two parcels into adequately sized properties. Furthermore, three parcels are already under common ownership. Given the existing uses being incompatible with the surrounding medium density residential uses, it would be appropriate to pursue projects that would ultimately recycle the entire block into residential uses.

These properties are also surrounded by medium density residential uses and separated from the four parcels described above by a mobilehome park. With an allowable FAR of 1.0, this block is substantially underutilized with an existing FAR of only 0.36 and a current Improvement-to-Land Value ratio of 0.27, indicating the lack of significant improvements to the properties. As these aging industrial buildings are recycled, residential use becomes an appropriate use for the location.

The City has engaged with the property owners of these sites, some of which own multiple parcels. To date, the City has confirmed interest for future high-density residential development from multiple property owners in these two blocks. Specifically, a property owner of three Mary Ann Drive parcels expressed strong interest in selling the properties. Another owner of two parcels has been working on listing their properties for sale but must first pursue remediation due to existing use as a dry cleaner. The owner estimates remediation could be completed in 8 to 12 months. Another owner contiguous to the property owner of the three Mary Ann Drive parcels has engaged the City and confirmed his interest in joining with his neighbor and either developing their properties or listing them for sale.

City staff continues to engage existing property owners of all these sites to confirm their support/interest for future high density residential. Thus far, the City has received significant interest from the majority of these small parcels responding to the City's inquiry. Only one property owner has expressed no interest in selling in the near future. This parcel, Assessor's Parcel Number 4158010022, has been excluded in the calculation of potential within the overlay.

Farther along 190<sup>th</sup> Street toward the eastern end of the City, a 0.88-acre site currently zoned C-2 within a primarily medium density residential area. This property (18989 Hawthorne Boulevard, Lamp Plus site) is identified by the City to have potential for redevelopment due to its low existing FAR (large parking space), older commercial structure (40 years old), and occupied by an independent retail use. This property can potentially accommodate 39 units. The City



reached out to owner of 18989 Hawthorne Boulevard, who is receptive to the site being identified as a housing site with the potential for accommodating a mixed use project in the future.

**Figure H-4: Mixed Use Density Examples**



**Industrial Flex – South of Transit Center (55 du/ac)**

Located south of the Transit Center and the South Bay Galleria Mall (where a new 300-unit project has been approved) is a largely vacant industrial property zoned I-2. This area is mostly blighted and the parking on site does not support other off site uses. This area is designated Industrial Flex with a Residential Overlay. This area can accommodate 273 units at 80 percent of the maximum density. A similar mixed use project, at a slightly lesser density with different underlying non-residential uses, would be the Talaria in Burbank, CA (Figure H-5)

**Figure H-5: Talaria Development, Burbank, CA**



**Lot:** 3.86 acres; 168,141 sq. ft.  
**Height:** 5 stories  
**Commercial:** 43,000 sq. ft. Whole Foods  
 760-space parking garage  
 0.26 FAR for non-residential  
**Residential:** 241 dwelling units  
 62 dwelling units/acre  
 Constructed in 2009  
 LEED Gold Certified





**Figure H-7: South Bay Marketplace – Existing Site**



**Figure H-8: Mixed Use Example – Reuse of Parking Lot**



### **FedEx Area (55 du/ac)**

The current FedEx office on Pacific Coast Highway has recently closed. This parcel is adjacent to another retail use that has large surface parking and building area that appear to be significantly underutilized. These parcels are currently zoned MU-1. With a Residential Overlay of 55 units per acre, these parcels with a combined acreage of 1.82 acres can accommodate 80 units at 80 percent of the maximum density.

**Figure H-9: Mixed Use Density Examples**

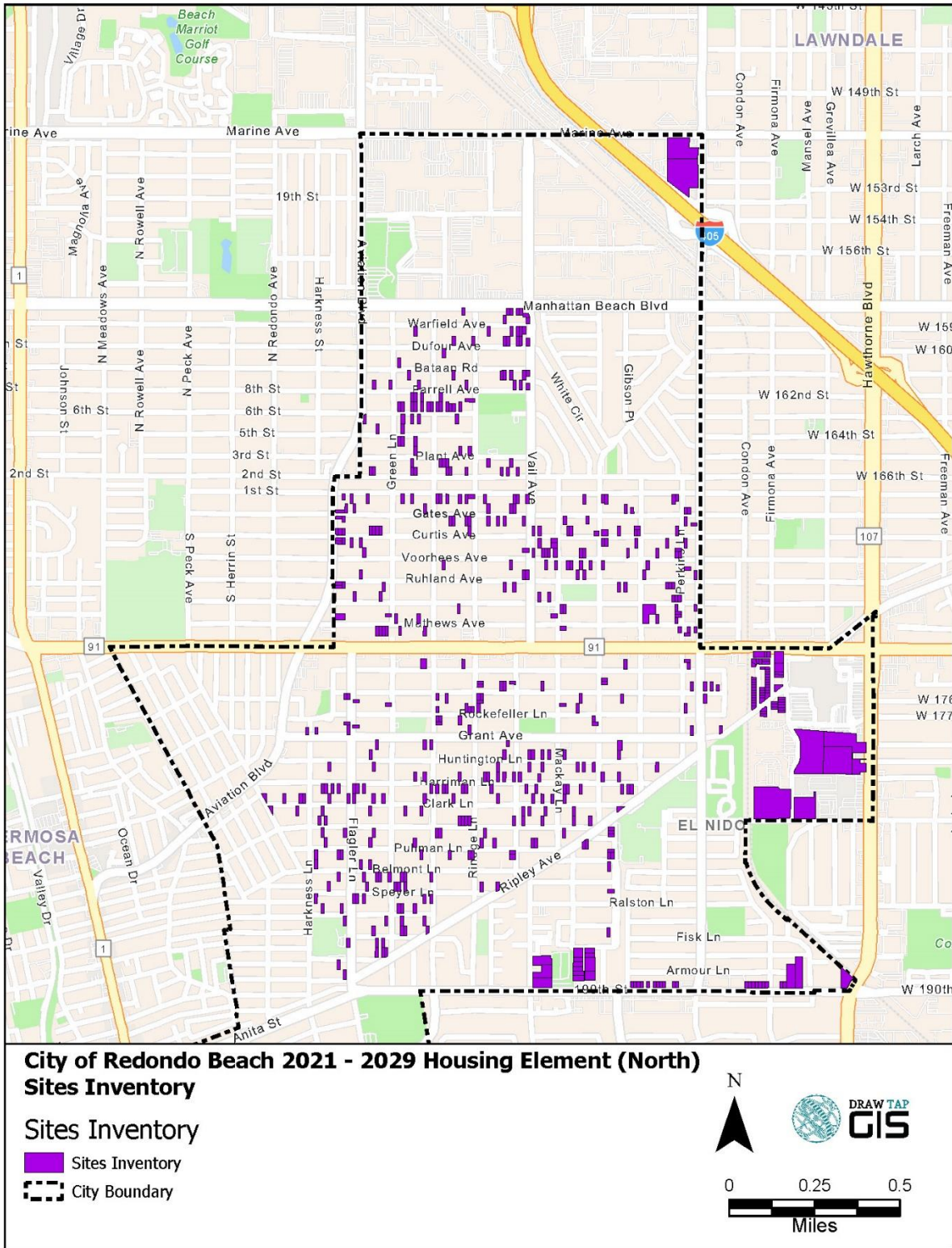


### **Summary of Sites Strategy**

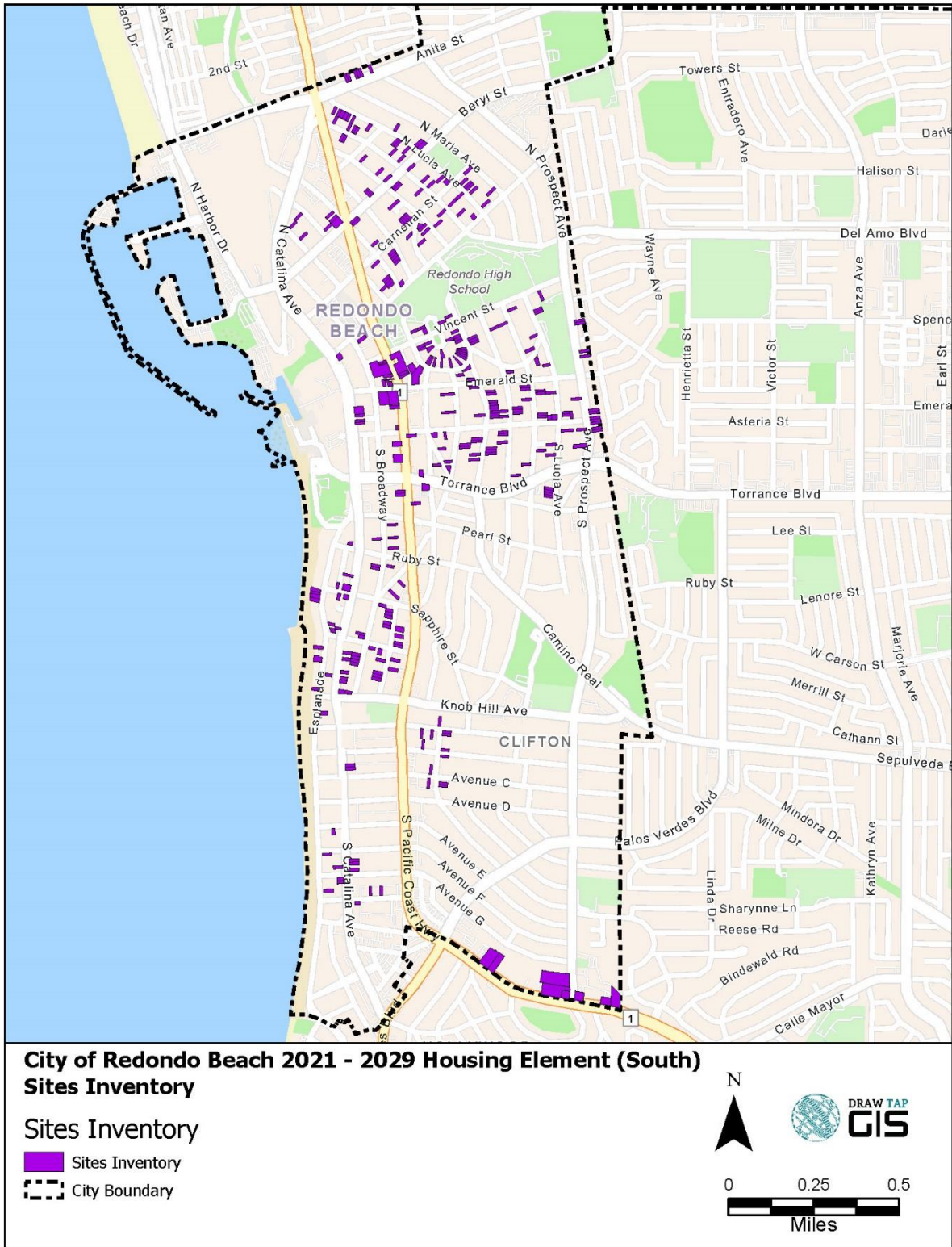
Through the General Plan update process, the City worked diligently to develop a strategy for the RHNA to provide a range of housing types and locational choices. [Table H-43](#) presents a summary of the strategy. The detailed sites inventory is presented in the appendix.



Figure H-10: Sites Inventory – North of 190th



**Figure H-11: Sites Inventory – South of 190th**



<b>Table H-43: Summary of Sites Strategy</b>				
	<b>Lower</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>Total</b>
<b>Sites Not Requiring Rezoning</b>				
<b>Residential Recycling</b>	<b>0</b>	<b>534</b>	<b>358</b>	<b>892</b>
R-2 (14.5 du/ac)	0	0	358	358
R-3/R-3A (17.5 du/ac), RMD (23.3 du/ac), RH (30 du/ac)	0	534	0	534
<b>Housing on Church Properties</b>	<b>12</b>	<b>26</b>	<b>0</b>	<b>38</b>
R-3 (17.5 du/ac)	0	26	0	26
RH (30 du/ac)	12	0	0	12
<b>Mixed Use</b>	<b>0</b>	<b>51</b>	<b>0</b>	<b>51</b>
MU-2 (35 du/ac)	0	51	0	51
<b>Subtotal</b>	<b>12</b>	<b>611</b>	<b>358</b>	<b>981</b>
<b>Sites Requiring Rezoning</b>				
<b>Residential Recycling</b>	<u>0</u>	<u>50</u>	<u>0</u>	<u>50</u>
RH (30 du/ac)	<u>0</u>	<u>50</u>	<u>0</u>	<u>50</u>
<b>Mixed Use</b>	<u>104</u>	<u>22</u>	<u>0</u>	<u>126</u>
MU-1 (30 du/ac)	<u>104</u>	<u>22</u>	<u>0</u>	<u>126</u>
<b>Residential Overlay</b>	<u>1,293</u>	<u>0</u>	<u>391</u>	<u>1,684</u>
<u>Kingsdale Residential Overlay (55 du/ac)</u>	<u>18</u>	<u>0</u>	<u>107</u>	<u>125</u>
<u>North Tech Residential Overlay (55 du/ac)</u>	<u>70</u>	<u>0</u>	<u>284</u>	<u>354</u>
<u>190th Street Residential Overlay (55 du/ac)</u>	<u>331</u>	<u>0</u>	<u>0</u>	<u>331</u>
<u>South of Transit Center Residential Overlay (55 du/ac)</u>	<u>273</u>	<u>0</u>	<u>0</u>	<u>273</u>
<u>South Bay Marketplace Residential Overlay (55 du/ac)</u>	<u>521</u>	<u>0</u>	<u>0</u>	<u>521</u>
<u>FedEx Residential Overlay (55 du/ac)</u>	<u>80</u>	<u>0</u>	<u>0</u>	<u>80</u>
<b>Subtotal</b>	<u>1,397</u>	<u>72</u>	<u>391</u>	<u>1,860</u>
<b>Summary of Sites</b>				
Remaining RHNA with Buffer (see <a href="#">Table H-42</a> )	<u>1,391</u>	<u>476</u>	<u>27</u>	<u>1,894</u>
Total Estimated Capacity	<u>1,409</u>	<u>683</u>	<u>749</u>	<u>2,841</u>
Meet RHNA with Buffer?	Yes	Yes	Yes	Yes

**Availability of Infrastructure and Services**

All sites identified in the inventory are located within urbanized neighborhoods and are served with water, sewer, and dry utilities available and accessible to accommodate the RHNA of 2,490 units. Dry utilities, including power (natural gas and electricity), telephone and/or cellular service, cable or satellite television systems, and internet or Wi-Fi service are available to all areas within the City.



## **B. Housing Resources**

### **1. Financial Resources**

With the elimination of redevelopment, Redondo Beach has limited funding for affordable housing activities.

#### **SB2 Grants**

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State's housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which establishes a \$75 recording fee on real estate documents to increase the supply of affordable homes in California. Because the number of real estate transactions recorded in each county will vary from year to year, the revenues collected will fluctuate.

For the first year of SB 2 funds availability as planning grants to local jurisdictions, the City of Redondo Beach received \$310,000 for planning efforts to facilitate housing production. The planned uses of the funds include:

- Objective design standards
- Specific plans and form-based codes
- ADU development and other innovative building strategies
- TOD strategies
- Innovative housing finance
- Expedited review
- CEQA streamlining

For the second year and onward, 70 percent of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants (CDBG). Based on HCD estimates, Redondo Beach is eligible for \$130,830 from the 2019 allocation and \$203,351 from the 2020 allocation.

#### **Community Development Block Grant (CDBG) Funds**

Through the CDBG program (administered by the City), the federal Department of Housing and Urban Development (HUD) provides funds to local governments for funding a wide range of community development activities for low income persons. The CDBG program is very flexible in that the funds can be used for a wide range of activities that meet HUD criteria. Eligible activities include: acquisition of real property, relocation and demolition; rehabilitation of residential and non-residential structures; public facilities and improvements; and public services.

The City of Redondo Beach is an entitlement jurisdiction eligible to receive CDBG funds directly from HUD on an annual basis. For Fiscal Year 2021, the City received approximately \$290,479 in CDBG funds. Funds will be spent on housing improvement assistance for low income households, public facility improvements, and public services.

## **Housing Choice Vouchers (Section 8) Rental Assistance**

The federal Housing Choice Voucher (HCV) program provides rental assistance to very low income households overpaying for housing. In general, the HCV program assists a very low income household by paying the difference between 30 percent of the gross household income and the cost of rent. As of 2021, in Redondo Beach, 437 families currently receive rental assistance under the HCV program, with another 4,500 households on the waiting list.

## **2. Administrative Resources**

The following agencies and organizations are important components of the City's housing services delivery system. These entities have the capacity to help construct, preserve, and improve housing in Redondo Beach, including preserving affordable housing that is at risk of converting to market-rate housing.

### **City of Redondo Beach Community Development Department**

The Community Department consists of the Planning Division and the Building and Safety Division. The Planning Division is primarily responsible for administering the City's long-range and current planning programs including overseeing development reviews and maintaining and updating the General Plan and Zoning Ordinance. The Building and Safety Division is responsible for ensuring the public's health, safety, and welfare, through the application and administration of the California Building, Fire, Plumbing, and Electrical Codes thereby enhancing the safety and quality of life in Redondo Beach through the enforcement and application of the City's Building Codes.

### **City of Redondo Beach Community Services Department**

The Community Services Department provides a wide variety of programs and services, including recreational programs and the management of the City's various parks and community facilities. The Department is also responsible for the administration of federal and state grants that provide housing services, job training and placement services, counseling for youth and parenting classes. Community Services runs the Redondo Beach Housing Authority and Community Development Block Grant programs. Redondo Beach is committed to promoting fair housing to the community. The Redondo Beach Housing Authority's mission statement is, "To enrich and improve the quality of life in Redondo Beach by providing excellent programs, opportunities, services, and facilities that meet the needs of the community."

All renters and home seekers are entitled to receive equal treatment, regardless of the following: race, color, religion, national origin, sex, marital status, familial status, or age. The City contracts with the Housing Rights Center (HRC) (formerly known as the Westside Fair Housing Council), a nonprofit organization that helps educate the public about fair housing laws and to investigate reported cases of housing discrimination. The HRC is a long-established organization, dedicated to promoting fair housing for all. The City offers the following programs:

- Dispute resolution services related to Landlord/Tenant issues in Redondo Beach. Free of charge.
- Fair housing workshops and informational brochures, in addition to HRC services.

- [Section 8 housing and Housing Choice voucher assistance.](#)
- [Homelessness services \(see “Addressing Homelessness” below\).](#)
- [Los Angeles Air Force Base Housing Program coordination.](#)
- [Resources index for connecting people with the assistance needed.](#)

## **Non-Profit Housing Developers**

Due to the high cost of housing development in Los Angeles County, many communities have found that partnerships with non-profit housing developers are an effective tool for creating affordable housing units. Nonprofit housing developers active in Southern California include:

- Habitat for Humanity
- National CORE
- Bridge Housing
- Meta Housing
- Jamboree Housing
- Linc Housing
- Many Mansions

## **3. Opportunities for Resource Conservation**

### **Regional Programs**

The South Bay Environmental Services Center (SBESC) is the South Bay's local clearinghouse for energy efficiency, water conservation and environmental information, training, materials, and outreach. SBESC assists public agencies including cities, schools, and special districts as well as businesses and residents of the South Bay to best utilize the many resources available to them through a wide variety of statewide and local energy efficiency and water conservation programs.

SBESC has expanded its services through its Energy Efficiency Plus (EE+) program to deliver significant and measurable energy savings by working directly with public agencies on joint procurement of energy efficient equipment as well as providing information on more energy efficient practices.

### **City Programs**

The City's strategy for conserving energy consists of three components:

- **Preparedness:** The City has developed an Electrical Power Interruption Plan in preparation of possible rolling blackouts.
- **Conservation:** The City encourages conservation through employee and public information. The City also established a Green Task Force to address the broad range of environmental issues facing the City. The Task Force reviews the City's existing environmental programs and recommends green policies and programs to the City Council.

- **Efficiency:** This is achieved through the implementation of new technology to reduce consumption and produce savings.

Energy-related housing costs can directly impact the affordability of housing. While State building code standards contain mandatory energy efficiency requirements for new development, the City and utility providers are also important resources to encourage and facilitate energy conservation and to help residents minimize energy-related expenses.

### **Utility Providers Programs**

Southern California Edison participates in the California Alternate Rates for Energy (CARE) program, which offers income-qualified customers a discount of 20 percent or more on their monthly electric bill. The Residential Multifamily Energy Efficiency Rebate Program offers property owners and managers incentives on a broad list of energy efficiency improvements in lighting, HVAC, insulation, and window categories. These improvements are to be used to retrofit existing multi-family properties of two or more units. Edison also operates the Energy Management Assistance (EMA) program, which helps income-qualified households conserve energy and reduce their electricity costs. Southern California Edison pays all the costs of purchasing and installing energy-efficient appliances and equipment, which are free to eligible customers. Services include weatherization, energy efficient lighting and cooling, and refrigerator replacement. And, finally, Edison has an Energy Assistance Fund (EAF), also known as the Rate Relief Assistance Program, designed to help low income customers pay their electric bills.

Additionally, the Southern California Gas Company offers various rebate programs for energy-efficient appliances to its customers. The Comprehensive Mobile Home Program provides qualifying mobile home customers with no-cost energy conservation evaluations, installations of low-flow showerheads and faucet aerators, and gas energy efficiency improvements, such as duct test and seal of HVAC systems. The Designed for Comfort program provides energy efficiency design assistance, training, and incentives for housing authorities, owners of multi-family affordable and supportive housing projects (which offer homes to persons with special needs).

A Direct Assistance Program (DAP) is available for qualified low-income customers. DAP provides no cost weatherization and furnace repair or replacement services. The Gas Company also operates the Gas Assistance Fund (GAF), which helps low-income households pay their gas bills. Southern California Gas participates in the state's CARE program, which provides a 20 percent discount on the monthly gas bills of income-eligible households. In addition, the Gas Company participates in the Medical Baseline Allowance Program. Customers with a qualifying medical condition are eligible for a free medical baseline allowance 0.822 therms per day. Under this program additional gas usage is billed at the baseline rate, which is the lowest rate for residential customers.

In addition to the assistance programs, residents may qualify for assistance through the Low-Income Home Energy Assistance Program (LIHEAP). LIHEAP is a federally funded energy assistance program that may help residents pay the utility bill if they are income-qualified. Funds pledged to assist customers of SoCalGas® are distributed through local community-based organizations, assistance agencies and certain government agencies.

## 2.2.5 Housing Plan

The City of Redondo Beach’s long-term housing goal is to provide housing that fulfills the diverse needs of the community. In the short term, this will be accomplished with the objectives, policies, and programs set forth in this Housing Plan. The goals, policies, and programs in the Plan build upon the identified housing needs in the community, constraints confronting the City, and resources available to address the housing needs, and will guide City housing policy through the 2021-2029 planning period.

Goals are statements of community desires which are broad in both purpose and aim, but are designed specifically to establish direction. Policies provide specific standards and/or end states for achieving a goal. Essentially, goals represent desired outcomes the City seeks to achieve through the implementation of policies. Further articulation of how the City will achieve the stated goals is found in the programs. Programs identify specific actions the City will undertake toward putting each goal and policy into action.

To make adequate provision for the housing needs of all economic segments of the community, the programs in the Housing Plan aim to:

- Conserve and improve the condition of the existing affordable housing stock;
- Assist in the development of housing for lower and moderate income households;
- Identify adequate sites to facilitate the development of a variety of types of housing for all income levels;
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing; and
- Promote housing opportunities for all persons.

[Table H-45](#) at the end of this section summarizes the City’s quantified objectives for the 2021-2029 planning period. Quantified objectives identified in particular programs are estimates of assistance the City will be able to offer, subject to available financial and administrative resources.

### **A. Conserve and Improve the Existing Housing Stock**

Conserving and improving the housing stock helps maintain investment in the community and keeps existing housing affordable. Because the majority of the housing stock is more than 40 years old (nearly 66 percent), significant rehabilitation needs are anticipated. A number of factors can cause residential units to become unsafe or unhealthy to live in. Preventing these problems from occurring and addressing them when they do occur protect the safety and welfare of the residents and assist in meeting housing needs throughout Redondo Beach. The City will focus its efforts on rehabilitation, code enforcement, and preserving existing affordable units to take a proactive approach to conserving the current housing stock.



**GOAL 1.0 Maintain and enhance the existing viable housing stock and neighborhoods within Redondo Beach.**

- Policy 1.1 Enforce adopted code requirements that set forth the acceptable health and safety standards for the occupancy of existing housing.
- Policy 1.2 Continue to offer assistance to low income households for emergency repairs and comply with the Mills act to encourage the maintenance and repair of the City’s historical structures.
- Policy 1.3 Work with property owners and nonprofit housing providers to preserve existing housing for low and moderate income households.
- Policy 1.4 Promote the use of energy conservation techniques and features in the rehabilitation of existing housing.

**Program 1: Mobility Access/Emergency Repair Program**

The Mobility Access/Emergency Repair Program provides a grant up to \$2,500 for special mobility access repairs for lower income disabled Redondo Beach homeowners (including those with developmental disabilities). Eligible repairs are those necessary to correct health and safety hazards. Repairs are restricted to electrical repairs, plumbing repairs, replacement of hot water heaters, and heating repair. Under the Mobility Access component, the program provides special repairs for disabled homeowners such as installation of grab bars and access ramps.

2021-2029 Objectives and Timeframe:

- Provide services to 10 lower income (including extremely low income) Redondo Beach homeowners each year for a total of 80 households.
- Promote program to residents through brochures at public counters and information on City website.
- Pursue State funds available for housing rehabilitation programs, including acquisition/rehabilitation.

Responsible Agency: Community Services Department

Funding Sources: CDBG funds

**Program 2: Preservation of Affordable Housing**

California Government Code Section 65583(a)(8) requires the Housing Element to include an analysis of existing assisted housing developments that are “at risk” (eligible to change from low-income housing to market-rate housing during the next ten years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use). Assisted housing developments are defined as multi-family rental housing that receives government assistance under federal, state and local funding programs. Assisted housing also includes multifamily rental units developed pursuant to a local inclusionary housing program, used to qualify for a density bonus, or other conditions for project approval such as development agreements.

Of the assisted housing developments listed in [Table H-29](#), two include units that are “at risk” of converting to market rents. One of the projects, Seaside Villa, is “at risk” due to potential

termination of Section 8 subsidy contracts. The second project, Seasons Senior Apartments, is “at-risk” due to the expiration of a 30-year covenant. As funding permits, the City will work to preserve the affordability of these units to maintain the stock of needed senior affordable housing in the community.

2021-2029 Objectives and Timeframe:

- Proactively engage the property owner and property manager of the Seasons Senior Apartments in 2022 (three year prior to potential eligibility for conversion) to provide education and ensure their understanding of their obligations under preservation law.
- Monitor the status of Seaside Villa and Seasons Senior Apartments annually.
- Ensure residents are notified by the property owner once a Notice of Intent to opt out of low income use is filed. Pursuant to new State law, notices must be sent out by property owners three years, one year, and six months prior to opting out.
- Contact nonprofit affordable housing providers with capacity to acquire and manage at-risk projects in Redondo Beach to explore preservation options if a Notice of Intent to opt out of low income use is filed.
- Support funding applications by qualified nonprofit affordable housing providers to pursue funding at the State and federal levels for preserving existing affordable housing.

Responsible Agency: Community Services Department

Funding Sources: State and federal funds as available

**B. Assist in the Development of Affordable Housing**

Providing affordable housing is essential for a healthy community. In addition to a diverse mix of housing types, it is necessary to make available housing for residents of all income levels. Seeking funding from varied sources increases the opportunities for development of affordable housing units.

Recognizing that homeownership plays a significant role in establishing strong neighborhoods and a sense of community pride, the City supports programs that make purchasing a home a realistic option for lower income households.

**GOAL 2.0 Assist in the provision of housing that meet the needs of all economic segments of the community.**

Policy 2.1 Facilitate homeownership opportunities for low and moderate income households.

Policy 2.2 Use density bonuses and other incentives to facilitate the development of new housing for lower and moderate income households, including extremely low income households.

Policy 2.3 Create collaborative partnerships with non-profit and for-profit developers to maximize resources available for the provision of housing affordable to lower income households.

- Policy 2.4 Address the housing needs of special populations and extremely low income households through emergency shelters, transitional housing, supportive housing, and single-room occupancy units.
- Policy 2.5 Promote the use of energy conservation features in the design of residential development to conserve natural resources and lower energy costs.

### **Program 3: Inclusionary Housing**

During the discussion of the General Plan and Housing Element Annual Report in 2020, the Redondo Beach City Council expressed interest in preparation of an Inclusionary Housing Ordinance. This type of ordinance requires a percentage of units to be restricted to certain levels of affordability in housing development projects meeting a set size threshold. There are several parameters that the City Council must decide upon, and once selected it is necessary to conduct a financial feasibility analysis to determine that the ordinance with those parameters would not preclude or deter market rate housing from being built. This is a necessary step to ensure that the ordinance is justifiable and in accordance with State housing laws.

During the procurement process for preparation of the 2021-2029 Housing Element, the City included a request for a quote to prepare an Inclusionary Housing Ordinance for Redondo Beach. On October 20, 2020, the City Council awarded a contract for the preparation of both the Housing Element and concurrently an Inclusionary Housing Ordinance.

In November 2020, the City's consultant provided an introductory presentation to City Council to go over the process of preparing an Inclusionary Housing Ordinance, including selection of parameters and conducting a financial analysis of proposed parameters. On January 12, 2021, the City Council proposed parameters and the consultant is finalizing the financial analysis to present to City Council in September 2021 to refine the parameters. The ordinance is expected to be introduced and adopted in early 2022.

2021-2029 Objectives and Timeframe:

- Pursue adoption of an inclusionary housing program by the spring 2022.

Responsible Agency: Community Development Department

Funding Sources: Departmental budget

### **Program 4: Housing Choice Voucher (Section 8) Program**

This program assists extremely low and very low income persons in securing decent, safe and sanitary, privately owned housing. Tenants select their own rental housing, within the program guidelines. The housing may be an apartment, a house, or a mobile home. In all instances, the unit must be clean, in good condition and safe. Also, the rent must not exceed the program limits (which vary based on unit size and type), and must be appropriately priced for the size, condition and location of the unit. The program is open to families and individuals; however, preference is given to families, elderly persons, and persons with disabilities. Eligible tenants pay 30 to 40 percent of their adjusted monthly income toward the rent and utilities. The City (using money appropriated by HUD) pays the remaining portion of the rent directly to the landlord on behalf of the tenant. The Redondo Beach Housing Authority administers the Housing Choice Voucher

program. The Redondo Beach Housing Authority provides rental subsidies to approximately 437 Voucher Program participants each month. As of 2020, there are currently 4,500 households on the waiting list.

2021-2029 Objectives and Timeframe:

- Continue to provide Housing Choice Voucher to extremely low and very low income households with the goal of increasing assistance to 633 households annually, consistent with the Housing Authority Five-Year Plan.
- Increase outreach and education on the State’s new Source of Income protections as required by SB 329 and SB 222. Both bills require all landlords to accept Housing Choice Vouchers, Veterans Affairs Supportive Housing (VASH), and other forms of public assistance as legitimate sources of income for rent payments.
- Annually, evaluate payment standards to ensure that consideration is given regarding local market conditions and rent reasonableness in an effort to increase voucher utilization.

Responsible Agency: Redondo Beach Housing Authority

Funding Sources: Section 8 funds

**Program 5: Response to Homelessness**

The City of Redondo Beach started a Response to Homelessness Pilot Program, approved by the Mayor and City Council, in June of 2019 as an enhanced response to the impact of homelessness, not only on people experiencing homeless, but also on residents and the community.

Homeless defendants represent a significant portion of criminal cases that the City prosecutor's office handles. Previous efforts had primarily focused on offering needed services to the homeless and providing a path forward out of homelessness. The pilot program included both a focus on the impact on residents and the local community, as well as making it easier for the homeless to accept the offered services and incentivizing them to do so. Essentially, the message has been if a misdemeanor defendant is willing to accept services and work with either PATH or the City’s housing navigator (with Harbor Interfaith Services), then their cases will be diverted and potentially dismissed.

In 2020 the City decided to continue and expanded the Response to Homelessness Program. One new branch of the Response to Homelessness Program is the Housing Initiative Court, known as Redondo Beach’s Homeless Court. This provides a local venue for addressing court cases related to those experiencing homelessness, to reduce the burden of transportation access to those defendants.

Another branch of the Response to Homelessness Program has been bridge housing. Bridge housing brings stabilization to people experiencing homelessness and helps them acclimate to a more structured lifestyle that will allow them to take the necessary steps towards permanent housing.

One part of that bridge housing is the Pallet Shelter housing that the City instituted in December of 2020. These Pallet Shelters are individual temporary homeless structures (15 structures total), currently located at 1521 Kingsdale Avenue in Redondo Beach on the lot where the City's Transit Center is being constructed in the northern part of the City. The Pallet Shelters were initially jointly funded for 6 months by the City of Redondo Beach and the County using Community Development Block Grant funds. On June 8, 2021, the City Council approved an amendment to the funding agreement with the County to continue to provide the shelters.

In addition to bridge housing, the City has officially supported the development of permanent supportive housing. The State of California established a program for funding for various housing projects through the Project Homekey program. Century Housing Corporation, a nonprofit housing development organization, is partnering with Los Angeles County as a co-applicant for funding to acquire and renovate a hotel site at 716 South Pacific Coast Highway in Redondo Beach for permanent supportive housing. On November 9, 2021, the Redondo Beach City Council voted unanimously to support the Homekey Round 2 application from the joint applicants of Century Housing Corporation and Los Angeles County to provide housing for those who are experiencing homelessness or at risk of becoming homeless. The application was submitted and supplemental information is being considered in early 2022. Once funding is obtained, the acquisition and remodeling can begin in 2022 to develop 20 units of affordable housing in the form of permanent supportive housing.

In April of 2021, the Redondo Beach Mayor and City Council voted to make the Response to Homelessness Program permanent, which includes key components such as the Housing Initiative Court and bridge housing like the Pallet Shelters. The approval also included funding for an additional housing navigator. The expectation is to keep the program under the administration of the City Attorney's Office for at least three years,

In addition, the City will continue to support and assist agencies that provide services for the homeless and persons with special needs. Specifically, the City has utilized CDBG funds for a range of services that benefit primarily extremely low and very low income households. These include:

- 1736 Family Crisis Center: Counseling for residents at risk of becoming homeless.
- First United Methodist Church Shared Bread Program: Meals, clothing, and hygienic supplies for the homeless.
- Salvation Army Meals on Wheels: Home delivered meals to seniors.
- St. Paul's United Methodist Church (Project Need): Meals and food pantry programs to assist the homeless.

2021-2029 Objectives and Timeframe:

- Continue to provide CDBG funding to agencies that operate emergency shelters, transitional housing, and supportive services for the homeless and persons with special needs.
- Before April 2024, evaluate the need and financial feasibility of continuing the Responses to Homelessness program.

Responsible Agency: Community Services Department

Funding Sources: CDBG funds

### **Program 6: Affordable Housing Development**

The City utilizes a variety of incentives to facilitate affordable housing development, including:

- Density bonuses;
- Deferral of development fees until the issuance of Certificates of Occupancy;
- Waiver of Quimby fees for affordable housing development;
- Additional fee subsidies, as funding permits; and
- Senior Housing Ordinance.

2021-2029 Objectives and Timeframe:

- Continue to promote the availability of incentives for affordable housing development on the City website.
- At least every other year, conduct an affordable housing meeting with affordable housing developers and invite proposals from interested developers. Coordinate discussions between affordable housing developers and church properties to promote affordable housing onsite. Support funding applications for projects that include a portion of the units as housing affordable to extremely low income households, especially those with special housing needs (such as seniors and persons with disabilities, including those with developmental disabilities), provided that the proposed projects are consistent with the City's General Plan and applicable specific plans.
- Pursue additional State (e.g. State funds for transit-oriented development and infrastructure improvements) and federal funding for affordable development. Annually check the websites of HUD, State HCD, and Los Angeles County Development Authority (LACDA) for potential funding sources and apply for eligible programs.
- Facilitate the development of 300 housing units affordable to lower income households through incentives, project conditions, development agreements, and/or other mechanisms.

Responsible Agency: Community Development Department

Funding Sources: State and federal funds as available

## **Program 7: Green Task Force**

The Green Task Force's Sustainable City Plan includes the following housing and building related recommendations:

- Green Building Incentives: Develop a set of incentives in the form of rebates, space offset programs, and recognition programs for green/sustainable building practices.
- Fee Structure: Balance fee structure to accommodate rebate incentives given for green homeowners, and builders.
- LEED Standards: Adopt LEED standards for all city buildings.
- Ordinance Update: Review and update ordinances to support LEED compliant measures.
- Staff Training: Train appropriate city staff and acquire LEED certification to eliminate need for hiring LEED consultants.
- Educational Plan: Implement an educational plan, including web access and distribution of green vendors and services, for all constituents - homeowners, developers, builders, Chamber of Commerce, regional networks, etc.

2021-2029 Objectives and Timeframe:

- Continue to promote and implement the policies outlined in the Sustainable City Plan, particularly those policies applicable to residential and mixed use developments.

Responsible Agency: City Council; Green Task Force; Community Services Department

Funding Sources: General funds

### **C. Provide Adequate Housing Sites**

A major element in meeting the housing needs of all segments of the community is the provision of adequate sites that can facilitate the development of all types, sizes and prices of housing. Households of different ages, types, incomes, and lifestyles have different housing needs and preferences that evolve over time and in response to changing life circumstances.

Providing an adequate supply and diversity of housing accommodates changing housing needs of residents. The Redondo Beach General Plan and Zoning Ordinance establish where housing may locate. To provide adequate housing and maximize use of limited land resources, new development should be constructed at appropriate densities that maximize the intended use of the land.

**GOAL 3.0 Provide suitable sites for housing development which can accommodate a range of housing by type, size, location, price, and tenure.**

- Policy 3.1 Implement land use policies that allow for a range of residential densities and products, including low-density single-family uses, moderate-density townhomes, and higher-density apartments, condominiums, and units in mixed-use developments.
- Policy 3.2 Encourage development of residential uses in strategic proximity to employment, recreational facilities, schools, neighborhood commercial areas, and transportation routes.
- Policy 3.3 Encourage transit-oriented developments near the Green Line station as a means of providing workforce housing, promoting use of public transit, and reducing energy consumption.
- Policy 3.4 Encourage compatible residential development in areas with recyclable or underutilized land.
- Policy 3.5 Allow flexibility within the City’s standards and regulations to encourage a variety of housing types.

**Program 8: Residential Sites Inventory and Monitoring of No Net Loss**

For the 6<sup>th</sup> cycle Housing Element, the City has been assigned a Regional Housing Needs Assessment (RHNA) of 2,490 units (936 very low income, 508 low income, 490 moderate income, and 556 above moderate income units). The City is updating its General Plan, with an anticipated adoption by November 2022 and put on the ballot for Measure DD public vote in March 2023.

As of [January 2022](#), the City has entitled [501](#) units and anticipates permitting 240 ADUs over eight years. The City’s progress in residential development leaves a remaining RHNA of [1,749](#) units ([841](#) very low income, 405 low income, 476 moderate income, and [27](#) above moderate income units).

To accommodate the remaining RHNA and to provide for a buffer for No Net Loss, the City has identified potential capacity for [981](#) units (12 lower income, [611](#) moderate income, and 358 above moderate income) on vacant/nonvacant sites in areas where the current land use designations would remain. In addition, potential capacity for [1,860](#) units ([1,397](#) lower income, [72](#) moderate income, and [391 above moderate income](#) units) could be accommodated on vacant/nonvacant sites in areas proposed with new General Plan land use designations (primarily through the [Residential](#) Overlays) that could accommodate residential development. [Table H-43](#) on page [96](#) outlines the designations and summary of estimated capacity on vacant/nonvacant sites in those proposed designations.

To ensure that the City monitor its compliance with SB 166 (No Net Loss), the City will develop a procedure to track:

- Unit count and income/affordability assumed on parcels included in the sites inventory.



- Actual units constructed and income/affordability when parcels are developed.
- Net change in capacity and summary of remaining capacity in meeting remaining Regional Housing Needs Allocation (RHNA).

Pursuant to SB 166, the No Net Loss requirements are:

- Make findings at the time of project approval regarding any site in the Housing Element sites inventory (must be implemented immediately);
- Identify or rezone sufficient, adequate sites within 180 days of project approval to accommodate any shortfall; and
- Acknowledge projects may not be denied solely because No Net Loss would require rezoning.

2021-2029 Objectives and Timeframe:

- Adopt the Recommended Land Use Plan that provides increased residential development capacity by November 2022. Specifically, ensure that the updated General Plan offer adequate capacity for at least 1,860 units, with 1,397 lower income units to be accommodated through the Residential Overlays that establish a minimum density of 20 units per acre and a maximum density of 55 units per acre. Specifically, the RHNA sites will meet the following criteria:
  - Permit owner-occupied and rental multi-family use by right for developments in which 20 percent or more of the units are affordable to lower income households (see Program 9).
  - Accommodate a minimum of 16 units per site (see Program 11 for facilitating lot consolidation of smaller parcels into sites of at least 0.5 acre).
  - Require a minimum density of 20 units per acre.
  - At least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low income housing need, if those sites allow 100 percent residential use, and require residential use occupy 50 percent of the total floor area of a mixed-use project.
- Update the Zoning Ordinance by November 2023 to implement the updated General Plan. Specifically for the North Tech and South Bay Marketplace Residential Overlays, establish development standards and regulations that would facilitate a combination of different scenarios to allow achievement of the anticipated number of units:
  - Tear down and redevelopment;
  - Develop the surface parking space while leaving the existing uses intact; and/or
  - Reconfigure the existing structures and expand with residential uses.
- Amend, if necessary, the Harbor/Civic Center Specific Plan by November 2023 to ensure consistency in allowable density in the RH properties (increasing from 28 du/ac to 30 du/ac).
- Develop a procedure in 2022 to monitor the development of vacant and nonvacant sites in the sites inventory and ensure adequate sites are available to meet the remaining RHNA

by income category. This will include monitoring development in multi-family zones. If multi-family properties are developed with single-family use (as currently permitted by the Zoning Ordinance) to the extent that would jeopardize the City's ability in meeting its RHNA, the City will implement mitigation measures.

- Provide information on available sites and development incentives to interested developers and property owners on City website.
- Because rezoning even for No Net Loss requirement is subject to voter approval, the City will monitor and anticipate any No Net Loss with a trend projection at least two years in advance to anticipate shortfall in sites and ensure adherence to the 180-day requirement.

Responsible Agency: Community Development Department

Funding Sources: Departmental budget

### **Program 9: By-Right Approval for Projects with 20 Percent Affordable Units**

Pursuant to AB 1397 passed in 2017, the City will amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower income households, on sites being used to meet the 6th cycle RHNA that meet the following:

- Reusing of nonvacant sites previously identified in the 5th cycle Housing Element (see Appendix B).
- Rezoning of sites where the rezoning occurs pass the October 15, 2021 statutory deadline.

By-right means that the City review must not require conditional use permit, planned unit development permit, or other discretionary review or approval.

2021-2029 Objectives and Timeframe:

- Amend Zoning Ordinance to provide by-right approval pursuant to AB 1397 within one year of Housing Element adoption.

Responsible Agency: Community Development Department

Funding Sources: Departmental budget

### **Program 10: Replacement Housing**

Development on nonvacant sites with existing residential units is subject to replacement requirement, pursuant to AB 1397. The City will amend the Zoning Code to require the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in State Density Bonus Law.

2021-2029 Objectives and Timeframe:

- Amend Zoning Ordinance to address replacement requirement pursuant to AB 1397 within one year of Housing Element adoption.

Responsible Agency: Community Development Department

Funding Sources: Departmental budget

### **Program 11: Small Lot Development/Lot Consolidation**

This residential sites inventory for the 6<sup>th</sup> cycle RHNA focuses primarily on sites that are larger than 0.5 acres (see Appendix B). However, some parcels are small and owned by individual owners. Given the City's highly urbanized character, small infill projects would be an appropriate and feasible development pattern to accommodate these housing units in the community, as demonstrated by the City's current trend. The City will develop appropriate incentives and development standards to facilitate lot consolidation for affordable housing development.

2021-2029 Objectives and Timeframe:

- By October 2022, develop appropriate incentives, development standards (such as reduced minimum lot size), and review procedures to facilitate small lot development and lot consolidation for affordable housing development. Incentives for lot consolidation may include:
  - Over the counter lot line adjustments if not combined with other applications; concurrent review if combined with other applications
  - Expedited review process
  - Deferral or waiver of fees for affordable housing project
  - Lot consolidation bonus (potentially in density, setbacks, or other incentives)
- Ongoing outreach to property owners regarding lot consolidation incentives.
- Facilitate lot consolidation by assisting interested developers in identifying feasible sites.

Responsible Agency: Community Development Department

Funding Sources: Departmental budget

### **Program 12: Accessory Dwelling Units (ADUs)**

The City is in the process of updating the existing Residential Design Guidelines to include Accessory Dwelling Units. The guidelines were adopted by the City of Redondo Beach on October 7, 2003. The design guidelines are intended to inform the public about development opportunities within the residential zones, including both single and multi-family structures. The update will also include the R-1A residential zone which was not included in the original document.

With the addition of ADUs and the R-1A Zone to the guidelines, the document will span the breadth of residential infill opportunities available within the City. With this update, owners in all residential zones will have a better understanding regarding the development potential of their properties. The guidelines will also include design templates for ADU configurations that are approvable by-right, subject to the existing conditions of the lot.

As a part of this exercise, new handout sheets will be created for easy application of the standards. By better informing the public, ADU applicants will have the tools to submit a successful application, thus reducing administrative review time. It is estimated that the ADU

guidelines will reduce Planning review time in half from 8 weeks down to 4 weeks. Conversely, the City expects that permitting will double from 20-30 permits issued in 2019 and 2020 to an estimated 35-50 permits after the guidelines are updated.

The City received an SB-2 Grant award from the State HCD for this work, and the deadline for completion is December 2022. The City awarded the contract for the consultant to prepare the design guidelines in June 2021 and the work is underway.

2021-2029 Objectives and Timeframe:

- Facilitate the development of 240 ADUs over eight years.
- Update the Residential Design Guidelines (with ADU pre-approved plans) and develop handout materials and application form for ADU by December 2022.
- In 2023, develop mechanisms to facilitate ADUs, especially ADUs that may be deed restricted as affordable housing. These may include reduced fees, rehabilitation assistance, or relaxed development standards as feasible and appropriate in exchange for affordability.
- In 2025, monitor the ADU development trend to ensure the City is meeting its projection goal. If necessary, the City will make adjustment to its incentives for ADU construction.

Responsible Agency: Community Development Department

Funding Sources: SB-2

#### **D. Remove Governmental Constraints**

Pursuant to State law, the City is obligated to address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. Removing constraints on housing development can help address housing needs in the City by expediting construction, and lowering development costs.

#### **GOAL 4.0 Mitigate any potential governmental constraints to housing production and affordability.**

Policy 4.1 Review and adjust as appropriate residential development standards, regulations, ordinances, departmental processing procedures, and residential fees related to rehabilitation and construction that are determined to be a constraint on the development of housing, particularly housing for lower and moderate income households and for persons with special needs.

Policy 4.2 Ensure that water and sewer service providers prioritize service allocations to affordable housing projects, pursuant to State law.

## **Program 13: Amendments to the Zoning Ordinance**

The City will be updating its Zoning Ordinance to implement the new General Plan. As part of that Zoning Ordinance update, the following topics will be addressed:

**Density Bonus:** The State density bonus law has been amended numerous times in recent years, including the following:

- AB 1763 (Density Bonus for 100 Percent Affordable Housing) – Density bonus and increased incentives for 100 percent affordable housing projects for lower income households.
- SB 1227 (Density Bonus for Student Housing) - Density bonus for student housing development for students enrolled at a full-time college, and to establish prioritization for students experiencing homelessness.
- AB 2345 (Increase Maximum Allowable Density) - Revised the requirements for receiving concessions and incentives, and the maximum density bonus provided.

**Transitional and Supportive Housing (SB 2, SB 745, and AB 2162):** Pursuant to SB 2 and SB 745, transitional and supportive housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City will amend the Zoning Ordinance to define transitional and supportive housing pursuant to California Government Code Sections 65582(f),(g), and (h) and to permit transitional and supportive housing in all zones where residential uses are permitted, subject to the same development standards and permitting processes as the same type of housing in the same zone.

AB 2162 requires that permanent supportive housing project of up to 50 units be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions, such as providing a specified amount of floor area for supportive services. The bills also prohibit minimum parking requirements for supportive housing within ½ mile of a public transit stop.

**Emergency Shelters (AB 139):** This bill requires local jurisdictions to amend its zoning provisions for emergency shelters, establishing parking requirements based on staffing level only.

**Low Barrier Navigation Center (AB 101):** This bill requires local jurisdictions establish provisions for Low Barrier Navigation Centers (LBNC) as development by right in areas zoned for nonresidential zones (including mixed use zones as required by law) permitting multi-family uses if it meets specified requirements. A “Low Barrier Navigation Center” is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.”

**Affordable Housing Streamlined Approval (SB 35):** The City will establish a streamlined, ministerial review process for qualifying multi-family residential projects.

**Single Room Occupancy (SRO) Housing:** The Redondo Beach Zoning Ordinance does not contain specific provisions for SRO units. The Zoning Ordinance is in the process of being amended to specifically address the provision of SRO units as a conditionally permitted use in the C-4 zone outside the Coastal Zone.

**Employee Housing:** The City will amend the Zoning Ordinance to address the provision of employee housing for six or fewer employees as a regular residential use.

**Reasonable Accommodation:** The City of Redondo Beach does not currently have a formal ministerial process for persons with disabilities to seek relief from the strict or literal application of development standards to enable them to enjoy their dwellings like other residents in the City. Decisions are currently made on a case-by-case basis.

The City will amend the Zoning Ordinance to provide a formal process for providing reasonable accommodation to persons with disabilities. The process will be available to a person, a business, or organization making a written request for reasonable accommodation in the application of land use or zoning provisions in order to facilitate the development of housing for persons with disabilities. The request will be reviewed and determined by the Community Development Director or his designee.

**Definition of Family:** The City's Zoning Ordinance contains a definition of family that may be considered restrictive. The City will amend the Ordinance to either remove the definition or adopt an inclusive definition that complies with State and Federal fair housing laws.

**Parking Requirements:** The City requires two parking spaces per unit regardless of unit size. This parking requirement can potentially discourage the development of small units. The City will address the parking requirements as part of the City's General Plan Land Use Element update. The City will amend the parking standards to reduce the burden on multi-family residential development, including adjusting the number and type of parking spaces required.

**Unlicensed Group Homes:** Not all residential care facilities/group homes are required to be licensed by the State Department of Social Services. The City will address assess the types of housing that may fall into this category and as part of the comprehensive Zoning Ordinance update, address the provision of group homes that are not required to be licensed.

**Conditional Use Permit:** Currently, multi-family development of four or more units requires the approval of a Conditional Use Permit (CUP). This CUP requirement potentially adds time and uncertainty to multi-family development. The City will revise its CUP requirement for multi-family development with the following changes:

- 15 Raise the threshold of administrative review to multi-family development up to 15 units (consistent with the inclusionary housing threshold as proposed).
- For projects above 15 units, utilize a development review process that focuses on site plan and design reviews by the Planning Commission.

2021-2029 Objectives and Timeframe:

- Complete Zoning Ordinance amendments outlined above to expand the variety of housing types and remove governmental constraints according to the following priority:
  - By the end of 2022:
    - Density Bonus
    - Transitional and Supportive Housing
    - Emergency Shelter
    - Low Barrier Navigation Center
    - Employee Housing
    - Reasonable Accommodation
    - Definition of Family
  - By November 2023 as part of the Zoning Ordinance update to implement the updated General Plan.
    - Affordable Housing Streamlined Approval
    - Single Room Occupancy Housing
    - Parking Requirements
    - Unlicensed Group Homes
    - Conditional Use Permit
- Annually review the Zoning Ordinance for compliance with State law and to identify potential constraints and amend the Zoning Ordinance as necessary.

Responsible Agency: Community Development Department

Funding Sources: Departmental budget

### **Program 14: Objective Design Standards**

The City is in the process of updating the existing Residential Design Guidelines with objective design standards and to inform the public about development opportunities within the residential zones, including both single and multi-family structures.

2021-2029 Objectives and Timeframe:

- Develop objective design standards through the Residential Design Guidelines update by the end of 2022.
- Develop objective design standards for the four Residential Overlay districts (North Kingsdale, North Tech, 190<sup>th</sup> Street, and Industrial Flex-South of Transit Center, [South Bay Marketplace, and FedEx](#)) by October 15, 2024. The standards must accommodate development at the maximum densities allowed in each district without assuming the use of concessions, incentives, or waivers allowed pursuant to State Density Bonus Law.

Responsible Agency: Community Development Department

Funding Sources: Departmental funds

## **Program 15: Monitoring the Effect of Article 27 of the City Charter (Measure DD)**

The voter-initiated Measure DD requires voters' approval for any major change in land use. The Recommended Land Use Plan of the General Plan Update proposes new land use designations that represent significant changes in land use, and therefore requires voters' approval. The General Plan Update will be placed on the ballot by November 2022. Article 27 of the City Charter (Measure DD) is considered by the State Department of Housing and Community Development (HCD) as a potential constraint to the supply of land for residential development. In the event that the electorate rejects the ballot measure for the Preferred Land use Plan, the City must take additional action to achieve Housing Element compliance.

### 2021-2029 Objectives and Timeframe:

- Given the statutory requirement to encourage a variety of housing type, the City will continue its outreach and education to help the community understand the importance of the General Plan update in compliance with State law and the consequence of noncompliance.
- Monitor court cases concerning zoning requiring a public vote and consider adjusting provisions of the City's Charter (Measure DD) as necessary per court decisions.
- Continue to implement the housing programs in this 2021-2029 Housing Element that are not contingent upon voter approval to provide affordable housing opportunities and to affirmatively further fair housing.

Responsible Agency: Community Development Department

Funding Sources: Departmental funds

## **E. Provide Equal Housing Opportunities**

To meet the housing needs of all segments of the community, the Housing Plan includes a program to promote housing opportunities for all persons regardless of their special characteristics as protected under State and federal fair housing laws.

### **GOAL 5.0 Continue to promote equal housing opportunity in the City's housing market.**

- Policy 5.1 Provide fair housing services to Redondo Beach residents, landlords, and housing providers, and ensure that they are aware of their rights and responsibilities regarding fair housing.
- Policy 5.2 Provide equal access to housing for special needs residents such as the homeless, elderly, and disabled.
- Policy 5.3 Promote the provisions of disabled-accessible units and housing for mentally and physically disabled.



## Program 16: Fair Housing Program

The City contracts with the Housing Rights Center to educate the public about fair housing laws and to investigate reported cases of housing discrimination. The Housing Rights Center (HRC) is a long-established organization, dedicated to promoting fair housing for all persons. HRC provides telephone and in-person counseling to both tenants and landlords regarding their respective rights and responsibilities under California and federal laws, as well as City ordinances. HRC has also established an effective and comprehensive outreach and education program. The organization develops and distributes written materials that describe the applicable laws that protect against housing discrimination and ways to prevent housing injustices. Additionally, HRC presents fair housing law workshops and programs to teach communities how to stop housing inequity and investigates housing discrimination complaints brought under both State and Federal fair housing laws.

To affirmatively further fair housing, the City will undertake a series of actions to facilitate a variety of housing opportunities to accommodate the diverse needs of the community. Actions to affirmatively further fair housing are summarized in [Table H-44](#).

### 2021-2029 Objectives and Timeframe:

- Continue to contract with a fair housing service provider to provide fair housing and tenant/landlord services.
- Promote fair housing awareness in City newsletter and website.

Responsible Agency: Housing Rights Center (or other contracted service providers)

Funding Sources: CDBG funds

<b>Fair Housing Issue</b>	<b>Contributing Factors and Priority</b>	<b>Meaningful Action</b>
Insufficient and Inaccessible Outreach and Enforcement	<ul style="list-style-type: none"> <li>• Lack of a variety of inputs media (e.g., meetings, surveys, interviews)</li> <li>• Lack of accessibility to draft documents</li> <li>• Lack of digital access</li> <li>• Lack of accessible forums (e.g., webcast, effective communication, reasonable accommodation procedures)</li> <li>• Lack of local public fair housing enforcement</li> </ul>	<p>Beginning with the FY 2022 program year, redesign the scope of work for fair housing provider to:</p> <ul style="list-style-type: none"> <li>• Require evidence of effective outreach from the City's fair housing provider. City will require attendance reports to events from fair housing providers. Based on reports, work with fair housing provider on plan to increase attendance to outreach events.</li> <li>• Expand outreach and education to landlords on source of income discrimination and protection. Create an outreach plan by the end of 2022 to educate local landlords with at least one outreach event annually.</li> </ul>

<b>Table H-44: Fair Housing Issues, Contributing Factors, and Meaningful Actions</b>		
<b>Fair Housing Issue</b>	<b>Contributing Factors and Priority</b>	<b>Meaningful Action</b>
		<p>Beginning FY 2022, require City staff who provide housing related services to attend fair housing training at least every other year.</p> <p>Utilize multimedia outreach and make the following updates by the end of 2022:</p> <ul style="list-style-type: none"> <li>• Make information available to all on the City's website regarding community meetings and information on fair housing services</li> <li>• Provide all outreach and fair housing information in the two languages most spoken by City residents.</li> <li>• Survey residents for feedback on effective communication procedures and what is most beneficial for residents when it comes to outreach activities and accessing information.</li> </ul>
Segregation and Integration	<ul style="list-style-type: none"> <li>• Displacement of resident due to economic pressures</li> <li>• Location and type of affordable housing</li> <li>• Lack of supportive housing in community-based settings</li> </ul>	<p>Prioritize use of City grant funds to incentivize/partner with developers to pursue affordable housing in the Mixed Use and Housing Overlays, with the goal of achieving 100 lower income and 100 moderate income units over eight years.</p> <p>By the end of 2022 analyze current permit streamlining, fees, and incentives available and then make improvements that will increase affordable housing in the City's high opportunity areas (Housing Overlays and Mixed Use areas).</p> <p>Work with the City's Code Enforcement to develop a proactive enforcement program in 2023 that will:</p> <ul style="list-style-type: none"> <li>• Target areas of concentrated rehabilitation needs</li> <li>• Assist in the repairs and mitigate potential costs associated with rehabilitation</li> <li>• Reduce the displacement of residents through rehabilitation</li> <li>• Pursue funding at the State level to expand housing rehabilitation assistance.</li> </ul>
Disproportionate Housing Needs, Including Displacement Risks	<ul style="list-style-type: none"> <li>• The availability of affordable units in a range of sizes</li> <li>• Displacement of residents due to economic pressures</li> <li>• Lack of private rental relief programs for people at risk of homelessness</li> </ul>	<p>Require a replacement requirement in transit corridors or on sites identified to accommodate the housing needs of lower income households starting in 2022.</p> <ul style="list-style-type: none"> <li>• If this proves to be unfeasible in the timeframe, on an annual basis thereafter, continue to assess a</li> </ul>

**Table H-44: Fair Housing Issues, Contributing Factors, and Meaningful Actions**

Fair Housing Issue	Contributing Factors and Priority	Meaningful Action
		<p>replacement requirement and give justification as to why it is or is not required.</p> <p>Continue to enforce the City's condominium conversion restrictions.</p> <p>By the end of 2023, create policies to support the creation of new affordable housing opportunities through the conversion of existing poor performing motel properties to Single Room Occupancy (SRO) Lodging as appropriate.</p> <p>Continue to utilize the Artesia &amp; Aviation Corridor Area Plan (AACAP) to assist small businesses.</p> <p>Encourage residents in neighborhoods with disproportionate housing needs to actively be involved in the City's decision-making process by advertising available opportunities on the City's website. Provide information on the City's website about these opportunities by the end of 2022, including participation in boards and commissions involved in neighborhood improvements:</p> <ul style="list-style-type: none"> <li>• Housing Authority</li> <li>• Planning Commission</li> <li>• Preservation Commission</li> <li>• Public Safety Commission</li> <li>• Public Works Commission</li> <li>• Recreation &amp; Parks Commission</li> <li>• Youth Commission</li> </ul>
<p>Mobility and Access to Opportunity</p>	<ul style="list-style-type: none"> <li>• Location and type of affordable housing</li> <li>• Lack of regional cooperation</li> <li>• Land use and zoning laws</li> </ul>	<p>Work with local jurisdictions and the City's Fair Housing provider to provide a regional affordable rental registry accessible on multiple platforms by the end of 2022.</p> <ul style="list-style-type: none"> <li>• If this proves to be unfeasible in the timeframe, work solely with the City's Fair Housing provider to update annually and provide an affordable rental registry for Redondo Beach residents.</li> </ul> <p>Continue to engage with market-rate developers to include affordable units.</p>

<b>Table H-44: Fair Housing Issues, Contributing Factors, and Meaningful Actions</b>		
<b>Fair Housing Issue</b>	<b>Contributing Factors and Priority</b>	<b>Meaningful Action</b>
		By 2022, adopt an inclusionary housing program that will extend requirements to both ownership and rental housing.

**F. Summary of Quantified Objectives**

<b>Table H-45: Summary of Quantified Objectives (2021-2029)</b>						
	<b>Extremely Low</b>	<b>Very Low</b>	<b>Low</b>	<b>Moderate</b>	<b>Above Moderate</b>	<b>Total</b>
New Construction	20	30	50	100	500	700
ADU Construction	5	36	103	14	82	240
Rehabilitation	0	40	40	0	0	80
Section 8	316	317	0	0	0	633
Preservation of At-Risk Units	10	30	30	0	0	70

## Appendix A: Review of Past Accomplishments

The City’s accomplishments in implementing the fifth cycle (2013-2021) Housing Element are summarized in this Appendix.

**Effectiveness in Addressing Special Needs:** With limited funding, the City had to discontinue its Deferred Payment Loan and Handyperson programs. Prior to its discontinuation, the Handyperson program benefitted many senior households. With limited, funding, the Mobility Access/Emergency Repair program is the only remaining rehabilitation assistance program offered by the City. This program primarily benefits seniors and disabled households. The City will pursue additional funding in the future to assist with housing rehabilitation.

The City also utilizes VASH vouchers to house veterans. CDBG funds are also used to assist the homeless. Specifically, the City partnered with the County of Los Angeles to set up a site for pallet shelters, with funding commitments to operate the shelters through June 2022 and an option to extend and expand the operation in the future.

Nevertheless, the extent of special needs in the City far exceeds the City’s funding capacity. The City will continue to pursue additional funding opportunities in the upcoming years.

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
<b>GOAL 1.0: Maintain and enhance the existing viable housing stock and neighborhoods within Redondo Beach.</b>		
<b>Program 1:</b> Deferred Payment Loan Program	<ul style="list-style-type: none"> <li>Annually check the websites of the U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development (HCD) and/or contact staff for potential funding sources and as appropriate apply for eligible programs.</li> <li>As part of the City's Consolidated Plan update, consider the use of CDBG funds as a source of funding for this program.</li> </ul>	<p><b>Effectiveness:</b> Following the dissolution of redevelopment and annual funding reductions from HUD, the City no longer offers deferred loans. There are a number of active loans from the Loan Program ongoing and as those properties are involved in transactions, the loans are repaid to the City. However, these repayments are not adequate to sustain a viable program.</p> <p><b>Continued Appropriateness:</b> The City will pursue other funding sources for this activity for housing rehabilitation assistance.</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
<p><b>Program 2:</b> Handyperson Program</p>	<ul style="list-style-type: none"> <li>• Annually check the websites of the U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development (HCD) and/or contact staff for potential funding sources and apply for eligible programs.</li> <li>• As part of the City's Consolidated Plan update, consider the use of CDBG funds as a source of funding for this program.</li> </ul>	<p><b>Effectiveness:</b> The City refers handyperson inquiries to local social service and faith-based organizations that periodically provide support to qualifying households in need. The City continues to provide services under the Mobility Access and Emergency Repair Program.</p> <p><b>Continued Appropriateness:</b> The City will pursue other funding sources for this activity for housing rehabilitation assistance.</p>
<p><b>Program 3:</b> Mobility Access/Emergency Repair Program</p>	<ul style="list-style-type: none"> <li>• Provide services to 10 lower income (including extremely low income) Redondo Beach homeowners each year for a total of 60 households (15 households annually).</li> <li>• Promote program to residents through brochures at public counters and information on City website</li> </ul>	<p><b>Effectiveness:</b> During the 2013-2021 Housing Element period, the City to date has successfully provided assistance to approximately 70 very low- and low-income households under the Mobility Access/Emergency Repair Program using CDBG funds.</p> <p><b>Continued Appropriateness:</b> This program continues to be appropriate and is included in the 2021-2029 Housing Element Update.</p>
<p><b>Program 4:</b> Preservation of Affordable Housing at Risk of Converting to Market Rate</p>	<ul style="list-style-type: none"> <li>• Monitor the status of Seaside Villa and Heritage Pointe annually.</li> <li>• Ensure residents are notified by the property owner once a Notice of Intent to opt out of the Section 8 contract is filed.</li> <li>• Contact nonprofit developers with capacity to acquire and manage at-risk projects in Redondo Beach to explore preservation options if a Notice of Intent to opt out of the Section 8 contract is filed.</li> <li>• Support funding applications by qualified nonprofit developers to pursue funding at the State and federal levels for preserving existing affordable housing.</li> </ul>	<p><b>Effectiveness:</b> Opting out of the Section 8 program requires a three-year notice to the tenants. Seaside Villa has opted to enter into a new 5-year contract with HUD for their continued participation in the HUD funded Section 8 program. However, two projects that had affordability covenants due to density bonus and development agreements are no longer deed restricted as affordable housing.</p> <p><b>Continued Appropriateness:</b> The City will continue to facilitate the preservation of at-risk housing. This program is updated and included in the 2021-2029 Housing Element.</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
<b>GOAL 2.0: Assist in the provision of housing that meet the needs of all economic segments of the community.</b>		
<b>Program 5:</b> Section 8 Housing Choice Voucher Program	<ul style="list-style-type: none"> <li>Continue to provide Section 8 vouchers to approximately 467 extremely low and very low income households annually.</li> <li>Petition to HUD for additional funding to assist an increased number of households.</li> <li>Promote program to property owners/landlords to accept Section 8 vouchers.</li> </ul>	<p><b>Effectiveness:</b> The Redondo Beach Housing Authority (RBHA) provides rental subsidies to 437 Section 8 Voucher Program participants each month. The current goal as outlined in the RBHA's 5 year and 1-year agency plans is to provide assistance to 633 families. As of 2020, there are nearly 4,506 households on the waiting list.</p> <p><b>Continued Appropriateness:</b> This program remains an important resource for extremely low and very low income households and is included in the 2021-2029 Housing Element Update.</p>
<b>Program 6:</b> Services for the Homeless	<ul style="list-style-type: none"> <li>Continue to provide CDBG funding to agencies that operate emergency shelters, transitional housing, and supportive services for the homeless and persons with special needs.</li> </ul>	<p><b>Effectiveness:</b> The City continues to utilize CDBG funds to support homeless shelters and provide homeless services. Specifically, the City has provided CDBG funds for the following organizations: Shared Bread and St. Paul's United Methodist Church. Additionally, beginning in 2016, the City initiated a contract with People Assisting The Homeless (PATH) to provide coordinated entry services to those individuals experiencing homelessness and or facing the possibility of homelessness.</p> <p>Redondo Beach is working with HUD-VASH (Housing and Urban Development and Veterans Affairs Supportive Housing) to find permanent housing for homeless veterans. Redondo Beach Housing Authority has a total of 23 veterans housed in Redondo Beach under the HUD-VASH program. The goal of the RBHA is to utilize all 40 VASH vouchers allocated to the City. The City also recently approved, 11/10/20, "Pallet Shelter</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
		<p>Transitional Housing" at a location near the Galleria to support the local homeless population. Funding was provided from a combination of Federal, County, and local resources.</p> <p><b>Continued Appropriateness:</b> This program is included in the 2021-2029 Housing Element Update.</p>
<p><b>Program 7:</b> Affordable Housing Development</p>	<ul style="list-style-type: none"> <li>Continue to promote the availability of incentives for affordable housing development on the City website.</li> <li>At least every other year, conduct an affordable housing meeting with affordable housing developers and invite proposals from interested developers.</li> <li>Pursue additional State (e.g. State funds for transit-oriented development and infrastructure improvements) and federal funding for affordable development in conjunction with mixed use development on Galleria and Green Line station sites.</li> </ul>	<p><b>Effectiveness:</b> The City continues to monitor affordable housing development funding through the State Cap and Trade program.</p> <p>The Galleria, a Commercial-Retail/Hotel/Office and Residential Mixed Use Project included the development of 300 residential apartments, with 10% (30 units) very low income deed restricted or 20% (60 units) low income deed restricted has been approved on a property zoned CR (Commercial Regional - allows mixed used residential). Up to 60 of the units are to be set aside as affordable housing. The specific income level of the affordable units will be "very low or low income".</p> <p><b>Continued Appropriateness:</b> The City will continue to offer incentives for affordable housing. This program is included in the 2021-2029 Housing Element Update.</p>
<p><b>Program 8:</b> Green Task Force</p>	<ul style="list-style-type: none"> <li>Continue to promote and implement the policies outlined in the Sustainable City Plan, particularly those policies applicable to residential and mixed-use developments.</li> </ul>	<p><b>Effectiveness:</b> As a result of its Green Task Force, and its Sustainable City Plan, the City continues to track towards the following housing and building recommendations:</p> <p><u>Sustainability:</u> Added the following core value to its Strategic Plan:</p>



Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
		<p>“Environmental Responsibility. The City incorporates environmentally sustainable practices, policies, and programs and educate the public to preserve our quality of life for future generations.”</p> <p>Support for RBUSD Environmental Programs: City staff conducts regular training programs w/Redondo Beach Unified School District (RBUSD) students on various environmental and sustainable programs regularly applied to development projects by the City.</p> <p><u>Fee Structure:</u> The City Council approved Tier 1 &amp; Tier 2 rebate programs.</p> <p><u>Public Education Program:</u> Green Building consumer education materials are available at the Building counter and on the City's website.</p> <p><u>Historical Specimen Tree Protection:</u> Existing code provides for applications to designate trees as historic landmarks. All trees with trunk sizes over 6" in diameter are eligible.</p> <p><u>High Profile City Projects:</u> LED streetlight fixtures installation completed along Artesia Blvd., the Esplanade, and in Riviera Village.</p> <p><u>Renewable Energy Project Financing:</u> The City Council adopted Resolution to participate in Los Angeles County AB-811 program.</p> <p><u>LEED Standards:</u> North Branch Library certified as LEED Gold Building.</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
		<p><u>Staff Training:</u> Staff attended California Building Officials (CALBO) Green workshops.</p> <p><u>Integrated Bicycle Master Plan:</u> On 5/21/13, the City Council approved a letter of agreement with LA Metro for the Bicycle Transportation Plan Implementation Project.</p> <p><b>Continued Appropriateness:</b> This program continues to be appropriate and is included in the 2021-2029 Housing Element Update.</p>
<b>GOAL 3.0: Provide suitable sites for housing development which can accommodate a range of housing by type, size, location, price, and tenure.</b>		
<b>Program 9:</b> Residential Sites Inventory	<ul style="list-style-type: none"> <li>Maintain an inventory of adequate sites and provide sites information to interested developers</li> <li>Update inventory annually to ensure adequate sites are available to accommodate the City's remaining RHNA.</li> </ul>	<p><b>Effectiveness:</b> The City has continued to maintain its sites inventory that is adequate to accommodate its RHNA. Additional sites and capacity for the provision of affordable housing have been identified in order to accommodate the City's recently 6th cycle RHNA.</p> <p><b>Continued Appropriateness:</b> This program is included in the 2021-2029 Housing Element Update.</p>
<b>Program 10:</b> Sites Inventory Monitoring for "No Net Loss"	<ul style="list-style-type: none"> <li>Develop evaluation procedure to implement Government Code section 65863 by July 1, 2014.</li> </ul>	<p><b>Effectiveness:</b> The City has improved its GIS capability, allowing better correlation with residential sites inventory and building permit data. Additionally for all residential projects proposed for sites included on the City's existing sites inventory list, if the development does not include affordable housing and/or maximum allowable residential density and analysis is included that ensures RHNA capacity can still be accommodated on the remaining sites inventory.</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
		<p><b>Continued Appropriateness:</b> The City will continue to monitor its residential capacity. This program is included in the 2021-2029 Housing Element Update.</p>
<p><b>Program 11:</b> Small Lot Development/Lot Consolidation</p>	<ul style="list-style-type: none"> <li>• Develop in 2018/2019 appropriate incentives, development standards (such as reduced minimum lot size), and review procedures to facilitate small lot development particularly for MU zone properties.</li> <li>• Develop in 2018/2019 appropriate incentives, development standards, and review procedures to facilitate lot consolidation for affordable housing development.</li> </ul>	<p><b>Effectiveness:</b> Developers in the City has been able to assemble properties for development and reach an average density that is approaching the maximum density.</p> <p><b>Continued Appropriateness:</b> The City will continue to monitor its residential standards. This program is included in the 2021-2029 Housing Element Update.</p>
<p><b>Program 12:</b> Mixed-Use Housing Development</p>	<ul style="list-style-type: none"> <li>• Continue marketing mixed use development and annually conduct marketing events.</li> </ul>	<p><b>Effectiveness:</b> In 2011, the City amended the land use regulations and development standards related to building height, permitted uses and parking requirements within the Mixed Use (MU) and Regional Commercial (RC) zones. These amendments were intended to ensure that residential uses in the City's mixed use zones were not adversely impacted by adjacent commercial uses.</p> <p>Since 2014, the following mixed use developments have been developed or proposed in the City:</p> <p><u>Legado Mixed Use Project</u> A 115-unit mixed use project has been approved at 1700 S. Pacific Coast Highway. This project is adjacent to Site #1 (Pacific Coast Highway Mixed Use) in the Residential Sites Inventory (discussed below).</p> <p><u>219 Avenue I Mixed Use Project</u> A mixed use project consisting of 12 apartment units and 6,000 square feet of commercial development has</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
		<p>been approved on a property zoned MU-3C within the Coastal Zone. Two of the units will be set aside as affordable housing. The specific income level of the affordable units has not been determined. For purpose of this update, moderate income level is assumed.</p> <p><u>Seabreeze Mixed Use Project</u> Similar to the Legado Project discussed above, is a 52-unit residential condominium project with approximately 10,000 square feet of commercial space, currently under construction and also demonstrates the feasibility of intensification along S. Pacific Coast Highway.</p> <p><u>The Galleria Project:</u> This is a Commercial-Retail/Hotel/Office and Residential Mixed Use Project that includes the development of 300 residential apartments, with 10% (30 units) very low income deed restricted or 20% (60 units) low income deed restricted and was approved in 2019 on a property zoned CR (Commercial Regional - allows mixed used residential). Up to 60 of the units are to be set aside as affordable housing. The specific income level of the affordable units will be either "very low or low income".</p> <p><b>Continued Appropriateness:</b> The Recommended Land Use Plan for the General Plan update emphasizes the Residential Overlay for increased residential development capacity.</p>
<b>Program 13:</b> Transit-Oriented Development	<ul style="list-style-type: none"> <li>The City of Redondo Beach will be reviewing and refining the Model TOD Ordinance as part of their General Plan Land Use Element update.</li> </ul>	<p><b>Effectiveness:</b> The City has reviewed zoning designations in proximity to the existing Green Line station at Marine Avenue and the future Green Line station planned near the Galleria development and is</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
		<p>proposing to increase residential densities in these areas.</p> <p><b>Continued Appropriateness:</b> The concept of TOD is incorporated into the City's Recommended Land Use Plan for the General Plan update.</p>
<b>GOAL 4.0: Mitigate any potential governmental constraints to housing production and affordability.</b>		
<p><b>Program 14:</b> Amendments to the Zoning Ordinance</p>	<ul style="list-style-type: none"> <li>Annually review the Zoning Ordinance to identify potential constraints and amend the Zoning Ordinance as necessary.</li> </ul>	<p>The City's <u>Accessory Dwelling Units</u> ordinance with updated in 2019 and again in 2020 to be consistent with recent changes in State Housing Law. Additionally the City adopted an <u>Emergency Shelters Ordinance</u> in 2017.</p> <p><u>Planned Zoning Ordinance Amendments</u> to address/update specific provisions for Transitional Housing and Supportive Housing are forthcoming in conjunction with the Zoning Ordinance update to implement the updated General Plan.</p> <p><b>Continued Appropriateness:</b> Additional amendments to the City's Zoning Ordinance are included in the 2021-2029 Housing Element Update.</p>
<p><b>Program 15:</b> Monitoring the Effect of Article 27 of the City Charter (Measure DD)</p>	<ul style="list-style-type: none"> <li>Annually review the level of development activities in high density residential and mixed use areas and ensure that there is an adequate supply of sites to accommodate the RHNA.</li> <li>Monitor development trends and applications for rezoning where Measure DD is triggered to assess if such trends warrant a review of Measure DD.</li> </ul>	<p><b>Effectiveness:</b> There have not been any applications for rezoning where Measure DD has been triggered except for the provision/allowing a 98-Unit Assisted Living Facility on a property zoned P-CF. The subject property in this case was granted the zone change and the ballot measure passed. This facility has now been constructed and is fully operational.</p> <p><b>Continued Appropriateness:</b> This program is included in the 2021-2029 Housing Element Update.</p>

Review of Past Accomplishments		
Program	Objectives	Effectiveness and Continued Appropriateness
<b>GOAL 5.0: Continue to promote equal housing opportunity in the City’s housing market regardless of age, race, color, sex, marital status, familial status, national origin, ancestry, religion, sexual orientation, source of income or any other arbitrary factors.</b>		
<b>Program 16:</b> Fair Housing Program	<ul style="list-style-type: none"> <li>Continue to contract with a fair housing service provider to provide fair housing and tenant/landlord services.</li> <li>Promote fair housing awareness in City newsletter and website.</li> </ul>	<p><b>Effectiveness:</b> As a CDBG entitlement jurisdiction, the City continues to utilize CDBG funds to support the Housing Rights Center which provides fair housing services for residents and landlords.</p> <p>Additionally, the City adopted a Resolution in late 2019 to effectively stay any evictions prior to the States enactment of Rent Control.</p> <p><b>Continued Appropriateness:</b> This program is included in the 2021-2029 Housing Element Update.</p>

Summary of Quantified Objectives and Accomplishments (2013-2021)						
	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
<b>Objectives</b>						
New Construction	186	186	223	238	564	1,397
Rehabilitation	0	4	16	40	0	60
Section 8	233	234	0	0	0	467
Preservation of At-Risk Units	0	68	41	0	0	109
<b>Accomplishments</b>						
New Construction (Remaining RHNA)	0	2	40	2	515	559
Rehabilitation	30	30	10	0	0	70
Section 8	233	234	0	0	0	467
Preservation of At-Risk Units	0	68	41	0	0	109
Income distribution of rehabilitation accomplishments is estimate only as seniors and disabled are presumed to be very low income without the need for income verification under the CDBG program.						

## Appendix B: Detailed Residential Sites Inventory

The detailed sites inventory for the 6<sup>th</sup> cycle RHNA is provided in this appendix. Table B-1 includes parcels that are not being re-designated with the exception of MU-3 becoming MU-2. Table B-2 are parcels that will be redesignated as a result of the new General Plan.

	Residential Recycling
	Church Properties
	MU-1
	MU-2
	Kingsdale - Residential Overlay
	North Tech - Residential Overlay
	190th Street - Residential Overlay
	South of Transit Center - Residential Overlay
	South Bay Marketplace - Residential Overlay
	FedEx Residential Overlay

Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built	
2608 HUNTINGTON LN	4082006008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.50	1990
2217 WARFIELD AVE	4150001028		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.86	1989
2231 WARFIELD AVE	4150001036		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.55	1989
2012 WARFIELD AVE	4150006006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.34	1990
2111 DUFOUR AVE	4150007019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.67	1989
2123 DUFOUR AVE	4150007025		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.57	1989
2228 WARFIELD AVE	4150008002		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1988
2226 WARFIELD AVE	4150008003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1988
2224 WARFIELD AVE	4150008004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1988
2220 WARFIELD AVE	4150008006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.73	1988
2217 DUFOUR AVE	4150008027		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.49	1987
2219 DUFOUR AVE	4150008028		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.37	1988
2225 DUFOUR AVE	4150008031		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.62	1990
3401 VAIL AVE	4150008035		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.44	1990
2227 DUFOUR AVE A	4150008076		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.01	1989
2227 DUFOUR AVE B	4150008077		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.14	1989
2206 WARFIELD AVE A	4150008078		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.33	1989
2206 WARFIELD AVE B	4150008079		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.31	1989
2104 DUFOUR AVE	4150010010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.45	1989
2003 BATAAN RD	4150011016		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.38	1988
1909 FARRELL AVE	4150013015		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.62	1981
1919 FARRELL AVE	4150013020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.17	1984
2008 BATAAN RD	4150014007		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.34	1981
2015 FARRELL AVE	4150014018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.98	1979
2110 BATAAN RD	4150015007		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1981
2119 FARRELL AVE	4150015073		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.39	1986
2228 BATAAN RD	4150016002		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.00	1986
2220 BATAAN RD	4150016006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.32	1986
2216 BATAAN RD	4150016008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.79	1986
2223 FARRELL AVE	4150016028		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.85	1984
2227 FARRELL AVE	4150016030		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.51	1984
3201 VAIL AVE	4150016034		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	1990
2230 BATAAN RD	4150016035		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1990
2214 BATAAN RD	4150016073		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.00	1980
3107 RINDGE LN	4150018004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.14	1980
2102 FARRELL AVE	4150018011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.07	1978
2101 ERNEST AVE	4150018013		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	7.59	1978
2103 ERNEST AVE	4150018014		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.47	1978
2107 ERNEST AVE	4150018016		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.00	1978
2109 ERNEST AVE	4150018018		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.40	1978
2111 ERNEST AVE	4150018019		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.63	1978
2115 ERNEST AVE	4150018023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.51	1978
2016 FARRELL AVE	4150019003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.42	1977
2012 FARRELL AVE	4150019005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.33	1977
2010 FARRELL AVE	4150019006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.32	1977
2003 ERNEST AVE	4150019013		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.21	1977
2005 ERNEST AVE	4150019014		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	1980
2011 ERNEST AVE	4150019017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.13	1980
2013 ERNEST AVE	4150019018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.17	1980
2017 ERNEST AVE	4150019020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.26	1980
2021 ERNEST AVE	4150019022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.50	1980
2023 ERNEST AVE	4150019023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.53	1980
1911 PERRY AVE	4150021016		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.01	1979
3006 AVIATION BLVD	4150021021		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.36	1980
2014 ERNEST AVE	4150022006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1976
2010 ERNEST AVE	4150022008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.56	1976
2005 PERRY AVE	4150022029		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1986
2112 ERNEST AVE	4150023005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1978
2115 PLANT AVE	4150026020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1969
2121 PLANT AVE	4150026023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	1969
2004 PERRY AVE	4150027010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.79	1979
2002 PERRY AVE	4150027011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.10	1979
2013 PLANT AVE	4150027019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.71	1979



Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built	
2012 PERRY AVE	4150027030		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.41	1987
1907 ROBINSON ST	4150029013		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.44	1978
1909 ROBINSON ST	4150029014		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1978
2010 PLANT AVE	4150030007		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1987
2011 ROBINSON ST	4150030017		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	1987
2013 ROBINSON ST	4150030018		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	1987
2106 PLANT AVE	4150031009		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1984
2104 PLANT AVE	4150031010		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1984
2102 PLANT AVE	4150031011		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.38	1985
2107 ROBINSON ST	4150031016		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1985
2109 ROBINSON ST	4150031017		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.46	1985
2119 ROBINSON ST	4150031022		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.92	1976
2220 PLANT AVE	4150032006		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.38	1980
2206 PLANT AVE	4150032013		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.68	1978
2219 ROBINSON ST	4150032025		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.14	1978
2225 ROBINSON ST	4150032028		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.62	1978
2215 ROBINSON ST	4150032085		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.21	1982
2304 CURTIS AVE	4153002005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.32	1984
2301 VOORHEES AVE	4153002008		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.00	1984
2307 VOORHEES AVE	4153002011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.33	1984
2301 CURTIS AVE	4153002023		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	1986
2305 CURTIS AVE	4153002025		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.67	1986
2314 CURTIS AVE	4153002031		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1986
2407 MACKAY LN	4153002032		RL	R-2	14.5	0.20	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.69	1986
2309 VOORHEES AVE A	4153002083		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.00	1984
2309 VOORHEES AVE B	4153002084		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.00	1984
2311 VOORHEES AVE A	4153002085		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.00	1984
2311 VOORHEES AVE B	4153002086		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.73	1984
2305 NELSON AVE	4153003011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.22	1984
2311 NELSON AVE	4153003014		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.32	1984
2314 VOORHEES AVE	4153003017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.33	1984
2308 VOORHEES AVE	4153003020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.83	1984
2402 NELSON AVE	4153006011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.18	1985
2400 NELSON AVE	4153006012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.68	1985
2418 VOORHEES AVE	4153008004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	1977
2412 VOORHEES AVE	4153008007		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.32	1977
2406 VOORHEES AVE	4153008010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1977
2404 VOORHEES AVE	4153008011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.91	1981
2411 RUHLAND AVE	4153008018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.40	1981
2415 RUHLAND AVE	4153008020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.27	1981
2413 VOORHEES AVE	4153009019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.95	1990
2415 VOORHEES AVE	4153009020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.01	1977
2416 GATES AVE	4153010004		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.71	1985
2402 GATES AVE	4153010013		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.02	1980
2405 CURTIS AVE	4153010026		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.17	1980
2423 CURTIS AVE	4153010031		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				0	0	1	0.52	1979
2414 GRAHAM AVE	4153011005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.13	1981
2502 GRAHAM AVE	4153014006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1976
2500 GRAHAM AVE	4153014007		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.17	1976
2502 CURTIS AVE	4153016008		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.78	1976
2500 CURTIS AVE	4153016009		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.51	1976
2500 VOORHEES AVE	4153017009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.67	1978
1920 GRAHAM AVE	4155005008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.48	1981
1910 GRAHAM AVE	4155005012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.27	1986
1907 GATES AVE	4155005020		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.86	1986
1913 GATES AVE	4155005023		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.60	1987
2010 GRAHAM AVE	4155006008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.78	1979
2004 GRAHAM AVE	4155006011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.30	1979
2019 GATES AVE	4155006023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.12	1979
2611 RINDGE LN	4155007001		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.65	1979
2118 GRAHAM AVE	4155007003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.03	1979
2114 GRAHAM AVE	4155007005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.98	1986
2102 GRAHAM AVE	4155007011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.45	1986

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2100 GRAHAM AVE	4155007012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.33	1979
2106 GRAHAM AVE A	4155007068		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.40	1984
2106 GRAHAM AVE B	4155007069		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.33	1979
2230 GRAHAM AVE	4155008001		RL	R-2	14.5	0.20	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.31	1979
2224 GRAHAM AVE	4155008004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.80	1980
2222 GRAHAM AVE	4155008005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	1980
2221 GATES AVE	4155008026		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.68	1980
2223 GATES AVE	4155008027		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1980
2204 GRAHAM AVE	4155008033		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.82	1980
2207 GATES AVE B	4155008097		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.97	1975
2216 GATES AVE	4155009006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.00	1975
2212 GATES AVE	4155009008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.65	1975
2206 GATES AVE	4155009011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.15	1978
2228 GATES AVE	4155009033		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.32	1984
2120 GATES AVE	4155010002		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.26	1984
2118 GATES AVE	4155010003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1984
2110 GATES AVE	4155010007		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1984
2121 CURTIS AVE	4155010022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	1983
2108 GATES AVE A	4155010058		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.18	1974
2108 GATES AVE B	4155010059		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.18	1974
1923 CURTIS AVE	4155012032		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.06	1975
1925 CURTIS AVE	4155012033		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.35	1975
1927 CURTIS AVE	4155012034		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.01	1975
1929 CURTIS AVE	4155012035		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1975
1916 CURTIS AVE	4155013011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.29	1981
1910 CURTIS AVE	4155013014		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.18	1981
1919 VOORHEES AVE	4155013030		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1981
2405 VAIL AVE	4155016034		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.51	1989
2220 VOORHEES AVE	4155017006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1987
2229 RUHLAND AVE	4155017032		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.23	1987
2305 VAIL AVE	4155017033		RL	R-2	14.5	0.20	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.94	1987
2104 VOORHEES AVE A	4155018045		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.34	1989
2104 VOORHEES AVE B	4155018046		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.34	1987
1917 RUHLAND AVE	4155020026		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.22	1989
1930 RUHLAND AVE	4155021003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.30	1990
1913 NELSON AVE	4155021027		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1989
1929 NELSON AVE	4155021035		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.01	1989
2222 RUHLAND AVE	4155024005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.00	1988
2216 RUHLAND AVE	4155024008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1985
2114 NELSON AVE	4155026025		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				0	0	1	0.12	1990
1911 HUNTINGTON LN	4156019018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.62	1989
1810 HUNTINGTON LN	4156021008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.27	1988
1912 HUNTINGTON LN A	4156022058		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.33	1920
1912 HUNTINGTON LN B	4156022059		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.84	1920
2013 HARRIMAN LN	4156023018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.53	1924
2019 HARRIMAN LN	4156023021		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.56	1924
2115 HARRIMAN LN	4156024020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.06	1958
2118 HARRIMAN LN	4156025003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1968
2116 HARRIMAN LN	4156025004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.83	1965
2106 HARRIMAN LN	4156025009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	1952
2100 HARRIMAN LN	4156025012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.37	1959
2111 CLARK LN	4156025018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.07	1960
2104 HARRIMAN LN B	4156025070		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.24	1990
2019 CLARK LN	4156026022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.37	1978
	4156026084		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.32	1963
	4156026085		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.33	1963
1906 HARRIMAN LN	4156027009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1963
1902 HARRIMAN LN	4156027011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.01	1963
1900 HARRIMAN LN	4156027012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.33	1963
1901 CLARK LN	4156027013		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.67	1980
1913 CLARK LN	4156027019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1963
1919 CLARK LN	4156027022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.46	1963
1910 CLARK LN	4156028007		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.30	1963



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2016 CLARK LN	4156029004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.61	1963
2006 CLARK LN	4156029009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.13	1963
2115 MARSHALLFIELD LN	4156030020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.21	1963
2117 MARSHALLFIELD LN	4156030021		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.31	1963
2121 MARSHALLFIELD LN	4156030026		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.91	1963
2119 MARSHALLFIELD LN A	4156030070		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.31	1978
2119 MARSHALLFIELD LN B	4156030071		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.59	1980
2511 HUNTINGTON LN	4157017017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1978
2403 HUNTINGTON LN	4157018010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.66	1965
2307 HUNTINGTON LN	4157019016		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.44	1965
2309 HUNTINGTON LN	4157019017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.00	1965
2319 HUNTINGTON LN	4157019022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.81	1965
2315 HUNTINGTON LN A	4157019045		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.00	1965
2315 HUNTINGTON LN B	4157019046		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.00	1965
2217 HUNTINGTON LN	4157020022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.49	1968
2212 HUNTINGTON LN	4157021005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.40	1961
2205 HARRIMAN LN	4157021013		RL	R-2	14.5	0.18	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.38	1971
2213 HARRIMAN LN	4157021017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.34	1974
2217 HARRIMAN LN	4157021019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.24	0
2223 HARRIMAN LN	4157021022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.57	0
2207 HARRIMAN LN A	4157021068		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.45	1968
2207 HARRIMAN LN B	4157021069		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.50	1982
2314 HUNTINGTON LN	4157022005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.08	1924
2306 HUNTINGTON LN	4157022008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.36	1954
2301 HARRIMAN LN	4157022012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.40	1925
2313 HARRIMAN LN	4157022018		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1920
2414 HUNTINGTON LN	4157023005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1959
2410 HUNTINGTON LN A	4157023067		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.43	1952
2410 HUNTINGTON LN B	4157023068		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.23	1952
2420 HUNTINGTON LN	4157023070		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.00	1959
2501 HARRIMAN LN	4157024013		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.27	1958
2511 HARRIMAN LN	4157024018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.53	1960
2518 HARRIMAN LN	4157025003		RL	R-2	14.5	0.18	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.23	1962
2512 HARRIMAN LN	4157025006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.50	1964
2516 HARRIMAN LN B	4157025049		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.00	1954
2412 HARRIMAN LN	4157026006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.69	1958
2404 HARRIMAN LN	4157026010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1954
2402 HARRIMAN LN	4157026011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	1955
2403 CLARK LN	4157026014		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.65	1963
2310 HARRIMAN LN	4157027007		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.76	1959
2304 HARRIMAN LN	4157027010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.29	1954
2321 CLARK LN	4157027023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.53	1958
2315 CLARK LN A	4157027060		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.34	1957
2315 CLARK LN B	4157027061		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.86	1956
2309 CLARK LN A	4157027063		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.47	1955
2309 CLARK LN B	4157027064		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.51	1954
2208 HARRIMAN LN	4157028008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.49	1952
2213 CLARK LN	4157028019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.73	1949
2223 MARSHALLFIELD LN	4157029021		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.09	1952
2316 CLARK LN	4157030004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.34	1990
2306 CLARK LN	4157030009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.63	1964
2302 CLARK LN	4157030011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.49	0
2303 MARSHALLFIELD LN	4157030014		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.44	1980
2315 MARSHALLFIELD LN UNIT	4157030020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.82	0
2408 CLARK LN	4157031008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
2409 MARSHALLFIELD LN	4157031017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.35	0
2419 MARSHALLFIELD LN	4157031022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.50	0
2511 RIPLEY AVE	4157032018		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.40	0
2309 PULLMAN LN	4158001017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	5.57	0
2311 PULLMAN LN	4158001018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.40	0
2402 MARSHALLFIELD LN	4158003010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.35	0
2204 MARSHALLFIELD LN	4159001010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.39	0
2203 PULLMAN LN	4159001014		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	0

Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built	
2211 PULLMAN LN	4159001018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
2102 MARSHALLFIELD LN	4159002011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.51	0
2100 MARSHALLFIELD LN	4159002012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.57	0
2013 PULLMAN LN	4159003018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1911 PULLMAN LN	4159004017		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.52	0
1912 MARSHALLFIELD LN	4159004076		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1911 BELMONT LN	4159005018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.80	0
1905 BELMONT LN A	4159005080		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	4.17	0
1905 BELMONT LN B	4159005081		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.19	0
2016 PULLMAN LN	4159006004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	0
2122 PULLMAN LN	4159007001		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.50	0
2120 PULLMAN LN	4159007002		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.46	0
2108 PULLMAN LN	4159007008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.36	0
1007 SLAUSON LN	4159008002		RL	R-2	14.5	0.20	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.22	0
1011 SLAUSON LN	4159008056		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.32	0
2220 PULLMAN LN	4159008057		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.36	0
2203 SPEYER LN	4159009016		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.12	0
2213 SPEYER LN A	4159009040		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.30	0
2213 SPEYER LN B	4159009041		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.28	0
2022 BELMONT LN	4159011001		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.59	0
2006 BELMONT LN	4159011009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.42	0
2004 BELMONT LN	4159011010		RL	R-2	14.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	3.08	0
2001 SPEYER LN	4159011013		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.71	0
2007 SPEYER LN	4159011016		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.89	0
2003 SPEYER LN A	4159011072		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.86	0
2003 SPEYER LN B	4159011073		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.86	0
1922 BELMONT LN	4159012001		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.80	0
1916 BELMONT LN	4159012004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1914 BELMONT LN	4159012005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.32	0
1906 BELMONT LN	4159012009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.20	0
1909 SPEYER LN	4159012018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.20	0
1906 SPEYER LN	4159013009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1902 SPEYER LN	4159013011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.31	0
808 FLAGLER LN	4159013012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.81	0
2022 SPEYER LN	4159014001		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	0
2003 MORGAN LN	4159014014		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.79	0
2005 MORGAN LN	4159014015		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.59	0
2013 MORGAN LN	4159014019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
2018 SPEYER LN A	4159014070		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.33	0
2018 SPEYER LN B	4159014071		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.89	0
2018 MORGAN LN	4159016011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.42	0
2004 MORGAN LN	4159016018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.33	0
2005 HAVEMEYER LN	4159016024		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.42	0
2007 HAVEMEYER LN	4159016025		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.54	0
2021 RIPLEY AVE	4159016032		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.67	0
1920 MORGAN LN	4159017002		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.31	0
1913 HAVEMEYER LN	4159017019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.73	0
1918 HAVEMEYER LN	4159018003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.33	0
1914 HAVEMEYER LN	4159018005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.56	0
1915 SPRECKELS LN	4159018020		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.74	0
1919 SPRECKELS LN	4159018022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.29	0
1921 SPRECKELS LN	4159018034		RL	R-2	14.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.38	0
1802 SPEYER LN	4160001011		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.67	0
1807 MORGAN LN	4160001019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.49	0
1819 MORGAN LN A	4160001071		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.94	0
1819 MORGAN LN B	4160001072		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.06	0
1820 MORGAN LN	4160002002		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.62	0
1822 HAVEMEYER LN	4160002006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1816 SPRECKELS LN	4160003004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.28	0
1821 ARMOUR LN	4160003023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.16	0
1816 HARRIMAN LN	4161001004		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1812 HARRIMAN LN	4161001006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.71	0
1808 HARRIMAN LN	4161001008		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.82	0



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1806 HARRIMAN LN	4161001009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	0
1811 CLARK LN	4161001017		RL	R-2	14.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.15	0
1823 CLARK LN	4161001023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.39	0
1806 CLARK LN	4161002009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.37	0
1805 MARSHALLFIELD LN	4161002015		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.19	0
1809 MARSHALLFIELD LN	4161002018		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1820 MARSHALLFIELD LN	4161003003		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.65	0
1806 MARSHALLFIELD LN	4161003010		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.33	0
1809 PULLMAN LN	4161003019		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	0
1818 PULLMAN LN	4161004005		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.50	0
1816 PULLMAN LN	4161004006		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.64	0
1803 BELMONT LN	4161004015		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.50	0
1802 PULLMAN LN A	4161004062		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.75	0
1802 PULLMAN LN B	4161004063		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.33	0
1811 SPEYER LN	4161005022		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.43	0
1816 BELMONT LN	4161005074		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1700 CLARK LN	4161010011		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1716 CLARK LN	4161010028		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1212 FORD AVE	4161011017		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
1711 CLARK LN	4161011023		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.41	0
1721 CLARK LN	4161011028		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.54	0
1723 CLARK LN	4161011029		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
603 ELVIRA AVE	7508014014		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.30	0
605 ELVIRA AVE	7508014015		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.71	0
607 ELVIRA AVE	7508014016		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.48	0
611 ELVIRA AVE	7508014018		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.58	0
613 ELVIRA AVE	7508014019		RL	R-2	14.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
707 ELVIRA AVE	7508015021		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.66	0
715 ELVIRA AVE	7508015025		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
717 ELVIRA AVE	7508015026		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
719 ELVIRA AVE	7508015027		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
316 TOPAZ ST	7508015035		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.27	0
710 ELVIRA AVE	7508016009		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.25	0
704 ELVIRA AVE	7508016012		RL	R-2	14.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	1.25	0
620 ELVIRA AVE	7508017023		RL	R-2	14.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.26	0
626 ELVIRA AVE	7508017025		RL	R-2	14.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.52	0
628 ELVIRA AVE	7508017026		RL	R-2	14.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	2.58	0
2004 ERNEST AVE	4150022011		RL	R-2	14.5	0.21	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.82	1976
2315 VOORHEES AVE	4153002015		RL	R-2	14.5	0.22	Residential	Used in Prior Housing Element - Non-Vacant				2	2	1	0.38	1984
2407 CURTIS AVE	4153010027		RL	R-2	14.5	0.21	Residential	Used in Prior Housing Element - Non-Vacant				1	1	1	0.11	1980
2501 CURTIS AVE	4153015010		RL	R-2	14.5	0.23	Residential	Used in Prior Housing Element - Non-Vacant				2	2	1	0.16	1976
616 ELVIRA AVE	7508017021		RL	R-2	14.5	0.25	Residential	Used in Prior Housing Element - Non-Vacant				2	2	1	0.58	0
1904 PERKINS LN	4082001041		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0
2703 VANDERBILT LN	4082001042		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.14	0
2723 GRANT AVE	4082008013		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0
2721 CARNEGIE LN	4082011042		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.87	0
2807 190TH ST	4083016001		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0
2805 190TH ST	4083016002		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.40	0
2783 190TH ST	4083018008		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.41	0
2781 190TH ST	4083018009		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.96	0
2779 190TH ST	4083018010		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.84	0
2777 190TH ST	4083018011		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0
2775 190TH ST	4083018012		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.16	0
2773 190TH ST	4083018013		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0
2771 190TH ST	4083018014		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0
3507 VAIL AVE	4150001038		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0
2220 MANHATTAN BEACH BLV	4150001043		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.37	0
2224 MANHATTAN BEACH BLV	4150001047		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	2.08	0
2218 MANHATTAN BEACH BLV	4150001048		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.43	0
2226 MANHATTAN BEACH BLV	4150001049		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.88	0
2105 MACKAY LN	4153004024		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.27	0
2008 MACKAY LN	4153005011		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.11	0
2519 GATES AVE	4153014016		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1	0.25	0

Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built
2521 CURTIS AVE	4153015016		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2505 FELTON LN	4153015017		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.34	0
2523 CURTIS AVE	4153015018		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.27	0
2511 CURTIS AVE	4153015020		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2520 CURTIS AVE	4153016002		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2517 VOORHEES AVE	4153016063		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.00	0
2622 MATHEWS AVE	4153021001		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2107 PERKINS LN	4153022002		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2620 NELSON AVE	4153022003		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.21	0
2621 MATHEWS AVE	4153022021		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2103 PERKINS LN	4153022023		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.51	0
2618 RUHLAND AVE	4153023003		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2616 RUHLAND AVE	4153023004		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2614 RUHLAND AVE	4153023005		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2619 NELSON AVE	4153023021		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2621 NELSON AVE	4153023022		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2623 NELSON AVE	4153023083		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	4.00	0
2203 PERKINS LN	4153023084		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	4.25	0
2621 VOORHEES AVE	4153025022		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.52	0
2623 VOORHEES AVE	4153025023		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.12	0
2405 PERKINS LN	4153025024		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2620 GRAHAM AVE	4153027024		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2701 GATES AVE	4153029006		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.67	0
2703 GATES AVE	4153029007		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.32	0
2507 INGLEWOOD AVE	4153030026		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.40	0
2306 PERKINS LN	4153031005		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.12	0
2702 MATHEWS AVE	4153032016		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.17	0
2006 PERKINS LN	4153032018		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2706 MATHEWS AVE	4153032027		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.73	0
2706 NELSON AVE	4153032056		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1904 GRAHAM AVE	4155005015		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2600 AVIATION BLVD	4155005019		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	0
1904 GATES AVE	4155012018		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.46	0
1901 CURTIS AVE	4155012021		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.36	0
1903 CURTIS AVE	4155012022		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1905 CURTIS AVE	4155012023		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.54	0
1900 GATES AVE	4155012039		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2410 AVIATION BLVD	4155013017		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1904 CURTIS AVE	4155013018		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2408 AVIATION BLVD	4155013019		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.09	0
2210 AVIATION WAY	4155021016		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.59	0
1904 RUHLAND AVE	4155021017		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.40	0
2208 AVIATION WAY	4155021018		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.56	0
2105 GREEN LN	4155028037		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2002 MATHEWS AVE	4155030011		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.28	0
2121 ROCKEFELLER LN	4156009023		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.68	0
2123 ROCKEFELLER LN	4156009025		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.46	0
2100 CARNEGIE LN	4156009030		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2101 ROCKEFELLER LN	4156009032		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1705 GREEN LN	4156011026		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.65	0
1706 FLAGLER LN	4156011034		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.37	0
1810 CARNEGIE LN	4156012011		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.00	0
1808 CARNEGIE LN	4156012013		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.86	0
1805 GRANT AVE	4156013019		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.05	0
1607 FLAGLER LN	4156013051		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.77	0
1604 FLAGLER LN	4156014014		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.61	0
2102 ROCKEFELLER LN	4156016025		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1606 BLOSSOM LN	4156016026		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.83	0
2100 ROCKEFELLER LN	4156016027		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1804 RINDGE LN	4157005013		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1802 RINDGE LN	4157005014		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1805 SLAUSON LN	4157005026		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.59	0
2315 CARNEGIE LN	4157006020		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.59	0



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1806 PHELAN LN	4157008011		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.36	0
1804 PHELAN LN	4157008013		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1704 MACKAY LN	4157010014		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.66	0
2202 CARNEGIE LN	4157012011		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	0
2200 CARNEGIE LN	4157012012		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1706 RINDGE LN	4157012013		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.23	0
2420 ROCKEFELLER LN	4157015002		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.29	0
1607 PHELAN LN	4157015003		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2218 GRANT AVE	4157020003		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.02	0
1205 LILIENTHAL LN	4158004008		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1203 LILIENTHAL LN	4158004009		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.38	0
1201 LILIENTHAL LN	4158004010		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.72	0
2412 RIPLEY AVE	4158004020		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.51	0
2421 IVES LN	4158004031		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1105 LILIENTHAL LN	4158004032		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.39	0
1101 LILIENTHAL LN	4158004033		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.46	0
907 LILIENTHAL LN	4158007002		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.75	0
2420 ALVORD LN A	4158013050		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.32	0
2420 ALVORD LN B	4158013051		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.23	0
2519 190TH ST	4158016011		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2517 190TH ST	4158016012		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.42	0
2515 190TH ST	4158016013		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.08	0
2511 190TH ST	4158016015		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.34	0
2507 190TH ST	4158016017		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.23	0
2505 190TH ST	4158016018		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.51	0
2503 190TH ST	4158016019		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2501 190TH ST	4158016020		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2607 190TH ST	4158017012		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.33	0
2605 190TH ST	4158017013		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2521 190TH ST	4158017016		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1725 GRANT AVE	4162003031		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
423 ANITA ST	4186030001		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.50	0
403 ANITA ST	4186031025		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.51	1952
405 ANITA ST	4186031026		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.27	1961
411 ANITA ST	4186031029		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.49	1978
413 ANITA ST	4186031030		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.23	1978
415 ANITA ST	4186031031		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	1955
827 N LUCIA AVE	7502001001		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.08	0
833 N LUCIA AVE	7502001005		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.02	0
841 N LUCIA AVE	7502001007		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.69	0
826 N JUANITA AVE	7502001018		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.73	0
805 N LUCIA AVE	7502002003		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
821 N LUCIA AVE	7502002009		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.50	0
814 N JUANITA AVE	7502002012		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.67	0
810 N JUANITA AVE	7502002014		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.02	0
808 N JUANITA AVE	7502002015		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.26	0
707 N LUCIA AVE	7502003005		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.15	0
715 N LUCIA AVE	7502003009		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.46	0
717 N LUCIA AVE	7502003010		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.50	0
712 N JUANITA AVE	7502003026		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.55	0
704 N JUANITA AVE	7502003030		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.94	0
724 N LUCIA AVE	7502005019		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.30	0
526 N LUCIA AVE	7502025002		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.52	0
522 N LUCIA AVE	7502025004		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.30	0
520 N LUCIA AVE	7502025005		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.28	0
516 N LUCIA AVE	7502025007		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.11	0
507 N MARIA AVE	7502025027		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.93	0
531 N MARIA AVE	7502025034		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.48	0
	7502025075		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.48	0
	7502025076		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.00	0
601 N LUCIA AVE	7502026001		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.44	0
607 N LUCIA AVE	7502026005		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.41	0
628 N JUANITA AVE	7502026016		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.94	0

Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built
614 N JUANITA AVE	7502026022		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.29	0
608 N JUANITA AVE	7502026025		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1019 DIAMOND ST	7502027003		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.58	0
521 N LUCIA AVE	7502027012		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.87	0
520 N JUANITA AVE	7502027021		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.23	0
510 N JUANITA AVE	7502027026		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.14	0
813 N JUANITA AVE	7503002007		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.22	0
815 N JUANITA AVE	7503002024		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.37	0
724 N IRENA AVE	7503004021		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
708 N IRENA AVE	7503004029		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.16	0
700 N IRENA AVE	7503004033		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
615 BERYL ST	7503005027		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.17	0
611 BERYL ST	7503005028		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.65	0
507 N GERTRUDA AVE	7503010002		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.90	0
511 N GERTRUDA AVE	7503010004		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	3.06	0
504 N FRANCISCA AVE	7503010022		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
527 N FRANCISCA AVE	7503011014		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.10	0
524 N ELENA AVE	7503011018		RM	R-3A	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
512 N ELENA AVE	7503011024		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.38	0
428 N GERTRUDA AVE	7503019015		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.53	0
426 N GERTRUDA AVE	7503019016		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
404 N GERTRUDA AVE	7503019028		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.53	0
721 CARNELIAN ST	7503020033		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.01	0
723 CARNELIAN ST	7503020034		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.45	0
729 CARNELIAN ST	7503020035		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.10	0
731 CARNELIAN ST	7503020036		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.22	0
611 N JUANITA AVE	7503022006		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.13	0
626 N IRENA AVE	7503022019		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.39	0
624 N IRENA AVE A	7503022085		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.93	0
624 N IRENA AVE B	7503022086		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.10	0
521 N JUANITA AVE	7503023009		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.21	0
516 N IRENA AVE	7503023020		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.56	0
519 N IRENA AVE	7503024010		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
523 N IRENA AVE	7503024012		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.07	0
524 N HELBERTA AVE	7503024014		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
514 N HELBERTA AVE	7503024018		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.23	0
529 N HELBERTA AVE	7503025015		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.14	0
517 N GUADALUPE AVE	7503026008		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.30	0
519 N GUADALUPE AVE	7503026009		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.20	0
521 N GUADALUPE AVE	7503026010		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.77	0
525 N GUADALUPE AVE	7503026011		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	3.67	0
527 N GUADALUPE AVE	7503026012		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
302 N GERTRUDA AVE	7503026029		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.27	0
307 N GERTRUDA AVE	7503027004		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.05	0
309 N GERTRUDA AVE	7503027005		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	7.95	0
311 N GERTRUDA AVE	7503027006		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
313 N GERTRUDA AVE	7503027007		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
327 N GERTRUDA AVE	7503027014		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.85	0
308 N FRANCISCA AVE	7503027026		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.56	0
410 EL REDONDO AVE	7504005003		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
715 VINCENT PARK	7504005005		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.01	0
104 EL REDONDO AVE	7504006007		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.30	0
619 VINCENT ST	7504006012		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.52	0
625 VINCENT PARK	7504006013		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.90	0
502 EL REDONDO AVE	7504009002		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.05	0
506 EL REDONDO AVE	7504009004		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.59	0
508 EL REDONDO AVE	7504009005		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.07	0
510 EL REDONDO AVE	7504009006		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.67	0
602 EL REDONDO AVE	7504009010		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
604 EL REDONDO AVE	7504009011		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
606 EL REDONDO AVE	7504009012		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
608 EL REDONDO AVE	7504009013		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.14	0
710 VINCENT PARK	7504009017		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.13	0



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Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built
610 EL REDONDO AVE	7504009022		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
616 EL REDONDO AVE	7504009024		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.97	0
624 EL REDONDO AVE	7504009027		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.30	0
706 EL REDONDO AVE	7504009031		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.96	0
712 EL REDONDO AVE	7504009032		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.59	0
800 EL REDONDO AVE	7504009034		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.56	0
802 EL REDONDO AVE	7504009035		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.00	0
814 EL REDONDO AVE	7504009041		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.70	0
816 EL REDONDO AVE	7504009042		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
622 VINCENT PARK	7504009046		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.01	0
626 VINCENT PARK	7504009048		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.97	0
636 VINCENT PARK	7504009081		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.01	0
104 N GUADALUPE AVE	7504011007		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
101 N HELBERTA AVE	7504011011		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.60	0
109 N HELBERTA AVE	7504011017		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.45	0
615 EL REDONDO AVE	7504011018		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.71	0
513 EL REDONDO AVE	7504013027		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.98	0
515 EL REDONDO AVE	7504013028		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.45	0
517 EL REDONDO AVE	7504013029		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.46	0
233 N JUANITA AVE	7504013053		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.20	0
228 N IRENA AVE	7504013063		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.84	0
104 N IRENA AVE	7504016010		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1008 SPENCER ST	7504017001		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.27	0
109 N LUCIA AVE	7504018007		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1019 SPENCER ST	7504019005		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.36	0
240 N JUANITA AVE	7504019044		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.26	0
206 N JUANITA AVE	7504019098		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.78	0
208 N LUCIA AVE	7504021007		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.55	0
206 N LUCIA AVE	7504021008		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.50	0
1108 VINCENT ST A	7504021070		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.74	0
1108 VINCENT ST B	7504021071		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.60	0
144 N CATALINA AVE	7505005004		RM	R-3A	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.32	0
411 EMERALD ST	7505007022		RM	R-3A	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.18	0
116 S CATALINA AVE	7505014024		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	0
122 S CATALINA AVE	7505014026		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
124 S CATALINA AVE	7505014027		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
115 S PROSPECT AVE	7506001008		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.04	0
124 S LUCIA AVE	7506001027		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.04	0
126 S LUCIA AVE	7506001028		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.71	0
1009 GARNET ST	7506001030		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.27	0
109 S LUCIA AVE	7506002010		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
106 S JUANITA AVE	7506002022		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.67	0
108 S JUANITA AVE	7506002023		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.01	0
124 S JUANITA AVE	7506002031		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
126 S JUANITA AVE	7506002032		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.66	0
911 GARNET ST	7506002034		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.45	0
909 GARNET ST	7506002035		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.26	0
113 S JUANITA AVE	7506003010		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.14	0
103 S JUANITA AVE	7506003015		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.36	0
120 S IRENA AVE	7506003027		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.56	0
122 S IRENA AVE	7506003028		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.05	0
105 S JUANITA AVE A	7506003083		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.32	0
105 S JUANITA AVE B	7506003084		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.65	0
118 S IRENA AVE A	7506003086		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.31	0
118 S IRENA AVE B	7506003087		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.32	0
125 S IRENA AVE	7506004005		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.02	0
121 S IRENA AVE	7506004007		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.02	0
104 S HELBERTA AVE	7506004022		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
106 S HELBERTA AVE	7506004023		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
112 S HELBERTA AVE	7506004026		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	0
114 S HELBERTA AVE	7506004027		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.41	0
116 S HELBERTA AVE	7506004028		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
118 S HELBERTA AVE	7506004029		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0

Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built
120 S HELBERTA AVE	7506004030		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.12	0
122 S HELBERTA AVE	7506004031		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.18	0
124 S HELBERTA AVE	7506004032		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.27	0
123 S HELBERTA AVE	7506005004		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.29	0
101 S HELBERTA AVE	7506005015		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.95	0
223 S GUADALUPE AVE	7506008002		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.60	0
510 GARNET ST	7506008022		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.06	0
212 CAMINO REAL	7506008027		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
227 S GUADALUPE AVE	7506008030		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	4.14	0
516 GARNET ST	7506008031		RM	R-3	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
222 S FRANCISCA AVE	7506009012		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.39	0
223 S HELBERTA AVE	7506010011		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.23	0
219 S HELBERTA AVE	7506011002		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	0
209 S HELBERTA AVE	7506011007		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.19	0
207 S HELBERTA AVE	7506011008		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.62	0
210 S GUADALUPE AVE	7506011020		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	7.31	0
212 S GUADALUPE AVE	7506011021		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.09	0
211 S IRENA AVE	7506012007		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
203 S IRENA AVE	7506012011		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.17	0
214 S HELBERTA AVE	7506012020		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.20	0
216 S HELBERTA AVE	7506012021		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.46	0
218 S HELBERTA AVE	7506012022		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.40	0
205 S IRENA AVE A	7506012078		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.41	0
205 S IRENA AVE B	7506012079		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.85	0
229 S JUANITA AVE	7506015008		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.33	0
236 S IRENA AVE	7506015019		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
311 S LUCIA AVE	7506017005		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.66	0
309 S LUCIA AVE	7506017006		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.88	0
307 S LUCIA AVE	7506017007		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.67	0
313 S LUCIA AVE A	7506017036		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.33	0
313 S LUCIA AVE B	7506017037		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.30	0
215 S LUCIA AVE	7506018010		RM	R-3	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.27	0
218 S JUANITA AVE	7506018029		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
	7506018099		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	4.00	0
	7506018100		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	3.73	0
205 S PROSPECT AVE	7506019032		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.64	0
605 ESPLANADE	7508002011		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.35	0
519 S CATALINA AVE	7508005006		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
726 ESPLANADE	7508007018		RM	R-3A	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.98	0
732 S CATALINA AVE	7508008001		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.58	0
726 S CATALINA AVE	7508008004		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.45	0
724 S CATALINA AVE	7508008005		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.70	0
720 S CATALINA AVE	7508008007		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.47	0
712 S CATALINA AVE	7508008011		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
708 S CATALINA AVE	7508008013		RM	R-3A	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.74	0
707 S BROADWAY	7508008020		RM	R-3A	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.65	0
709 S BROADWAY	7508008021		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
711 S BROADWAY	7508008022		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.50	0
713 S BROADWAY	7508008023		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
207 KNOB HILL AVE	7508008031		RM	R-3A	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.28	0
629 S BROADWAY	7508009001		RM	R-3A	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.83	0
627 S BROADWAY	7508009004		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.33	0
509 S BROADWAY	7508010009		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
507 S BROADWAY	7508010010		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
417 S BROADWAY	7508011006		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.03	0
406 S BROADWAY	7508012019		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.92	0
416 S BROADWAY	7508012023		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.54	0
424 S BROADWAY	7508012027		RM	R-3A	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
504 S BROADWAY	7508013020		RM	R-3A	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.28	0
600 S BROADWAY	7508014026		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.87	0
700 S BROADWAY	7508015083		RM	R-3A	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.91	0
306 TOPAZ ST	7508015084		RM	R-3A	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.30	0
516 S GUADALUPE AVE	7508018008		RM	R-3A	17.5	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0



Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built
536 AVENUE C	7509009003		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.30	0
541 AVENUE C	7509010022		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.18	0
530 AVENUE A	7509011007		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.10	0
531 AVENUE B	7509011021		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.02	0
544 AVENUE A	7509011066		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.21	0
559 AVENUE A	7509012031		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.51	0
902 S JUANITA AVE	7509017012		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.87	0
904 S JUANITA AVE	7509017013		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.77	0
932 S JUANITA AVE	7509017019		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.17	0
1000 S JUANITA AVE	7509018013		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1104 S JUANITA AVE	7509023026		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.32	0
1108 S JUANITA AVE	7509023027		RM	R-3	17.5	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.15	0
106 AVENUE E	7511002010		RM	R-3A	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.05	0
211 AVENUE H	7511006024		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
219 AVENUE H	7511006028		RM	R-3A	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	6.68	0
202 AVENUE H	7511007023		RM	R-3A	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.59	0
1501 S CATALINA AVE	7511008001		RM	R-3A	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1503 S CATALINA AVE	7511008002		RM	R-3A	17.5	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.29	0
212 N PROSPECT AVE	7518003008		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	1952
210 N PROSPECT AVE	7518003009		RM	R-3	17.5	0.16	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.63	1952
116 N PROSPECT AVE	7518004003		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	3.16	1949
112 N PROSPECT AVE	7518004005		RM	R-3	17.5	0.14	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	1952
124 S PROSPECT AVE	7518006013		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	1943
126 S PROSPECT AVE	7518006014		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.54	0
	7518006059		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.00	1978
130 S PROSPECT AVE A	7518006060		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.33	1977
206 S PROSPECT AVE	7518007004		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.14	0
208 S PROSPECT AVE	7518007005		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.07	0
200 S PROSPECT AVE	7518007054		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
202 S PROSPECT AVE A	7518007056		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.50	0
202 S PROSPECT AVE B	7518007057		RM	R-3	17.5	0.15	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.09	0
2510 GRANT AVE	4157017007		RM	R-3	17.5	0.26	Residential	Used in Prior Housing Element - Non-Vacant		2		2	2	0.85	0
217 S PROSPECT AVE	7506019007		RM	R-3	17.5	0.29	Residential	Used in Prior Housing Element - Non-Vacant		2		2	2	0.34	0
2705 CARNEGIE LN	4082002042		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.48	0
2705 GRANT AVE	4082008003		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.21	0
2712 CARNEGIE LN	4082009007		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.13	0
2701 ROCKEFELLER LN	4082009014		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.87	0
2717 CARNEGIE LN	4082011039		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.42	0
2713 CARNEGIE LN	4082011068		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.00	0
2515 GATES AVE	4153014013		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.35	0
2514 RUHLAND AVE	4153017036		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.34	0
2510 RUHLAND AVE	4153017038		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2609 MATHEWS AVE A	4153022052		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	4.00	0
2609 MATHEWS AVE B	4153022053		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	3.98	0
2609 MATHEWS AVE C	4153022054		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	3.96	0
2601 RUHLAND AVE	4153024013		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.00	0
2602 VOORHEES AVE A	4153024080		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.88	0
2602 VOORHEES AVE B	4153024081		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.10	0
2602 VOORHEES AVE C	4153024082		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.91	0
2614 CURTIS AVE	4153025005		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2609 VOORHEES AVE	4153025017		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	0
2621 CURTIS AVE	4153026022		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.41	0
2618 GRAHAM AVE	4153027003		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
2700 GATES AVE	4153030005		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.21	0
2700 CURTIS AVE	4153030015		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.44	0
2707 RUHLAND AVE	4153031024		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.21	0
2015 MATHEWS AVE	4155027018		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.17	0
2001 MATHEWS AVE	4155027028		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.48	0
1932 MATHEWS AVE	4155029002		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1930 MATHEWS AVE	4155029003		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.13	0
1928 MATHEWS AVE	4155029004		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.61	0
1926 MATHEWS AVE	4155029005		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
2018 MATHEWS AVE	4155030003		RM	R-3	17.5	0.18	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.45	0

Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/ FAR	Imp-Land Ratio	Year Built
2117 VANDERBILT LN	4156001053		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.11	0
2106 CARNEGIE LN	4156009009		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.35	0
2119 ROCKEFELLER LN	4156009022		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.24	0
1605 FLAGLER LN	4156013031		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.00	0
2114 ROCKEFELLER LN	4156016005		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2121 GRANT AVE	4156016023		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.01	0
2022 GRANT AVE	4156018001		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.18	0
2018 GRANT AVE	4156018003		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.52	0
1914 GRANT AVE	4156019005		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.67	0
2515 VANDERBILT LN	4157001016		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	37.61	0
2215 CARNEGIE LN	4157005021		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.15	0
2217 CARNEGIE LN	4157005022		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	3.39	0
2512 CARNEGIE LN	4157009006		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.05	0
2412 CARNEGIE LN	4157010006		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.26	0
2411 ROCKEFELLER LN	4157010019		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2201 ROCKEFELLER LN	4157012014		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.90	0
2400 HADLEY LN	4158004019		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
2420 IVES LN	4158006002		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.32	0
829 N LUCIA AVE	7502001002		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.20	0
	7502001003		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.00	0
831 N LUCIA AVE	7502001004		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.24	0
704 N LUCIA AVE	7502005028		RM	R-3	17.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.61	0
700 N LUCIA AVE	7502005029		RM	R-3	17.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.97	0
617 N IRENA AVE	7503020026		RM	R-3	17.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.22	0
222 N BROADWAY	7505008052		RM	R-3A	17.5	0.18	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.57	0
119 S GUADALUPE AVE	7506006012		RM	R-3	17.5	0.21	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.09	0
105 S GUADALUPE AVE	7506006019		RM	R-3	17.5	0.21	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.41	0
204 S LUCIA AVE	7506019018		RM	R-3	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.16	0
709 ESPLANADE	7508001096		RM	R-3A	17.5	0.18	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.43	0
611 ESPLANADE	7508002009		RM	R-3A	17.5	0.21	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.23	0
607 ESPLANADE	7508002010		RM	R-3A	17.5	0.21	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.04	0
603 ESPLANADE	7508002012		RM	R-3A	17.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.54	0
526 S GUADALUPE AVE	7508018013		RM	R-3A	17.5	0.19	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.07	0
1006 S CATALINA AVE	7509007018		RM	R-3A	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
1008 S CATALINA AVE	7509007019		RM	R-3A	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.28	0
1409 S CATALINA AVE	7511002023		RM	R-3A	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.06	0
1406 S CATALINA AVE	7511005020		RM	R-3A	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
201 AVENUE G	7511005022		RM	R-3A	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.09	0
1404 S CATALINA AVE A	7511005086		RM	R-3A	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.02	0
1404 S CATALINA AVE B	7511005087		RM	R-3A	17.5	0.17	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	1.48	0
417 BERYL ST	7503010001		RM	R-3A(H)	17.5	0.41	Residential	Used in Prior Housing Element - Non-Vacant		3		3	3	0.16	0
717 ESPLANADE	7508001085		RM	R-3A	17.5	0.27	Residential	Used in Prior Housing Element - Non-Vacant		3		3	1	0.98	0
529 S CATALINA AVE	7508005002		RM	R-3A	17.5	0.29	Residential	Used in Prior Housing Element - Non-Vacant		3		3	1	0.13	0
114 S CATALINA AVE	7505014066		RM	R-3A	17.5	0.41	Residential	Used in Prior Housing Element - Non-Vacant		4		4	2	0.55	0
2102 AVIATION WAY	4155028017		RM	R-3	17.5	0.34	Residential	Used in Prior Housing Element - Non-Vacant		4		4	1	0.63	0
2019 VANDERBILT LN	4156002016		RM	R-3	17.5	0.34	Residential	Used in Prior Housing Element - Non-Vacant		4		4	1	0.00	0
2600 NELSON AVE	4153022028		RM	R-3	17.5	1.03	Residential	Used in Prior Housing Element - Non-Vacant		9		9	5	1.34	0
	4083015022		RM	R-3	17.5	1.02	Residential	Used in Prior Housing Element - Non-Vacant		12		12	2	0.00	0
2829 190TH ST	4083015010		RM	R-3	17.5	1.28	Residential	Used in Prior Housing Element - Non-Vacant		13		13	5	0.61	0
109 N PACIFIC COAST HWY	7505007009		RH	RH-2	30	0.07	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	2.52	0
131 N PACIFIC COAST HWY	7505007017		RH	RH-2	30	0.07	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.18	0
133 N PACIFIC COAST HWY	7505007018		RH	RH-2	30	0.09	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.79	0
415 EMERALD ST	7505007029		RH	RH-2	30	0.07	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
417 EMERALD ST	7505007030		RH	RH-2	30	0.07	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.75	0
319 GARNET ST	7505012002		RH	RH-3	30	0.07	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
110 N PACIFIC COAST HWY	7505010022		RH	RH-2	30	0.15	Residential	Used in Prior Housing Element - Non-Vacant		2		2	2	0.67	0
108 N PACIFIC COAST HWY	7505010023		RH	RH-2	30	0.13	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.21	0
115 N PACIFIC COAST HWY	7505007011		RH	RH-2	30	0.15	Residential	Used in Prior Housing Element - Non-Vacant		3		3	1	0.06	0
737 ESPLANADE	7508001098		RMH	RMD	23.3	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.54	0
115 RUBY ST	7508004002		RMH	RMD	23.3	0.09	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.43	0
111 SAPPHIRE ST	7508005027		RMH	RMD	23.3	0.09	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.25	0
627 S CATALINA AVE	7508006002		RMH	RMD	23.3	0.09	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.47	0
624 ESPLANADE	7508006023		RMH	RMD	23.3	0.10	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.29	0

Table B-1: RHNA Sites Not Requiring Rezoning

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Existing Units/FAR	Imp-Land Ratio	Year Built
630 ESPLANADE	7508006025		RMH	RMD	23.3	0.11	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.42	0
1400 ESPLANADE	7511002029		RMH	RMD	23.3	0.12	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.71	0
2116 MANHATTAN BEACH BLVD	4150002035		RMH	RMD	23.3	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.44	0
124 SAPPHIRE ST	7508006012		RMH	RMD	23.3	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.57	0
114 SAPPHIRE ST	7508006014		RMH	RMD	23.3	0.13	Residential	Used in Prior Housing Element - Non-Vacant		1		1	1	0.52	0
810 ESPLANADE	7509001033		RMH	RMD	23.3	0.15	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	2.60	0
1506 ESPLANADE	7511008009		RMH	RMD	23.3	0.17	Residential	Used in Prior Housing Element - Non-Vacant		2		2	1	0.48	0
128 N BROADWAY	7505007028		RH	RH-3	30	0.75	Church Parking (est. 0.25 ac)	Not Used in Prior Housing Element			6	6	0		
126 N PACIFIC COAST HWY	7505010015 A		RH	RH-2	30	1.10	Church Parking (est. 0.50 ac)	Not Used in Prior Housing Element	12			12	0		
122 N PACIFIC COAST HWY	7505010035 A		RM	R-3	17.5	0.30	Church Building	Not Used in Prior Housing Element				0	0		
511 EMERALD ST	7505010038		RM	R-3	17.5	0.73	Church Parking (est. 0.25 ac)	Not Used in Prior Housing Element		4		4	0		
121 S PACIFIC COAST HWY	7505012012 B		RH	RH-3	30	0.17	Church Building	Not Used in Prior Housing Element				0	0		
103 S PACIFIC COAST HWY	7505012025 B		RH	RH-3	30	0.09	Church Building	Not Used in Prior Housing Element				0	0		
	7505012026 B		RH	RH-3	30	0.68	Church Building	Not Used in Prior Housing Element				0	0		
102 S BROADWAY	7505013015 B		RM	R-3A	17.5	0.69	Church Parking (est. 0.50 ac)	Not Used in Prior Housing Element		16		16	1		
200 S PACIFIC COAST HWY	7505020015		MU	MU-2	35	0.18	Older Commercial	Used in Prior Housing Element - Non-Vacant		5		5		0.43	1968
317 TORRANCE BLVD	7505020033		MU	MU-2	35	0.18	Older Commercial	Used in Prior Housing Element - Non-Vacant		5		5		0.76	1962
326 S PACIFIC COAST HWY	7505021023		MU	MU-2	35	0.17	Office (Pacific Bay Construction)	Used in Prior Housing Element - Non-Vacant		5		5		0.68	1972
315 S PACIFIC COAST HWY	7505022011		MU	MU-2	35	0.17	Older Commercial	Used in Prior Housing Element - Non-Vacant		5		5		0.01	1940
319 S PACIFIC COAST HWY	7505022031		MU	MU-2	35	0.17	Trimline Auto (nonconforming)	Used in Prior Housing Element - Non-Vacant		5		5		0.42	1963
209 S PACIFIC COAST HWY UN	7505019008		MU	MU-2	35	0.26	Commercial (Retail Stores)	Used in Prior Housing Element - Non-Vacant		7		7		0.43	1955
308 TORRANCE BLVD	7505021033		MU	MU-2	35	0.25	Commercial (Retail Stores)	Used in Prior Housing Element - Non-Vacant		7		7		0.25	1969
231 S PACIFIC COAST HWY	7505019063		MU	MU-2	35	0.43	Commercial (Retail Stores)	Used in Prior Housing Element - Non-Vacant		12		12		0.44	1955



Table B-2: RHNA Sites Requiring Rezoning

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Existing Units/FAR	Imp-Land Ratio	Year Built
REDONDO BI	1923 CONDON AVE	90278	4082013017				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1913
REDONDO BI	1921 CONDON AVE	90278	4082013018				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.33	1953
REDONDO BI	1919 CONDON AVE	90278	4082013019				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.07	1973
REDONDO BI	1917 CONDON AVE	90278	4082013020				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1973
REDONDO BI	1915 CONDON AVE	90278	4082013021				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.31	1965
REDONDO BI	1913 CONDON AVE	90278	4082013022				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1952
REDONDO BI	1911 CONDON AVE	90278	4082013023				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1978
REDONDO BI	1909 CONDON AVE	90278	4082013024				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.53	1965
REDONDO BI	1907 CONDON AVE	90278	4082013025				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.77	1965
REDONDO BI	1905 CONDON AVE	90278	4082013026				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.82	1986
REDONDO BI	1903 CONDON AVE	90278	4082013027				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1986
REDONDO BI	1901 CONDON AVE	90278	4082013028				1		0.09	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1986
REDONDO BI	1902 CONDON AVE	90278	4082014002				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1986
REDONDO BI	1904 CONDON AVE	90278	4082014003				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.06	1987
REDONDO BI	1906 CONDON AVE	90278	4082014004				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.27	1987
REDONDO BI	1908 CONDON AVE	90278	4082014005				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1990
REDONDO BI	1924 CONDON AVE	90278	4082014013				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1952
REDONDO BI	1923 FIRMONA AVE	90278	4082014014				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1973
REDONDO BI	1921 FIRMONA AVE	90278	4082014015				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.37	1972
REDONDO BI	1919 FIRMONA AVE	90278	4082014016				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.27	1934
REDONDO BI	1917 FIRMONA AVE	90278	4082014017				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.31	1973
REDONDO BI	1915 FIRMONA AVE	90278	4082014018				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1973
REDONDO BI	1913 FIRMONA AVE	90278	4082014019				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1973
REDONDO BI	1911 FIRMONA AVE	90278	4082014020				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1973
REDONDO BI	1909 FIRMONA AVE	90278	4082014021				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.35	1973
REDONDO BI	1907 FIRMONA AVE	90278	4082014022				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1973
REDONDO BI	1905 FIRMONA AVE	90278	4082014023				1		0.07	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1972
REDONDO BI	1901 FIRMONA AVE	90278	4082014024				2		0.15	RSF	R-1	RH	RH	20	30	2	Non-Vacant	Residential	2	0.13	1979
REDONDO BI	1900 CONDON AVE	90278	4082014001				2		0.12	RSF	R-1	RH	RH	20	30	2	Non-Vacant	Residential	1	0.49	1987
REDONDO BI	1813 FIRMONA AVE	90278	4082016005				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1984
REDONDO BI	1811 FIRMONA AVE	90278	4082016006				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1985
REDONDO BI	1815 FIRMONA AVE	90278	4082016008				2		0.13	RSF	R-1	RH	RH	20	30	2	Non-Vacant	Residential	1	0.49	1987
REDONDO BI	1820 FIRMONA AVE	90278	4082017003				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1990
REDONDO BI	1818 FIRMONA AVE	90278	4082017004				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.43	1990
REDONDO BI	1813 KINGSDALE AVE	90278	4082017011				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	0
REDONDO BI	1815 KINGSDALE AVE	90278	4082017012				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1946
REDONDO BI	1817 KINGSDALE AVE	90278	4082017013				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.37	1941
REDONDO BI	1819 KINGSDALE AVE	90278	4082017014				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1972
REDONDO BI	1821 KINGSDALE AVE	90278	4082017015				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.11	1973
REDONDO BI	1823 KINGSDALE AVE	90278	4082017016				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.25	1948
REDONDO BI	1816 FIRMONA AVE	90278	4082017020				1		0.10	RSF	R-1	RH	RH	20	30	1	Non-Vacant	Residential	1	0.35	1955
REDONDO BI	1908 FIRMONA AVE	90278	4082015008				2		0.13	RM	R-3	RH	RH	20	30	2	Non-Vacant	Residential	1	1.15	0
REDONDO BI	1900 FIRMONA AVE	90278	4082015012				4		0.20	RM	R-3	RH	RH	20	30	4	Non-Vacant	Residential	1	0.25	0
REDONDO B	1998 S PACIFIC COAS	90277	7510031004	21				Shortfall of Sites	0.87	MU	MU-1	MU	MU-1	20	30	21	Non-Vacant	Low density, older commercial uses with large adjacent surface parking lots.	0.14	0.23	1957
REDONDO B	1900 S PACIFIC COAS	90277	7510031007					Shortfall of Sites	0.45	MU	MU-1	MU	MU-1	20	30	11	Non-Vacant	Older Commercial	0.34	0.44	1986
REDONDO B	1930 S PACIFIC COAS	90277	7510031029					Shortfall of Sites	0.45	MU	MU-1	MU	MU-1	20	30	11	Non-Vacant	Older Commercial	0.23	0.02	1981
REDONDO B	1890 S PACIFIC COAS	90277	7510032046	0				Shortfall of Sites	0	MU	MU-1	MU	MU-1	20	30	0	Non-Vacant	Low density, older commercial uses with large adjacent surface parking lots.	0.1	0.28	1969
REDONDO B	1870 S PACIFIC COAS	90277	7510032050	36				Shortfall of Sites	1.52	MU	MU-1	MU	MU-1	20	30	36	Non-Vacant	Older Commercial	0.11	0.20	1964
REDONDO B	1880 S PACIFIC COAS	90277	7510032054	47				Shortfall of Sites	1.95	MU	MU-1	MU	MU-1	20	30	47	Non-Vacant	Older Commercial	0.3	1.00	1963
REDONDO BI	1933 FIRMONA AVE	90278	4082013007				6	Shortfall of Sites	0.12	RSF	R-1	C-4-R	C-4-R	20	55	6	Non-Vacant	Consolidated as part of Kingsdale property	1	0.25	1986
REDONDO BI	1931 FIRMONA AVE	90278	4082013008				5	Shortfall of Sites	0.12	RSF	R-1	C-4-R	C-4-R	20	55	5	Non-Vacant	Consolidated as part of Kingsdale property	2	0.83	1929
REDONDO BI	1939 CONDON AVE	90278	4082013009				4	Shortfall of Sites	0.07	RSF	R-1	C-4-R	C-4-R	20	55	4	Non-Vacant	Consolidated as part of Kingsdale property	1	0.25	1988
REDONDO BI	1937 CONDON AVE	90278	4082013010				4	Shortfall of Sites	0.08	RSF	R-1	C-4-R	C-4-R	20	55	4	Non-Vacant	Consolidated as part of Kingsdale property	1	0.25	1988
REDONDO BI	1935 CONDON AVE	90278	4082013011				6	Shortfall of Sites	0.12	RSF	R-1	C-4-R	C-4-R	20	55	6	Non-Vacant	Consolidated as part of Kingsdale property	1	0.25	1990
REDONDO BEACH		90278	4082013012				4	Shortfall of Sites	0.09	RSF	R-1	C-4-R	C-4-R	20	55	4	Non-Vacant	Consolidated as part of Kingsdale property	1		
REDONDO BEACH		90278	4082013005				5	Shortfall of Sites	0.09	C-4	C-4	C-4-R	C-4-R	20	55	5	Non-Vacant	Consolidated as part of Kingsdale property	0.48	0.08	1983
REDONDO BEACH		90278	4082013006				7	Shortfall of Sites	0.12	C-4	C-4	C-4-R	C-4-R	20	55	7	Non-Vacant	Consolidated as part of Kingsdale property	0.37	0.06	1983
REDONDO BI	2810 ARTESIA BLVD	90278	4082013029				22	Shortfall of Sites	0.39	C-4	C-4	C-4-R	C-4-R	20	55	22	Non-Vacant	Consolidated as part of Kingsdale property	0.11	1.16	1983
REDONDO BI	1959 KINGSDALE AVE	90278	4082015015				26	Shortfall of Sites	0.46	C-4	C-4	C-4-R	C-4-R	20	55	26	Non-Vacant	Consolidated as part of Kingsdale property	0.1	1.83	1983
REDONDO BI	2850 ARTESIA BLVD	90278	4082015016	18			15	Shortfall of Sites	0.59	C-4	C-4	C-4-R	C-4-R	20	55	33	Non-Vacant	Consolidated as part of Kingsdale property	0.08	4.64	1983
REDONDO BI	1910 FIRMONA AVE	90278	4082015007				3	Shortfall of Sites	0.13	R-3	R-3	C-4-R	C-4-R	20	55	3	Non-Vacant	Consolidated as part of Kingsdale property	6	0.50	1964
REDONDO BI	4001 INGLEWOOD AV	90278	4149005040	44				178 Shortfall of Sites	5.05	C-4	C-4	C-4-R	C-4-R	20	55	222	Non-Vacant	Site C: Single-story retail - VON's Shopping Center (20% lower income)	0.37	1.00	1993
REDONDO BI	4051 INGLEWOOD AV	90278	4149005041	26				106 Shortfall of Sites	2.99	C-4	C-4	C-4-R	C-4-R	20	55	132	Non-Vacant	Site C: Single-story retail - VON's Shopping Center (20% lower income)	0.05	0.34	1993
REDONDO BI	2301 190th St	90278	4158010021	45				Shortfall of Sites	1.03	I-2	I-2	I-2-R	I-2-R	20	55	45	Non-Vacant	Site D: Older industrial use (two tenants closed)	0.39	0.32	1954
REDONDO BI	598 Meyer Ln	90278	4158010019	45				Shortfall of Sites	1.02	I-2	I-2	I-2-R	I-2-R	20	55	45	Non-Vacant	Site D: Light manufacturing (welding)	0.46	0.23	1956
REDONDO BI	512 Meyer Ln	90278	4158010020	44				Shortfall of Sites	1.01	I-2	I-2	I-2-R	I-2-R	20	55	44	Non-Vacant	Site D: Light manufacturing (recording)	0.51	2.73	1974

Table B-2: RHNA Sites Requiring Rezoning

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Existing Units/ FAR	Imp-Land Ratio	Year Built
REDONDO BEACH	553 Mary Ann Dr	90278	4158011011	13				Shortfall of Sites	0.30	I-2	I-2	I-2-R	I-2-R	20	55	13 Non-Vacant	Site D: Warehousing use	0.25	0.23	1976	
REDONDO BEACH	575 Mary Ann Dr	90278	4158011012	12				Shortfall of Sites	0.27	I-2	I-2	I-2-R	I-2-R	20	55	12 Non-Vacant	Site D: Light manufacturing (window treatment)	0.47	0.35	1976	
REDONDO BEACH	601 Mary Ann Dr	90278	4158011007	11				Shortfall of Sites	0.24	I-2	I-2	I-2-R	I-2-R	20	55	11 Non-Vacant	Site D: Light manufacturing	0.49	2.86	1973	
REDONDO BEACH	615 Mary Ann Dr	90278	4158011006	11				Shortfall of Sites	0.24	I-2	I-2	I-2-R	I-2-R	20	55	11 Non-Vacant	Site D: Light manufacturing	0.31	1.21	1960	
REDONDO BEACH	621 Mary Ann Dr	90278	4158011005	11				Shortfall of Sites	0.24	I-2	I-2	I-2-R	I-2-R	20	55	11 Non-Vacant	Site D: Misc (food preparation, learning center, etc.)	0.23	0.21	1962	
REDONDO BEACH	631 Mary Ann Dr	90278	4158011010	21				Shortfall of Sites	0.48	I-2	I-2	I-2-R	I-2-R	20	55	21 Non-Vacant	Site D: Misc (food preparation, learning center, etc.)	0.48	0.08	1963	
REDONDO BEACH	524 Mary Ann Dr	90278	4158012026	23				Shortfall of Sites	0.52	I-2	I-2	I-2-R	I-2-R	20	55	23 Non-Vacant	Site D: Auto warehousing use	0.34	0.27	1953	
REDONDO BEACH	620 Mary Ann Dr	90278	4158012031	34				Shortfall of Sites	0.78	I-2	I-2	I-2-R	I-2-R	20	55	34 Non-Vacant	Site D: Construction equipment, auto repairs	0.21	0.11	1959	
REDONDO BEACH	630 Mary Ann Dr	90278	4158012025	11				Shortfall of Sites	0.25	I-2	I-2	I-2-R	I-2-R	20	55	11 Non-Vacant	Site D: Auto related use	0.65	0.90	1961	
REDONDO BEACH	2408 Fisk Ln	90278	4158012024	11				Shortfall of Sites	0.25	I-2	I-2	I-2-R	I-2-R	20	55	11 Non-Vacant	Site D: Light manufacturing (plumbing)	0.41	0.82	1985	
REDONDO BEACH	18989 Hawthorne Blvd	90278	4083014017	39				Shortfall of Sites	0.88	C-2	C-2	C-2-R	C-2-R	20	55	39 Non-Vacant	Site D: Retail (Lamp Plus)	0.33	5.83	1980	
REDONDO BEACH		90278	4082020810	273				Shortfall of Sites	6.21	I-2	I-2	IF-R	IF-2	20	55	273 Non-Vacant	Largely vacant surface parking and storage	0.06	0.00	0	
REDONDO BEACH																	Old light industrial uses such as printer repairs; Class C building indicating substantial renovation is needed				
REDONDO BEACH	1601 Kingsdale Ave	90278	4082019037	114				Shortfall of Sites	2.58	I-3	IC-1	IF-R	IF-2	20	55	114 Non-Vacant	renovation is needed	0.21	2.42	1973	
REDONDO BEACH																	Only 3.56 acre of parking used for estimating potential; existing retail uses; Class C building				
REDONDO BEACH	1519 Hawthorne Blvd	90278	4082019042	157				Shortfall of Sites	6.01	CR	CR	CR-R	CR-R	20	55	157 Non-Vacant	potential; existing retail uses; Class C building	0.36	1.03	1972	
REDONDO BEACH																	Only 1.42 acres of parking used for estimating potential; existing retail uses; Class C building				
REDONDO BEACH	1505 Hawthorne Blvd	90278	4082019048	62				Shortfall of Sites	3.95	CR	CR	CR-R	CR-R	20	55	62 Non-Vacant	potential; existing retail uses; Class C building	0.15	5.49	1975	
REDONDO BEACH																	Only 4.27 acre of parking used for estimating potential; existing retail uses; Class C building				
REDONDO BEACH		90278	4082019049	188				Shortfall of Sites	4.72	CR	CR	CR-R	CR-R	20	55	188 Non-Vacant	potential; existing retail uses; Class C building	0.1	0.08	1975	
REDONDO BEACH	1770 S PACIFIC COAST	90277	7510030061	31				Shortfall of Sites	0.7	MU	MU-1	MU-1-R	MU-1-R	20	55	31 Non-Vacant	Closed FedEx Office	0.29	0.34	1977	
REDONDO BEACH	1760 S PACIFIC COAST	90277	7510030062	49				Shortfall of Sites	1.12	MU	MU-1	MU-1-R	MU-1-R	20	55	49 Non-Vacant	Lens Crafter - underutilization of site	0.24	0.25	1972	



## **Appendix C: Public Participation**

The General Plan update began in 2017-2018 with the appointment of a 27-member General Plan Advisory Committee (GPAC). Five members from each City Council District with two members including the Chair were appointed by the Mayor. To date the GPAC has held 22 meetings. Additionally, there have been three community wide meetings and multiple public hearings before the Planning Commission and City Council. Housing and mixed use development, and specifically where and at what densities, has been the most pressing topic throughout the process. As the City began to formulate the land plan it became clear that housing was the most critical issue facing the City going forward. Significant education and outreach was required in order to set the stage for updating the City's Housing Element. The Housing Element team as well as other planning and economic development professionals were critical to educating the community on the importance of providing housing in support of all incomes throughout the City.

Prior to the development of the City's Draft Housing Element, the pandemic occurred. This severely limited the City's in-person community engagement capabilities from March of 2020 to the present. The plan to engage specifically on the Housing Element with a variety of public input tools was not possible due to the pandemic and associated restrictions for gatherings. Although technology to coordinate large scale zoom type meetings and other input have been difficult to draw input on such complex topics as housing and RHNA, the City did host a community meeting with a SocialPinpoint interactive tool to engage the public. That one meeting had close to 200 attendees, not including those who may have watched the informational meeting on YouTube or the City's live stream. The SocialPinpoint tool allowed very specific feedback on housing and other land uses. As well, there were dozens of attendees at the Planning Commission and City Council Meetings specifically to comment on the housing and land use discussion. Those without zoom capabilities could also watch the livestream via YouTube or the City's live stream and could submit e-comments through the City's website.

Despite the meeting limitations due to the pandemic, housing has dominated the City's business more than any other singular topic over the past two years. This was necessary to set the stage and create the appropriate environment for any additional communications with the housing industry and specifically affordable housing providers. The City, with the help of Housing Element and General Plan consultants, has successfully elevated the need for affordable housing with the community, as well as elected and appointment officials. This is demonstrated by the City's ongoing effort to study additional affordable housing opportunities as part of a citywide initiative for inclusionary housing and the development and installation (with plans for expansion) of a homeless pallet program.

The City also met with some key property owners and developers – Beach City Health District, Northrup Grumman, Kingsdale property, South Bay Galleria, and the AES power plant that is slated to decommission during the 6<sup>th</sup> cycle Housing Element planning period.

The City plans to embrace the affordable housing community of professionals as a critical next step and welcomes HCD to support and engage with the City in this process. The City will include any additional programs and actions to this effect in this Housing Element.

Furthermore, the City continues to engage the public through the Housing Element approval/adoption process. City staff is proactively reaching out to property owners within the proposed Housing Overlay. For the Planning Commission and City Council meetings, the City conducted the following:

- Email blast to residents subscribed to receive City updates on the General Plan update (1,229 subscribers)
- Updates to Facebook social media
- Created a dedicated webpage for each access to the Draft Housing Element ([www.redondo.org/HousingElement](http://www.redondo.org/HousingElement))
- Created a dedicated email address for public comment ([RBHousingElement@redondo.org](mailto:RBHousingElement@redondo.org))
- Email blasts were also shared with GPAC members and City Council members, for them to share with residents/constituents
- Mailing notice to government agencies and local developers
- Contacting property owners of properties recommended for rezoning to add residential overlays/uses

## **Outreach**

The City advertises the public meetings via press releases, FaceBook posts, email blasts, posting on the City's General Plan Update landing page which has collected 1,200 email addresses for notification, as well as the City's Community Services Newsletter that is sent to over 11,000 email addresses.

The General Plan GPAC Ambassadors reached out to groups such as Beach City Health District, Salvation Army, Redondo Beach Chamber of Commerce, Redondo Beach Unified School District, and North Redondo Beach Business Association. The Beach City Health District serves the special needs groups of seniors and persons with disabilities. The Salvation Army serves low and moderate income persons and persons experiencing homelessness. Other stakeholders consulted for the Housing Element also included property owners representing the Northrop Grumman, South Bay Galleria, Kingsdale properties, and AES power plant that is slated for closure. The Housing Rights Center was also consulted for fair housing records.

## **Community Workshop (November 17, 2018)**

At this Community Workshop, the City discussed a series of General Plan topics, including: housing for the future; new housing bills passed that affect the Housing Element. Five main topics or trends rose to the top of priority list to address in the General Plan:

- Population growth
- Aging population/loss of working-age population

- Housing affordability
- Changes in the retail environment
- Availability of jobs in the City

### **GPAC Meeting (December 3, 2020)**

Since the November 2018 Community Workshop, the GPAC met five additional times to develop the GPAC Recommended Land Use Plan that outlines specific land use changes in target areas. However, with the release of the Draft RHNA and the City's unsuccessful appeal to SCAG to lower the RHNA, the GPAC Recommended Land Use Plan would not offer adequate capacity to accommodate the City's RHNA. The GPAC met on December 3, 2020 to revisit the Land Use Plan. During the meeting, the impacts of new State laws (SB 330, AB 1397, and SB 166) were explained. GPAC voted on modifications to the original GPAC Recommended Land Use Plan to introduce additional housing opportunities in the City. Specifically, the GPAC's approach to land use includes:

- Retaining existing residential neighborhoods and principal commercial districts
- Allowing for infill development and recycling of uses with compatible development (function and scale)
- Allowing for changes of use on selected sites (Focus Areas) versus Citywide to accommodate housing requirements and improve their economic viability
- Allowing for modest intensification of key sites that are underutilized or contain marginal uses

### **City Council Inclusionary Housing Presentation (January 12, 2021)**

As part of the Housing Element update, the City is also undertaking a feasibility study for inclusionary housing. On January 12, 2021, the City Council received a presentation on inclusionary housing and provided staff and consultant direction on the parameters for testing feasibility.

### **Community Workshop (April 7, 2021)**

The City conducted a Community Workshop to receive community input on the Revised GPAC Recommended Land Use Plan. A total of 165 participants registered for the meeting. The community was generally concerned about the significant number of units that the City is mandated to plan for. There was strong emphasis from community members to distribute the new units throughout the City.

### **Social PinPoint (April 7 – April 11, 2021)**

Prior to the April 15, 2021 Planning Commission meeting, the City collected community input via Social Pinpoint between April 7 and April 11, 2021. Overall, 349 comments were collected via Social PinPoint on the Revised Land Use Plan, with the majority of the comments focusing on the residential and mixed use designations. The need to distribute housing throughout the City was emphasized.

### **Planning Commission Meeting (April 15, 2021)**

The Planning Commission received public input on the Revised GPAC Recommended Land Use Plan and worked on balancing community input and achieving the RHNA. The Planning Commission provided recommendations for consideration by the City Council, including increasing density at specific locations and adding sites to the Residential Overlay.

### **City Council Meetings (April 20, May 4, May 18, and June 15, 2021)**

The City Council considered the Housing Element, RHNA, and adequate sites requirements over multiple meetings. The April 20 meeting was dedicated on receiving public input. After consideration of extensive community input, the Council provided staff direction on the strategy for achieving RHNA. On June 15, 2021, the Council was presented a summary of the sites strategy for RHNA and an overview of housing programs to be included in the Draft Housing Element.

### **Planning Commission Meeting (September 16, 2021)**

The City conducted a meeting before the Planning Commission to review the revised Draft Housing Element that responded to comments from HCD.

### **City Council Meeting (October 5, 2021)**

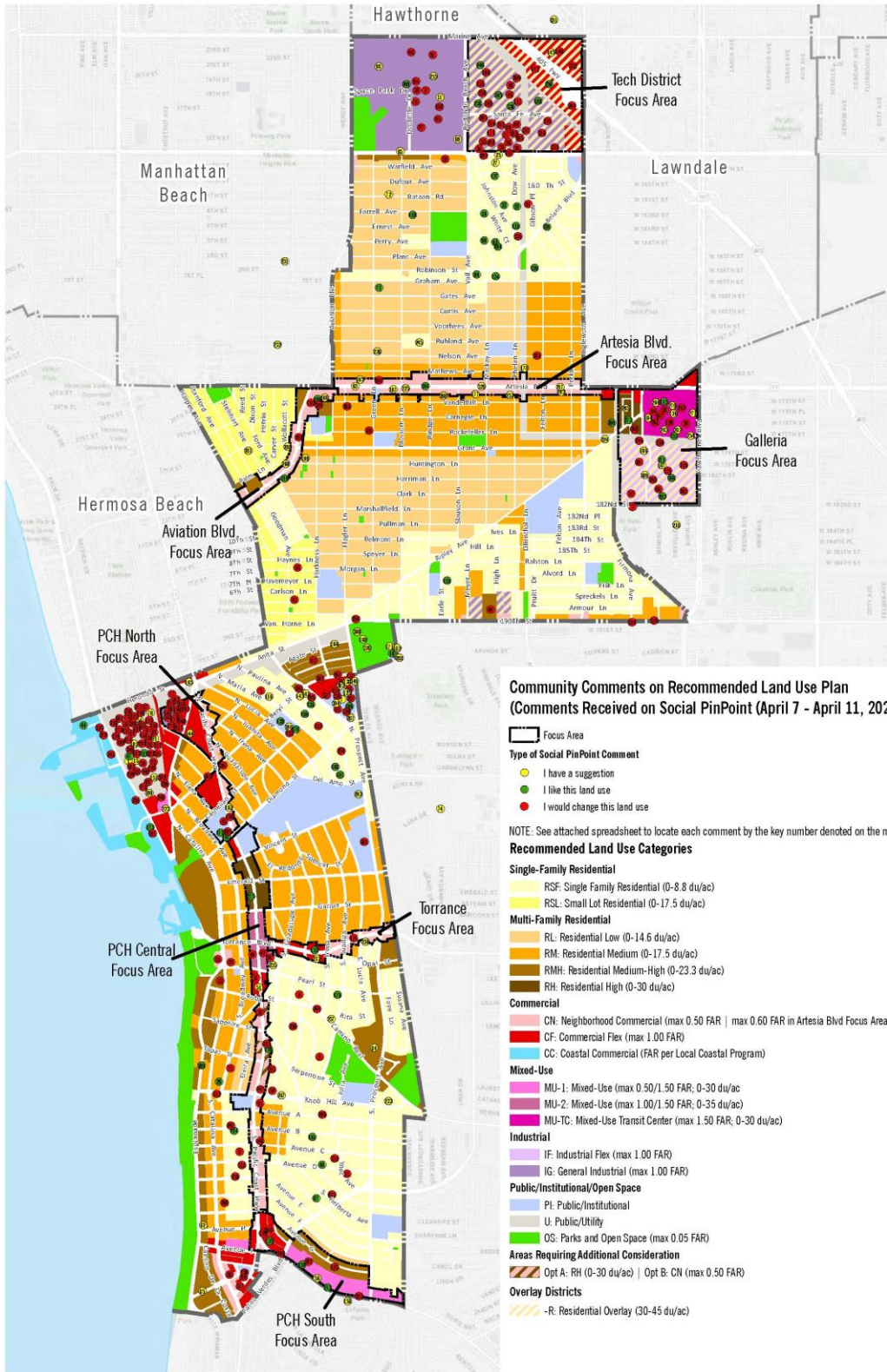
The City Council conducted a public hearing to receive public input and adopted the Housing Element. At the meeting, the City emphasized that the Housing Element is a policy document and adoption of the Housing Element does not authorize construction or redesignate/rezone properties identified in the sites inventory. Therefore a Negative Declaration was determined to be an appropriate level of CEQA clearance. The City will be conducting an Environmental Impact Report (EIR) when the Land Use Element with the recommended land use plan changes are processed.

### **City Council Meeting (February 1, 2022)**

The City Council conducted a public hearing to receive public input and adopted the revised Housing Element. In addition, the City's outreach program noted above, local housing advocates and agencies and individuals who had previously commented on the Housing Element were invited to attend the February 1, 2022 public hearing.

### **City Council Meeting (February 8, 2022)**

The City Council continued the February 1, 2022 public hearing to February 8, 2022 in order to receive additional public input before adopting the revised Housing Element. As noted under the February 1, 2022 meeting listed above, the City invited local housing advocates and agencies and individuals who had previously commented on the Housing Element to attend the public hearing.



## Notice of Availability of the Draft Housing Element

The City issued a Notice of Availability on July 7, announcing the availability of the Draft Housing Element for review. The City prepared a flyer in English and Spanish to announce the availability of the Draft Housing Element for public review. The flyer was sent to agencies and organizations that serve low and moderate income residents and those with special needs, market-rate and affordable housing developers, affordable housing projects and mobile home parks, among other community groups.

During the Housing Element development and approval processes, the City had received numerous comments from property owners, developers, residents, and housing advocates. The City has prepared summary responses to these comments.

## **Appendix D: Affirmatively Furthering Fair Housing**

### **D.1 Introduction and Overview of AB 686**

In January 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- a summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity;
- an analysis of segregation patterns and disparities in access to opportunities;
- an assessment of contributing factors; and
- an identification of fair housing goals and actions.

The AFFH rule was originally a federal requirement applicable to entitlement jurisdictions (with population over 50,000) that can receive HUD Community Planning and Development (CPD) funds directly from HUD. Before the 2016 federal rule was repealed in 2019, entitlement jurisdictions were required to prepare an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI). AB 686 states that jurisdictions can incorporate findings from either report into the Housing Element.

### **D.2 Assessment of Fair Housing Issues**

#### **A. Fair Housing Enforcement and Outreach**

##### **Fair Housing Programs**

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 housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. The Housing Rights Center has a main office location in downtown Los Angeles. The City of Redondo Beach provides links to all of the Housing Rights Center’s brochures on their Fair Housing Informational city web page, which include information on rights of households with different characteristics such as disability and family size/type, as well as providing information for landlords.

Between 2018 and 2021, the HRC served 283 Redondo Beach residents ([Table D-1](#)). Out of the all the residents served a majority of the clients identified as being non-Hispanic. As well as the HRC, HUD maintains a record of all housing discrimination complaints filed in local



jurisdictions. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. According to the Regional AI, from October 1, 2014 to September 30, 2019, 968 fair housing complaints in Los Angeles County were filed with HUD. Around 1 percent (9 cases) were filed by Redondo Beach residents. In the County and the City of Redondo Beach, disability-related discrimination was the most commonly reported, six comprising of Redondo Beach complaints. The specific reports used in the Regional AI are not available.

<b>Total Residents</b>	<b>283</b>
Hispanic	24
Non-Hispanic	259
Source: The Housing Rights Center, FY 2018-2021.	

Reports for Redondo Beach were obtained from the Housing Rights Center:

- FY 2018:
  - Discrimination inquiries - 10 on physical disabilities, 1 on familial status, 1 on gender, and 2 on mental disabilities
  - Disposition<sup>5</sup> – 9 cases were counseled, 3 were pending, 1 was referred to HUD FHEO or State DFEH, and 1 case was opened
- FY 2019:
  - Discrimination inquiries - 5 on physical disabilities and 2 on mental disabilities
  - Disposition – 6 cases were counseled and 1 was pending
- FY 2020:
  - Discrimination inquiries – 10 on physical disabilities, 3 on mental disabilities, 2 on general information, and 1 on source of income
  - Disposition – 13 cases were counseled, 1 was pending, 1 was referred to HUD FHEO or State DFEH, and 1 case was opened

As shown, disabilities are the leading bases for discrimination. This is fairly consistent with regional trends.

The City of Redondo Beach advertises fair housing services through placement of fair housing service brochures at public counters and provides a link to the HRC and all of the available brochures on the City’s website. Based on staff input outreach information could be better distributed or provided in more forms of media to reach more of the City’s growing and aging population. To address this, the City has co-hosted Housing Rights Workshops, and will continue to partner with HRC on such programs.

<sup>5</sup> Housing Rights Center reports do not provide a tracking of the disposition on a case-by-case basis, only a status update in the year end report. Cases opened in one year and resolved in another year are not included in its reports to the cities. Also pending cases are not reported with updated status.

Furthermore, City staff would also benefit from fair housing training from HRC. An action is included in the Housing Element to require housing staff attend a fair housing education workshop at least every other year.

### **Homelessness Programs**

In 2012, the Redondo Beach Police Department conducted a comprehensive survey of its homeless population. The goal of the survey was to improve public safety and increase the City's knowledge of this diverse population. The survey spotlighted an even greater population of persons experiencing homelessness, with more complex needs than what was previously believed.

In 2014, the City Manager formed a Homeless Task Force comprised of residents of Redondo Beach. The mission of the task force was to find collaborative ways to respond to the challenges faced by those experiencing homelessness, as well as residents, neighborhoods, businesses, schools, nonprofits, churches, and safety agencies. Under the direction of the City Manager, the Task Force made several recommendations, a key component of which was the need to contract with a coordinated outreach provider to ensure that all available services were accessible to those experiencing or at risk of homelessness.

PATH (People Assisting the Homeless) was identified as a sole source provider with an extensive industry network, trained staff, and a methodology for working with public agencies to address homelessness issues. PATH had previously been selected by the South Bay Cities Council of Governments (SBCCOG) to work with all SBCCOG member cities on homelessness. PATH brings over 30 years of experience to end homelessness for individuals, families, and communities.

The City's homeless population has steadily increased each year, with a corresponding increase in calls for Police and Fire Department services. The increase is partially related to the recent spate of prison release policies at the State level. Public Safety expense analyses for homeless related service calls have estimated annual costs of \$230,000 for Police and \$100,000 for Fire.

Although the demands on Public Safety have increased, the advantage of the partnership with PATH is that the interactions with persons experiencing homelessness can be tailored to their specific needs and that a case file can be started to align a customer with all available services and potential benefits, with the goal of placing the individual into transitional and/or permanent housing. PATH continues to expand on cooperative outreach with local faith-based organizations, such as Harbor Interfaith Services.

Yet, with the continued growth in the homeless population, and logistical complexities with PATH and the faith-based organizations connecting persons experiencing homelessness with the programs they need due to the transient nature of daily activities, in 2019 the Redondo Beach City Council determined that additional resources and strategies needed to be implemented.

An Enhanced Response Pilot Program was initiated by the City in June 2019 as an response to the impact of homelessness not only on individuals experiencing homelessness but also on

residents and the local community. The City sought a variety of creative and novel efforts ranging from innovative policing, amending the municipal code, and utilizing the criminal justice system as tools to minimize impacts on the community while striving towards the goal of housing homeless defendants. With the COVID-19 emergencies since 2020, there has been additional need to provide safe care and housing for those experiencing homelessness.

To further the effectiveness of the Redondo Beach Enhanced Response to Homelessness Pilot Program, in 2020 City Council authorized numerous creative initiatives, such as the following:

- Homeless Court. Homeless Court assists people experiencing homelessness who suffer from mental illnesses, struggle with substance abuse and addiction, and commit crimes of opportunity. The housing navigators and services brought to Homeless Court assist such individuals to curtail the criminal cycle of drug, alcohol, quality of life, and theft offenses by meeting misdemeanor defendants in Los Angeles County on designated “Homeless Court” dates to offer accessible community services and legal services. These services aim to get defendants housing ready and eventually permanently housed in order to graduate from Homeless Court and get their criminal charges dismissed. CDBG funds cover personnel and non-personnel costs.
- Mental Health Treatment Program. A significant percentage of the Homeless individuals who end up in criminal court have underlying chronic mental health conditions. Mental health treatment is vital and often necessary to get a homeless individual “Housing Ready.” The available treatment facilities are frequently overwhelmed with patients or they are otherwise difficult for homeless defendants to access. Since the inception of Enhanced Response to Homelessness Pilot Program it has been understood that access to Mental Health Services would be an important part of the program. Fortunately, the City has located a willing partner to address this unmet need. Clear Recovery Center is a South Bay based mental health treatment and substance abuse treatment provider that provides a full continuum of care. Their treatment is individualized, evidence-based and age-specific in order to give their clients the best possible chance at long term recovery. They pride themselves on their expert clinical team who is highly skilled in the latest in evidence-based treatments and therapies. Clear Recovery Center has offered to donate \$5,000 per month of professional clinical services for a mental health treatment program to assist the homeless. Additionally, the City has continued seek additional funding to purchase additional hours of counseling depending on the demand for these services.
- Transitional Housing. Transitional or bridge housing brings stabilization to people experiencing homelessness and helps them acclimate to a more structured lifestyle that will allow them to take the necessary steps towards permanent housing. Redondo Beach instituted bridge housing, in the design of Pallet Shelter housing, in December of 2020. These Pallet Shelters are individual temporary homeless structures (15 structures total), located at 1521 Kingsdale Avenue in Redondo Beach on the lot where the City’s Transit Center is being constructed in the northern part of the City. The Pallet Shelters were initially jointly funded for 6 months by the City of Redondo Beach and the County using Community Development Block Grant funds. In June

2021, the City Council approved an amendment to the funding agreement with the County to continue to provide the shelters.

- Permanent Supportive Housing. The State of California established a program for funding for various housing projects through the Project Homekey program. Century Housing Corporation, a nonprofit housing development organization, is partnering with Los Angeles County as a co-applicant for funding to acquire and renovate a hotel site in south Redondo Beach for permanent supportive housing. On November 9, 2021, the Redondo Beach City Council voted unanimously to support the Homekey Round 2 application from the joint applicants of Century Housing Corporation and Los Angeles County to provide housing for those who are experiencing homelessness or at risk of becoming homeless. The application was submitted and supplemental information is being considered in early 2022. Once funding is obtained, the acquisition and remodeling can begin in 2022 to develop 20 units of affordable housing in the form of permanent supportive housing.

On April 13, 2021, the Mayor and City Council voted to make the Enhanced Response to Homelessness Pilot Program permanent and to remain under the City Attorney's Department for the next four years.

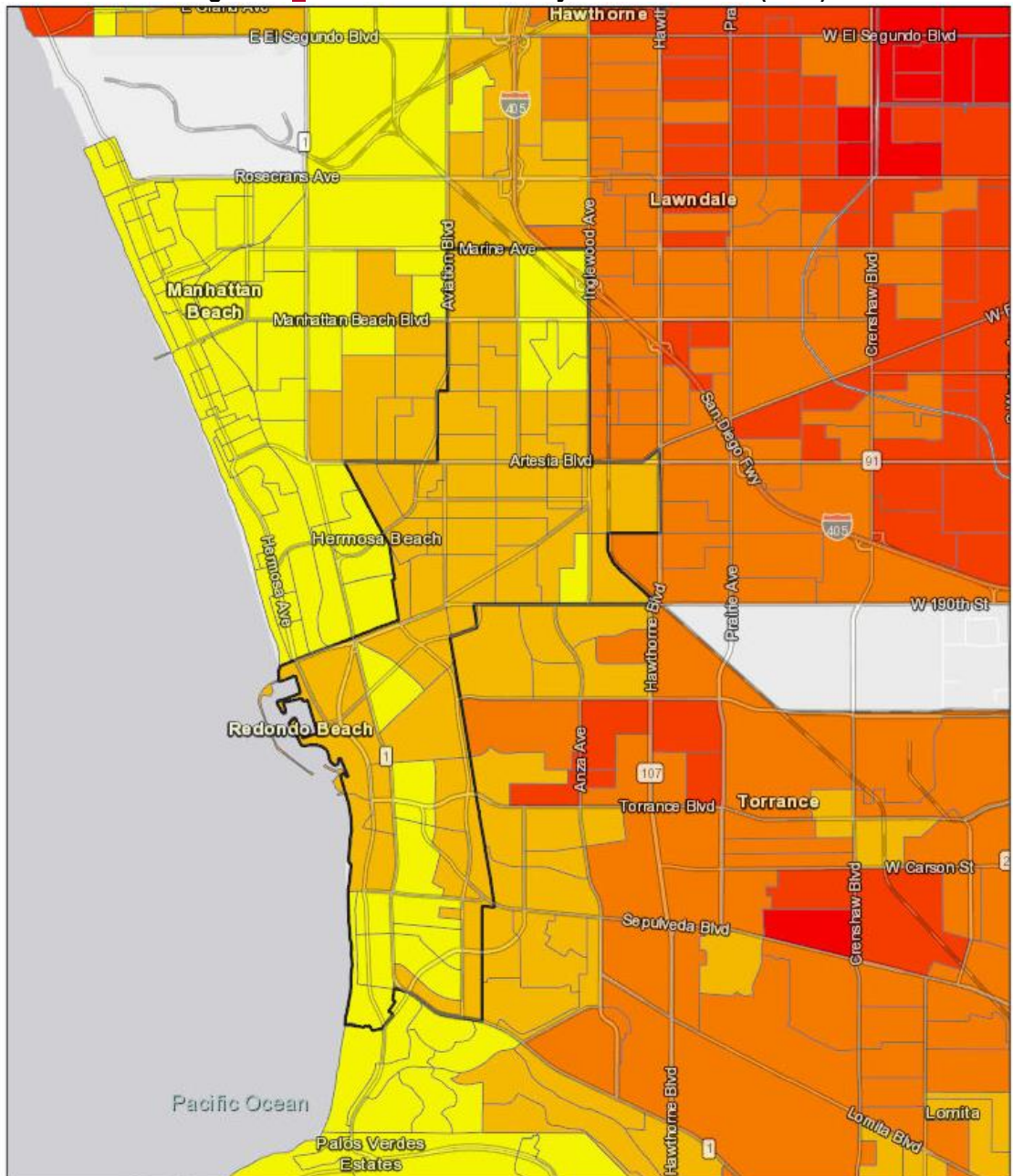
## **B. Integration and Segregation**

### **1. Race and Ethnicity**

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. According to the 2015-2019 ACS, approximately 60 percent of Redondo Beach's population were non-Hispanic Whites, compared to 65 percent in 2010. The City's population is becoming slightly more racially/ethnically diverse with the proportion of Asian (up 4 percent) and Black (up 2 percent) residents increasing. HUD defines Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) as census tracts with a non-White population over 50 percent and with 40 percent or three times the overall poverty rate. Currently, there are no R/ECAPs located in the City. [Figure D-1](#) shows racial/ethnic concentrated block groups from in 2010 and [Figure D-2](#) shows them in 2018. Consistent with the increase Citywide, most block groups in Redondo Beach have seen an increase in racial/ethnic minority populations since 2010. Areas directly surrounding the City have grown substantially in racial/ethnic minorities. The City of Lawndale has seen some of the highest growths of minorities populations in the surrounding region since 2010.

Redondo Beach's proximity to the coast/beach and more recent/new developments with much higher land values result in different conditions than in Lawndale and Torrance. Additionally, with respect to zoning, the up zoning from R-1 of the north Redondo neighborhoods to R-2 and R-3 has resulted in turnover/redevelopment of properties in recent past and therefore contributes to higher land values. These higher land values and the attached higher cost of living has resulted in lower proportions of low and moderate income minority households than surrounding cities.

**Figure D-1: Racial/Ethnic Minority Concentrations (2010)**

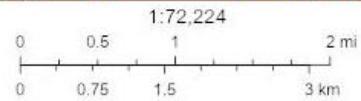


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City/Town Boundaries

(A) Racial Demographics (2010) - Block Group

- ≤20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 81%

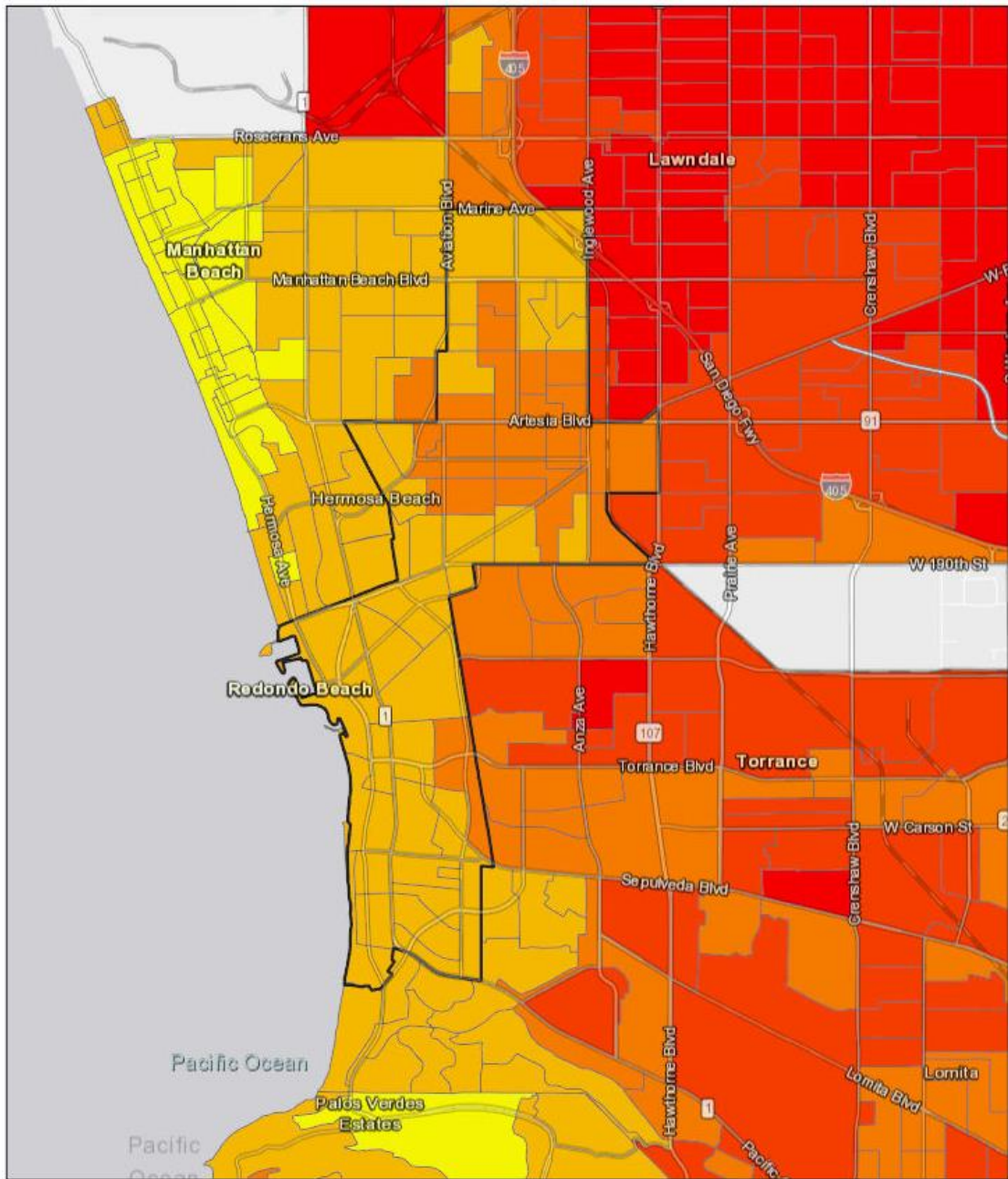


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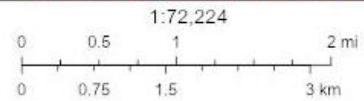


Figure D-2: Racial/Ethnic Minority Concentrations (2018)



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- City/Town Boundaries
- (R) Racial Demographics (2018) - Block Group
- ≤ 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 81%



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HUD tracks racial or ethnic dissimilarity<sup>6</sup> trends for jurisdictions and regions. Dissimilarity indices show the extent of distribution between two groups, in this case racial/ethnic groups, across census tracts. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

The indices for Redondo Beach and the Los Angeles County region from 1990 to 2020 are shown in [Table D-2](#). Dissimilarity between non-White and White communities in Redondo Beach and throughout the Los Angeles County region has worsened since 1990. In Redondo Beach, dissimilarity between Black/White, Hispanic/White and Asian or Pacific Islander/White communities has worsened. In the County the dissimilarity between Black/White communities has improved. Based on HUD’s index, segregation in Redondo Beach is very low compared to Los Angeles County as a whole.

<b>Table D-2: Racial/Ethnic Dissimilarity Trends</b>				
	<b>1990 Trend</b>	<b>2000 Trend</b>	<b>2010 Trend</b>	<b>Current</b>
<b>Redondo Beach, CA</b>				
Non-White/White	10.40	12.93	10.62	13.58
Black/White	14.67	13.62	14.56	22.48
Hispanic/White	11.05	15.44	13.24	15.74
Asian or Pacific Islander/White	11.22	10.98	9.09	13.05
<b>Los Angeles-Long Beach-Anaheim, CA Region (County)</b>				
Non-White/White	55.32	55.50	54.64	56.94
Black/White	72.75	68.12	65.22	68.85
Hispanic/White	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	43.46	46.02	45.77	49.78
Source: Decennial Census, 1990-2010. HUD AFFH Data, 2020.				

Most of the City’s block groups have a minority population between 21 and 40 percent ([Figure D-2](#)). The City identified about 51.1 percent of its RHNA units in block groups with a 21-40 percent minority concentration. Table D-3 shows that almost an equal proportion of the overall RHNA units are distributed in block groups with a slightly higher minority concentration (41-60 percent). These block groups account for 45.4 percent of the RHNA. While a higher proportion of lower income RHNA units are located in areas with higher minority concentration, these sites are located along the City’s commercial corridors, with access to transit and services. Furthermore, the City also offers ample opportunities for recycling lower density uses into higher intensity uses in moderate density R2 and R3 neighborhoods. The distribution of the sites for the inventory does not exacerbate segregation conditions and provides sites for all income levels in block groups with varying levels of minority concentrations. This distribution can be seen in relation to minority concentration by block group in

<sup>6</sup> Index of dissimilarity is a demographic measure of the evenness with which two groups are distributed across a geographic area. It is the most commonly used and accepted method of measuring segregation.

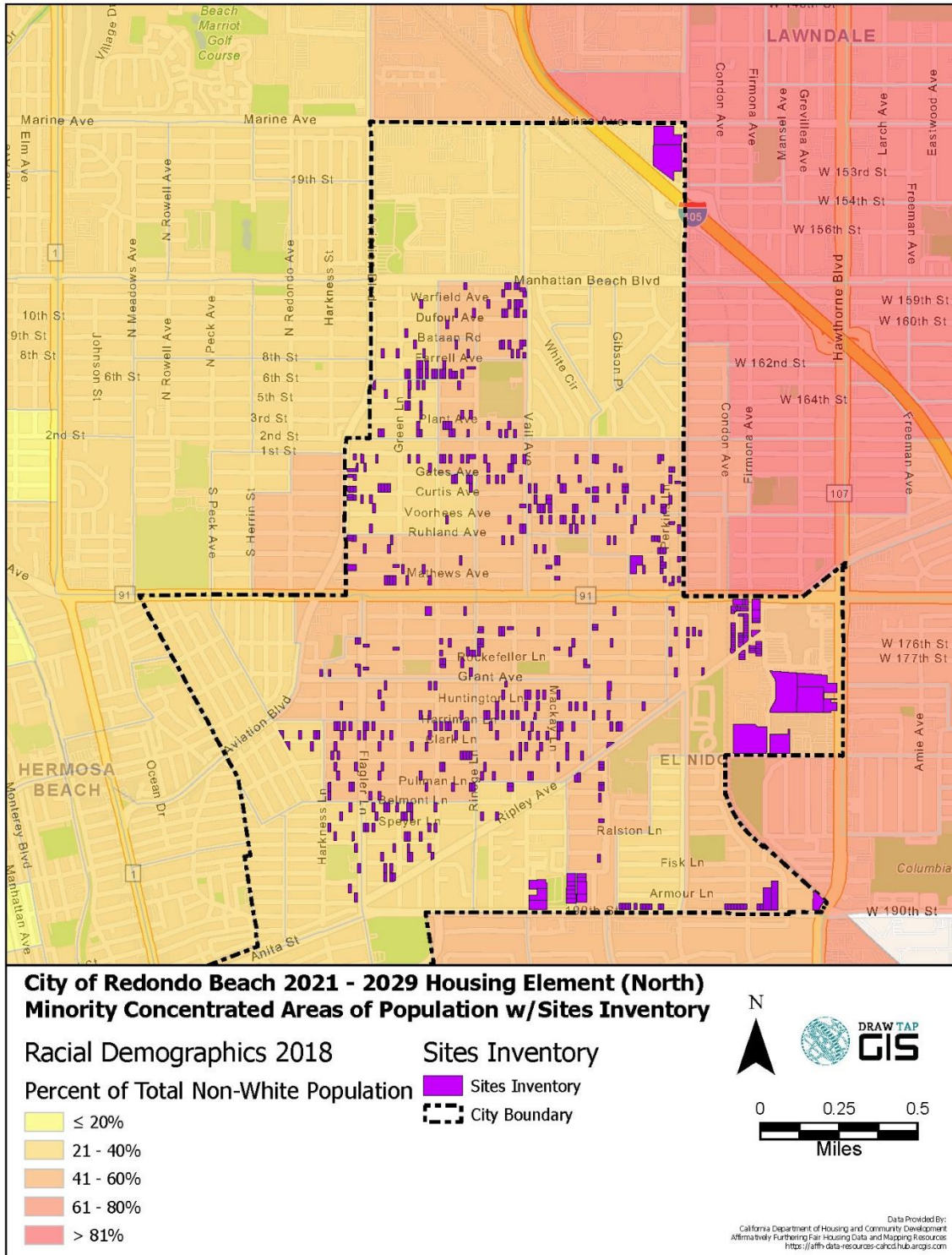


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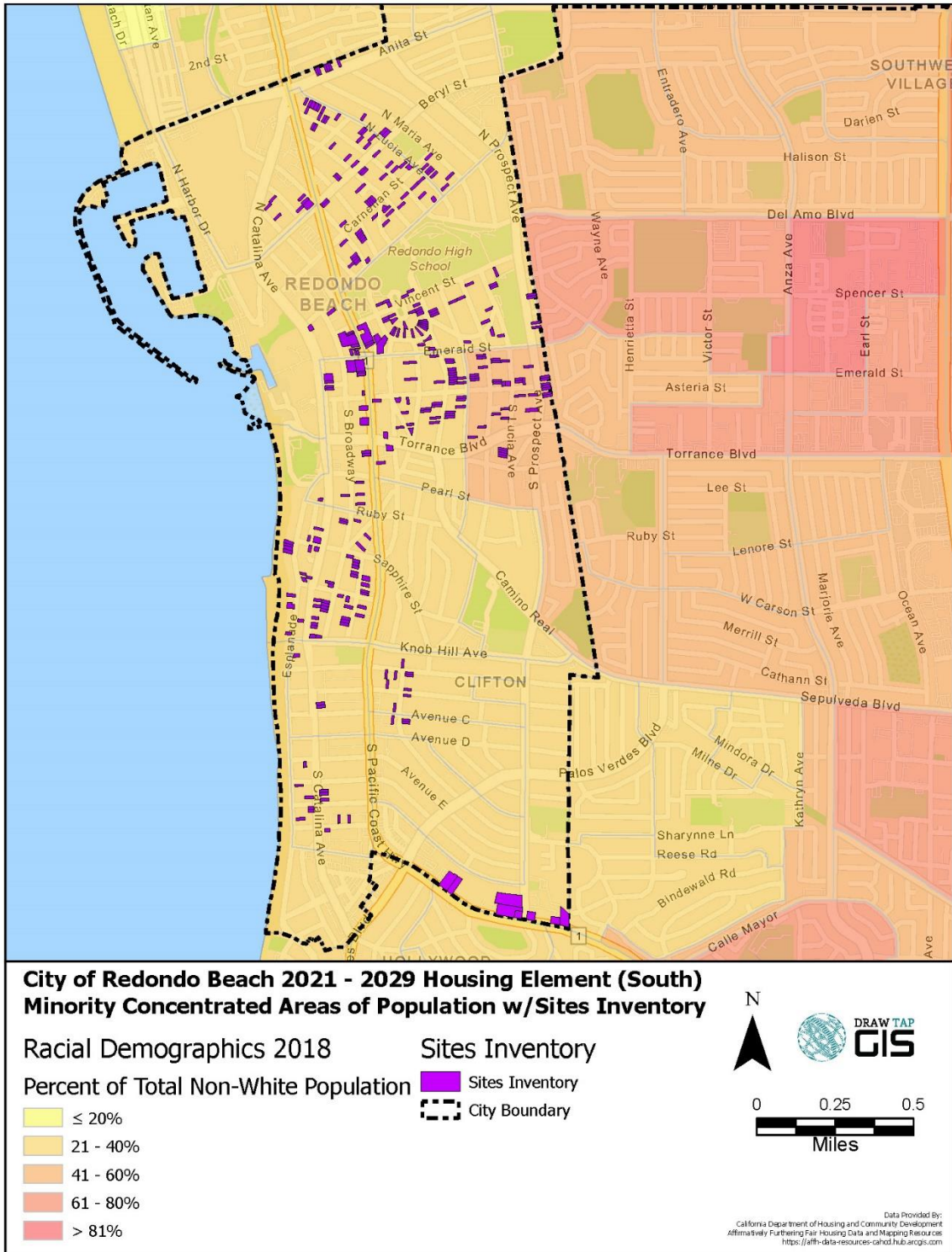
Figure D-3.

Table D-3: RHNA Unit Distribution by % Minority Concentration				
% Minority Concentration	Lower	Moderate	AM	Total Units
<= 20%	0.0%	0.0%	0.0%	0.0%
21 - 40%	<u>34.0%</u>	<u>58.9%</u>	<u>54.7%</u>	<u>45.4%</u>
41 - 60%	<u>66.0%</u>	<u>41.1%</u>	<u>45.3%</u>	<u>54.6%</u>
61 - 80%	0.0%	0.0%	0.0%	0.0%
> 81%	0.0%	0.0%	0.0%	0.0%
Total	<u>1,409</u>	<u>683</u>	<u>749</u>	<u>2,841</u>

Figure D-3: RHNA Unit Distribution by % of Minority Concentration – North of 190th



**Figure D-4: RHNA Unit Distribution by % of Minority Concentration – South of 190th**



## 2. Persons with Disabilities

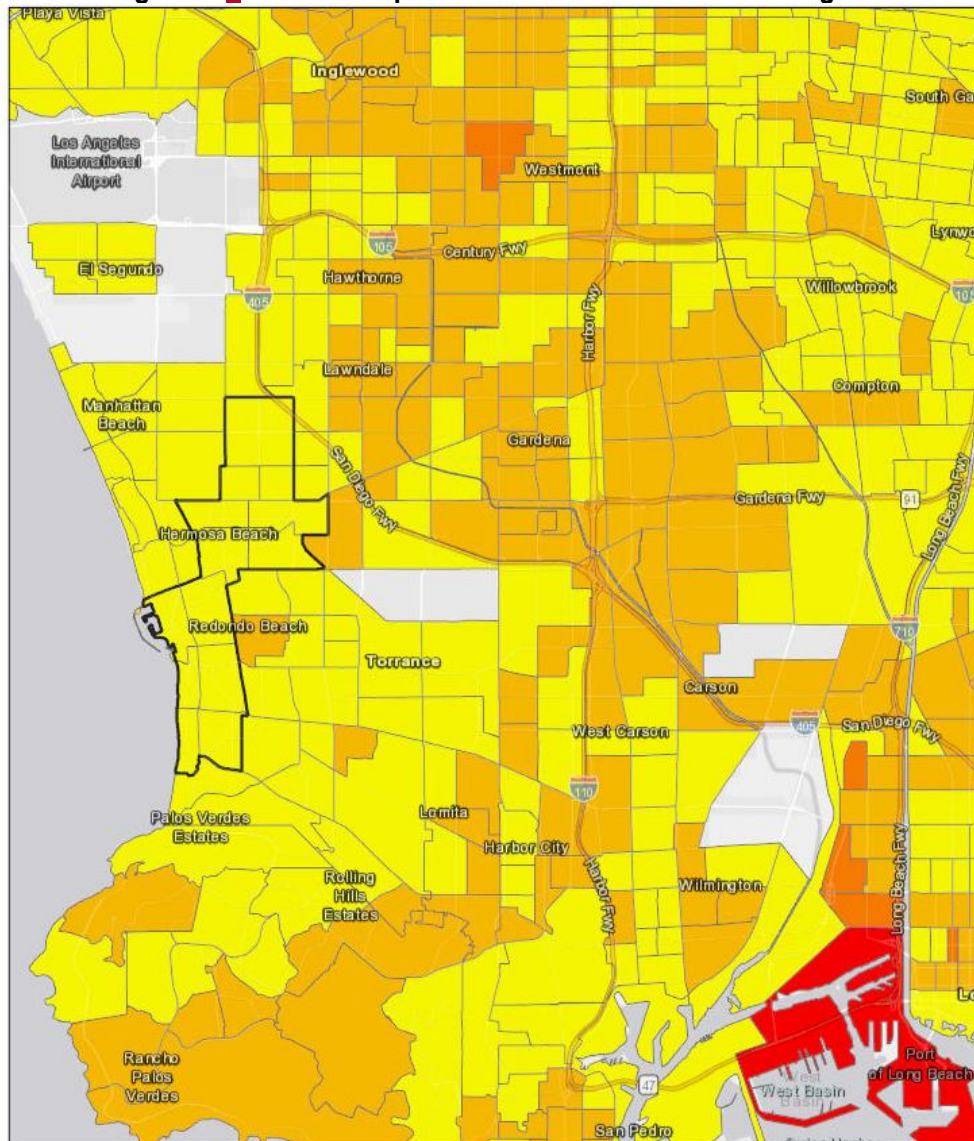
According to 2015-2019 ACS data, disabled persons make up approximately 6.5 percent of the population in Redondo Beach. Between 2015 and 2019, 45 percent of the City's population with disabilities was made up of residents aged 65 and older, while 51 percent were aged 18 to 64. Of the residents 65 years and older, ambulatory, hearing and independent living difficulties were prevalent. In Los Angeles County, about 15 percent of the population has a disability. The 2021 County Health Rankings in [Figure D-5](#) show that in the region surrounding the City, concentrations of persons with disabilities range between 10 and 20 percent per tract to 20 and 30 percent. In the community of Westmont and in Long Beach, there are a few tracts with higher percentages of persons with disabilities. Within Redondo Beach, there is no concentration of persons with disabilities as all tracts within the City have a population with a disability ranging from 10 to 20 percent ([Figure D-6](#)).

Redondo Beach's RHNA units are not disproportionately concentrated in areas that have more persons with disabilities as all tracts in the City have 10 to 20 percent of the population being persons with a disability.

The housing needs of disabled persons in Redondo Beach are of particular importance because as a built-out community, about 66 percent of the City's housing units were more than 40 years old and another 25 percent reaching at least 30 years old during this Housing Element planning period. Therefore, the majority of the City's housing stock does not comply with the Americans with Disabilities Act for accessibility. Housing options for persons with disabilities in the community are limited.



**Figure D-5: Percent Population with Disabilities in the Region**



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City/Town Boundaries

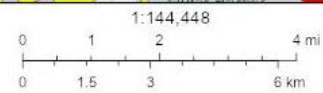
(R) Population with a Disability (ACS, 2016 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

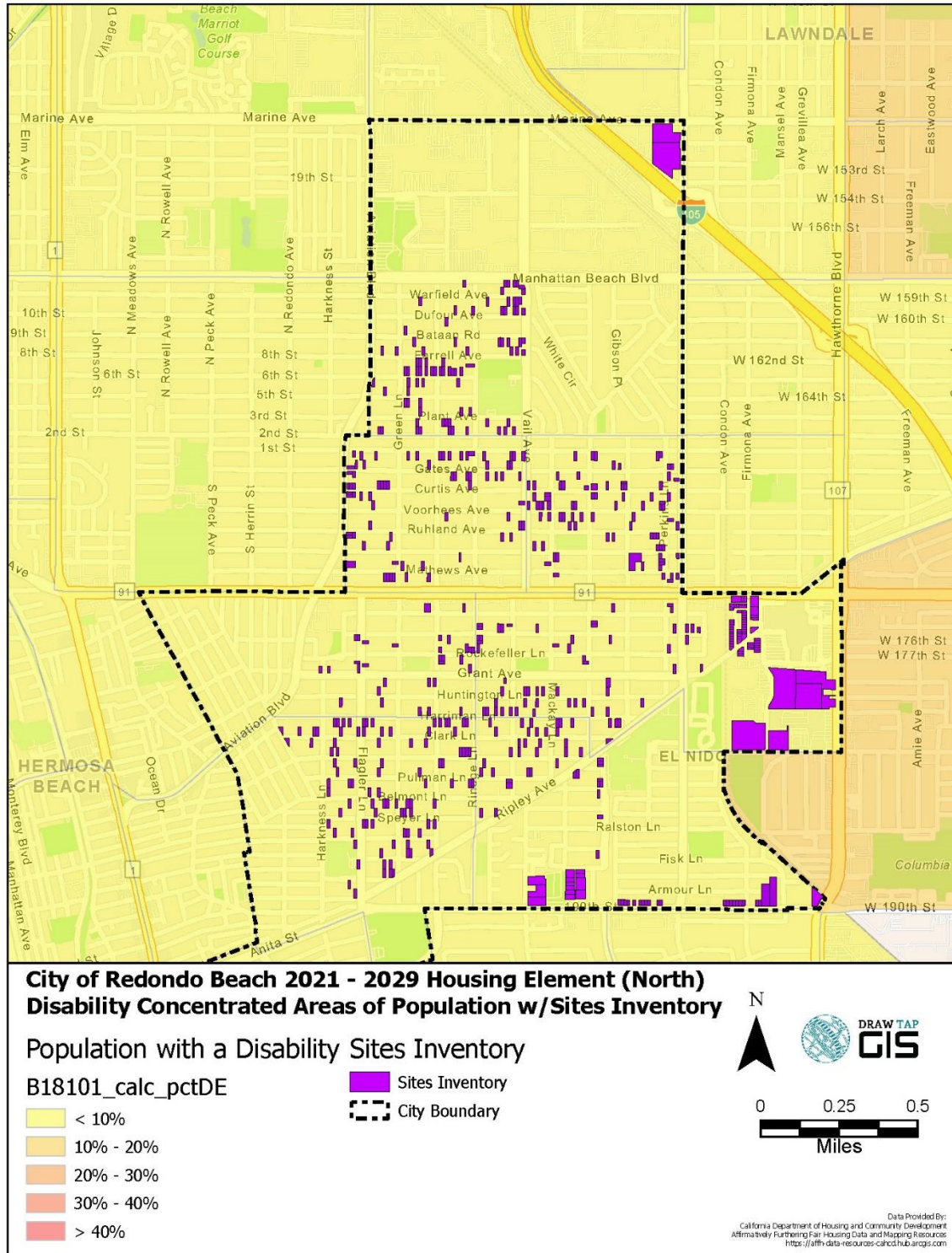
> 40%



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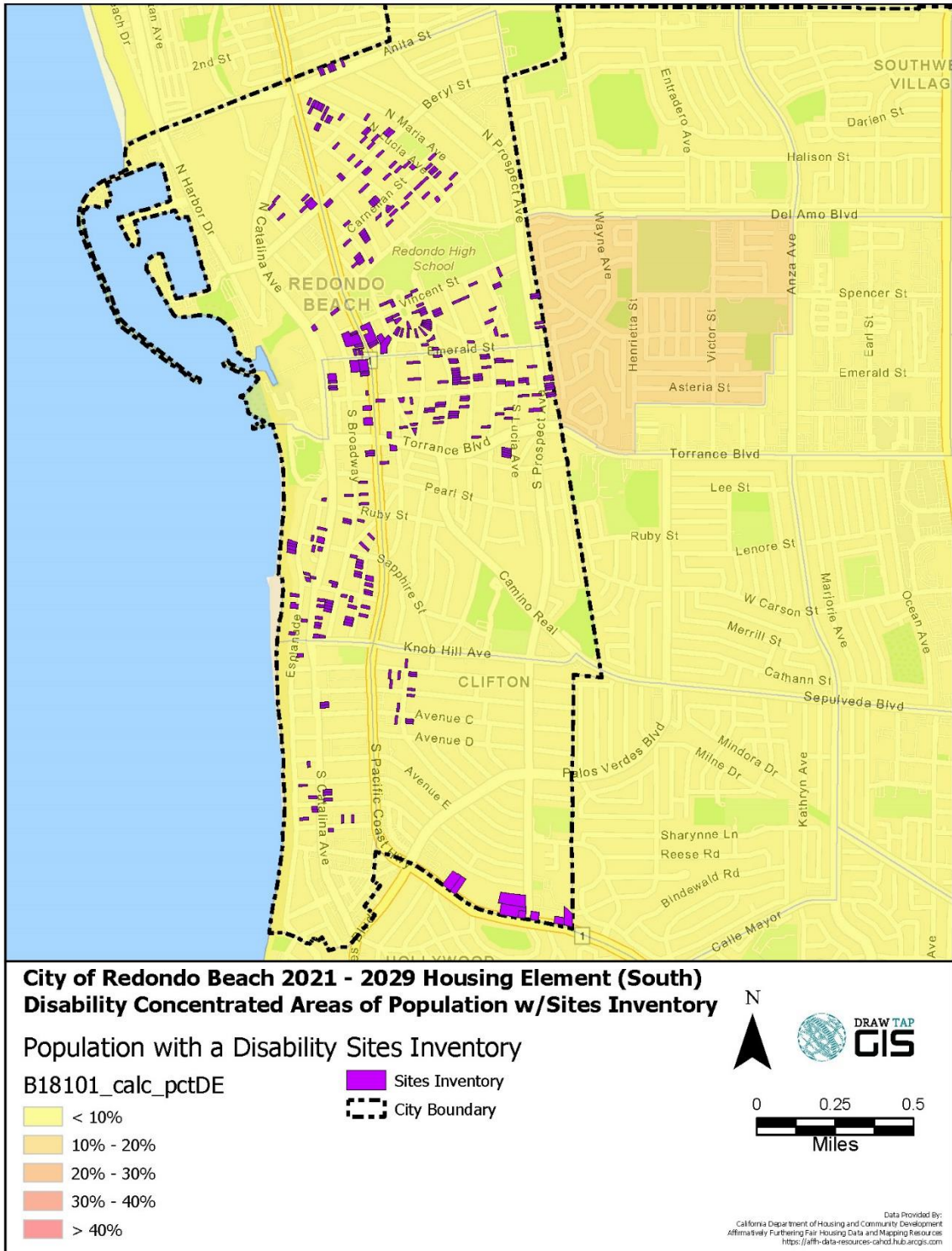
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**Figure D-6: Percent Population with Disabilities in Redondo Beach and Distribution of RHNA – North of 190th**





**Figure D-7: Percent Population with Disabilities in Redondo Beach and Distribution of RHNA – South of 190th**



### 3. Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. According to the HCD AB686/AFFH data tool maps ([Figure D-8](#)), there are a few areas with a small concentration of households with adults living alone in the City. Adults living with their spouse are spread evenly throughout the City, where the population of adults living with their spouse is 20 to 40 percent in the majority of the City ([Figure D-9](#)).

Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law. As shown in [Table D-4](#), 29 percent of Redondo Beach households are families with children. The City’s share of families with children is slightly higher than the County overall. According to the HCD AFFH map in [Figure D-10](#), children in married households are very spread out through the City. The percent of households with children in most tracts is above 80 percent, probably due to the housing types available. The City’s RHNA units are equally spread among census tracts with 60 to 80 percent and more than 80 percent of the population being children in married-couple households ([Table D-5](#)). A higher proportion of lower income RHNA units are located in areas with families with children. New units can offer a range of housing choices including townhomes, condos, and apartments, with the opportunity to diversify the existing neighborhoods by introducing younger households.

Jurisdiction	% Families	% Families with Children	% Female-Headed Households with Children
Redondo Beach	60.9%	29.0%	7.6%
Los Angeles County	66.6%	28.2%	6.4%

Source: 2015-2019 ACS.

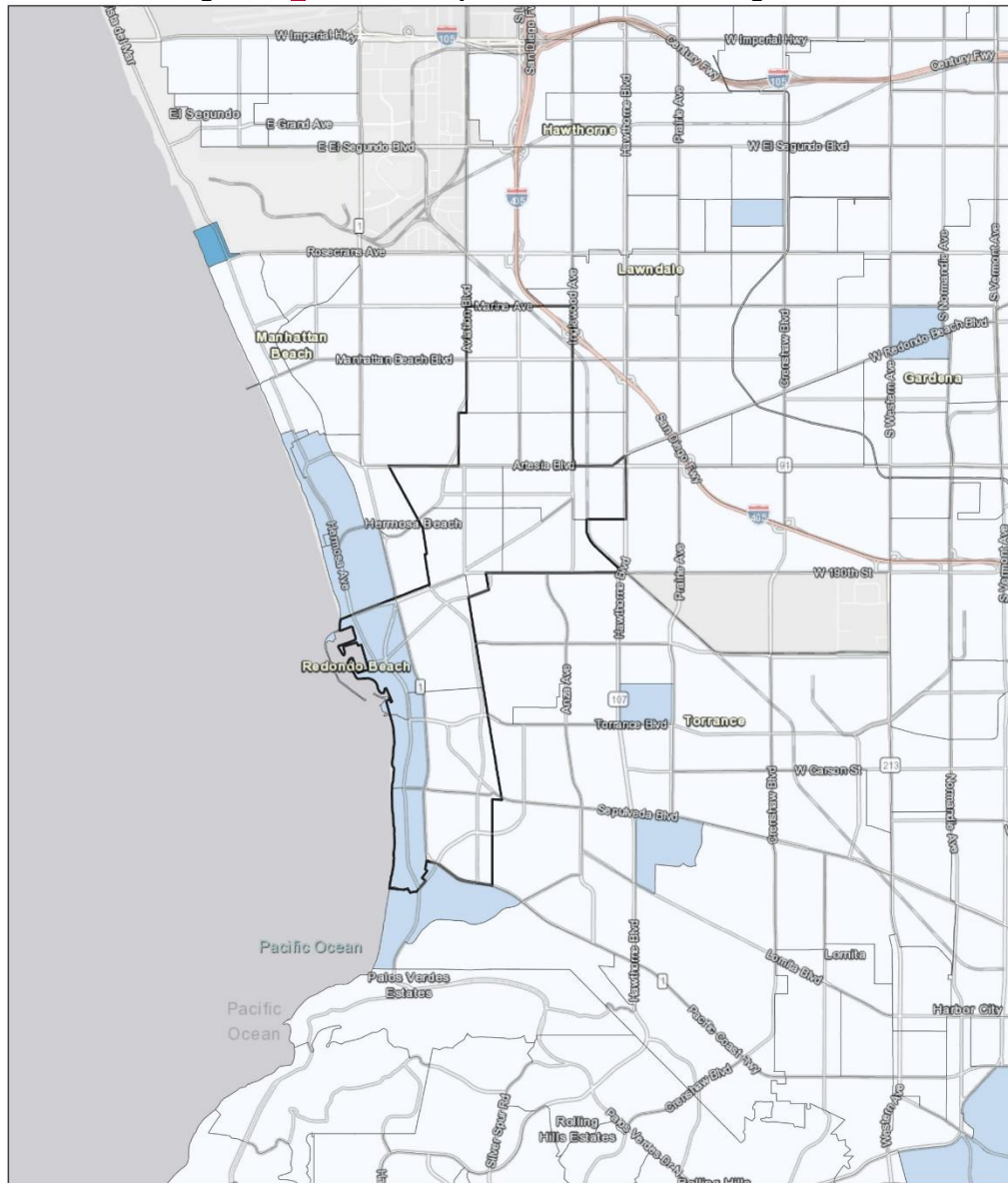
% Children in Married-Couple HH	Lower	Moderate	AM	Total Units
< 20%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
20% - 40%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
40% - 60%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
60% - 80%	<u>70.7%</u>	<u>32.1%</u>	<u>23.5%</u>	<u>49.0%</u>
> 80%	<u>29.3%</u>	<u>67.9%</u>	<u>76.5%</u>	<u>51.0%</u>
Total Units	<u>1,409</u>	<u>683</u>	<u>749</u>	<u>2841</u>

Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. In Redondo Beach, female headed households with children are not concentrated in any census tracts ([Figure D-12](#)). An estimated 12 percent of Redondo

Beach households were headed by single parents, with or without children, in 2019. The large majority of the single parent households were headed by females (64 percent). According to the 2015-2019 ACS, five percent of the female-headed households with children had incomes below the poverty level. The City’s RHNA sites are all located in the census tracts with less than 20 percent of children in female-headed households ([Table D-6](#)).

<b>Table D-6: RHNA Unit Distribution by % Children in Female-Headed Households</b>				
<b>% Children in Female-Headed HH</b>	<b>Lower</b>	<b>Moderate</b>	<b>AM</b>	<b>Total Units</b>
< 20%	100.0%	100.0%	100.0%	100.0%
20% - 40%	0.0%	0.0%	0.0%	0.0%
40% - 60%	0.0%	0.0%	0.0%	0.0%
60% - 80%	0.0%	0.0%	0.0%	0.0%
> 80%	0.0%	0.0%	0.0%	0.0%
<b>Total Units</b>	<b>1,409</b>	<b>683</b>	<b>749</b>	<b>2,841</b>

**Figure D-8: Percent Population of Adults Living Alone**

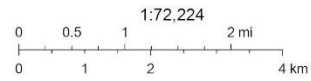


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City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

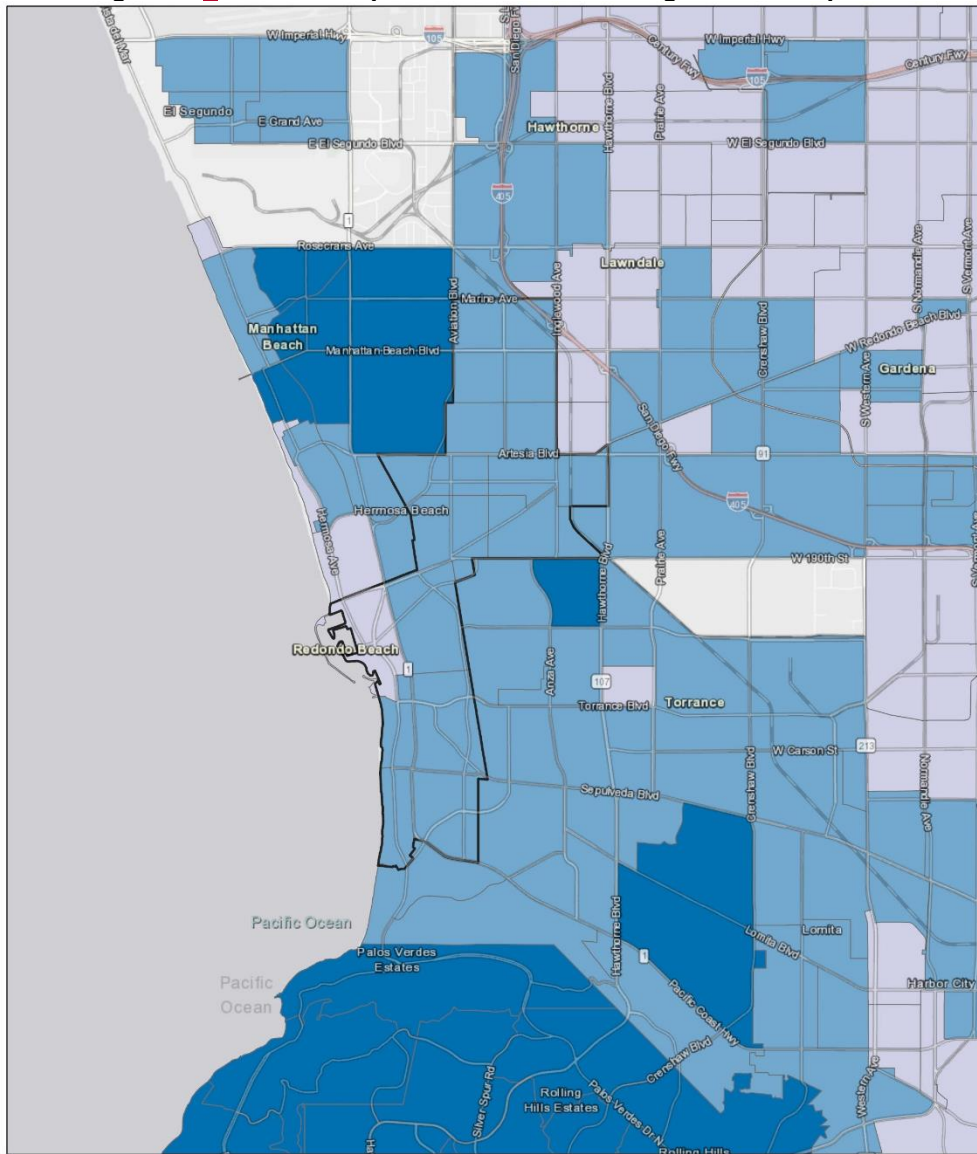
- < 20%
- 20% - 40%
- 40% - 60%



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CA HCD

**Figure D-9: Percent Population of Adults Living with their Spouse**



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City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

20% - 40%

40% - 60%

60% - 80%

1:72,224

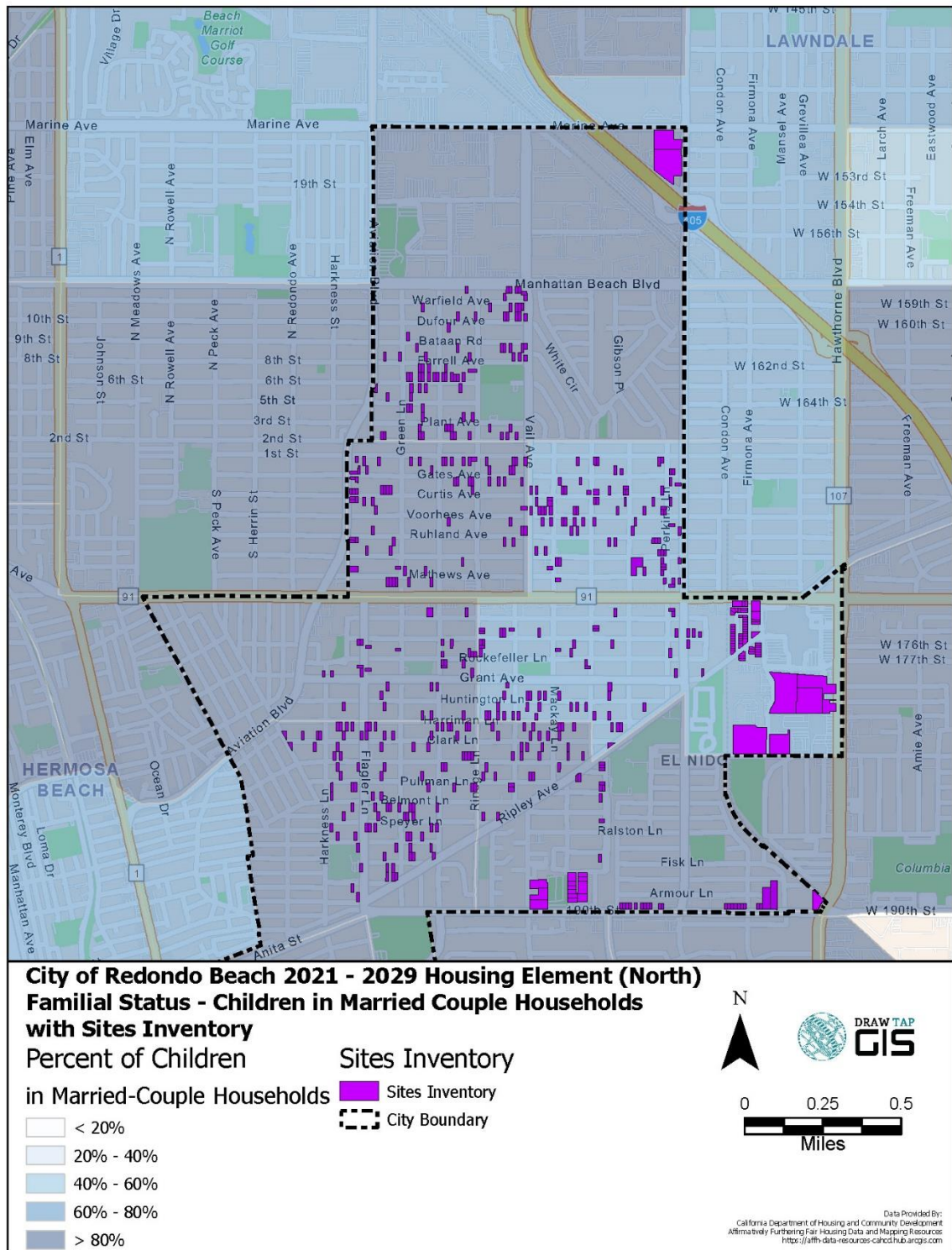


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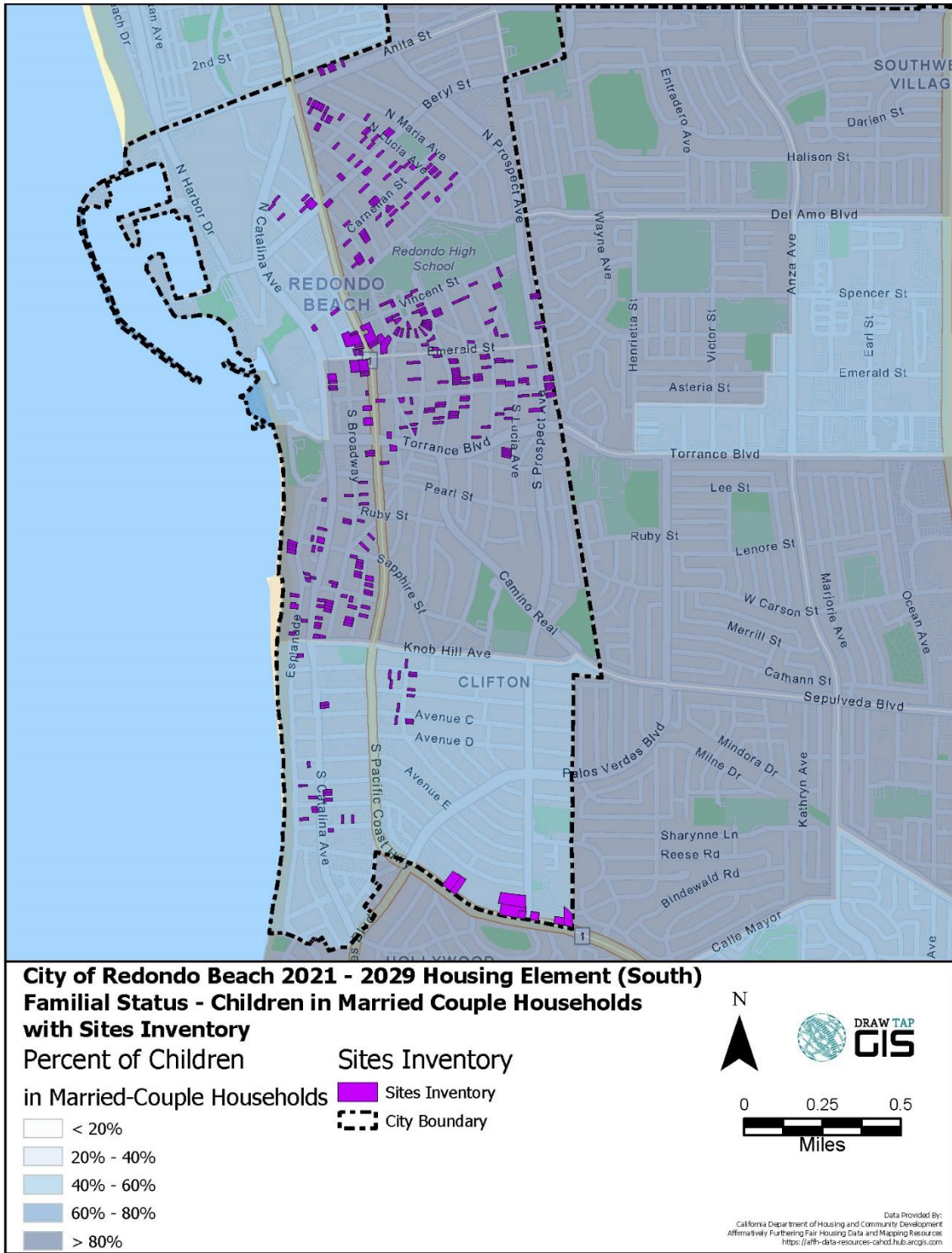


**Figure D-10: Percent of Children in Married Couple Households and RHNA Distribution – North of 190th**

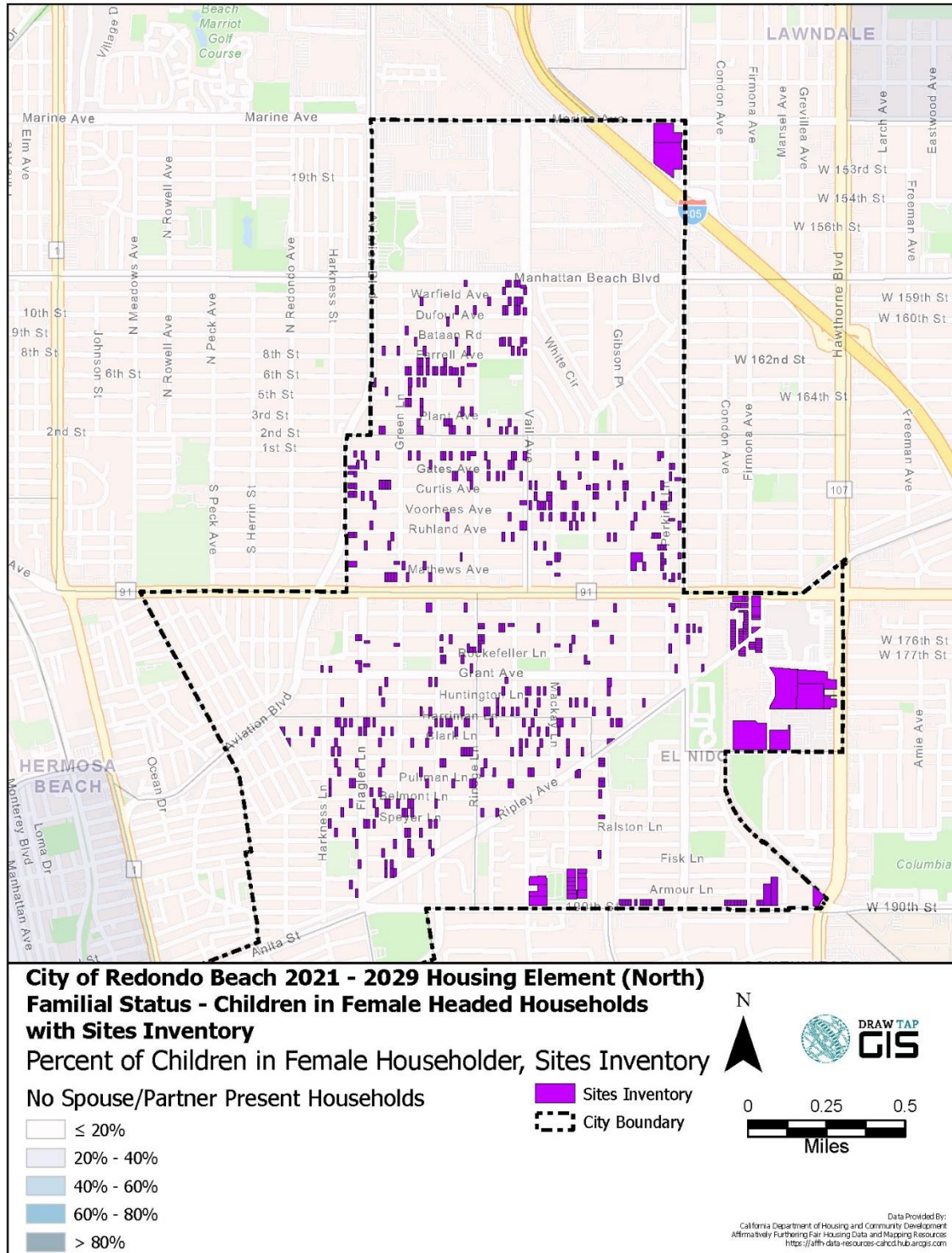




**Figure D-11: Percent of Children in Married Couple Households and RHNA Distribution – South of 190th**

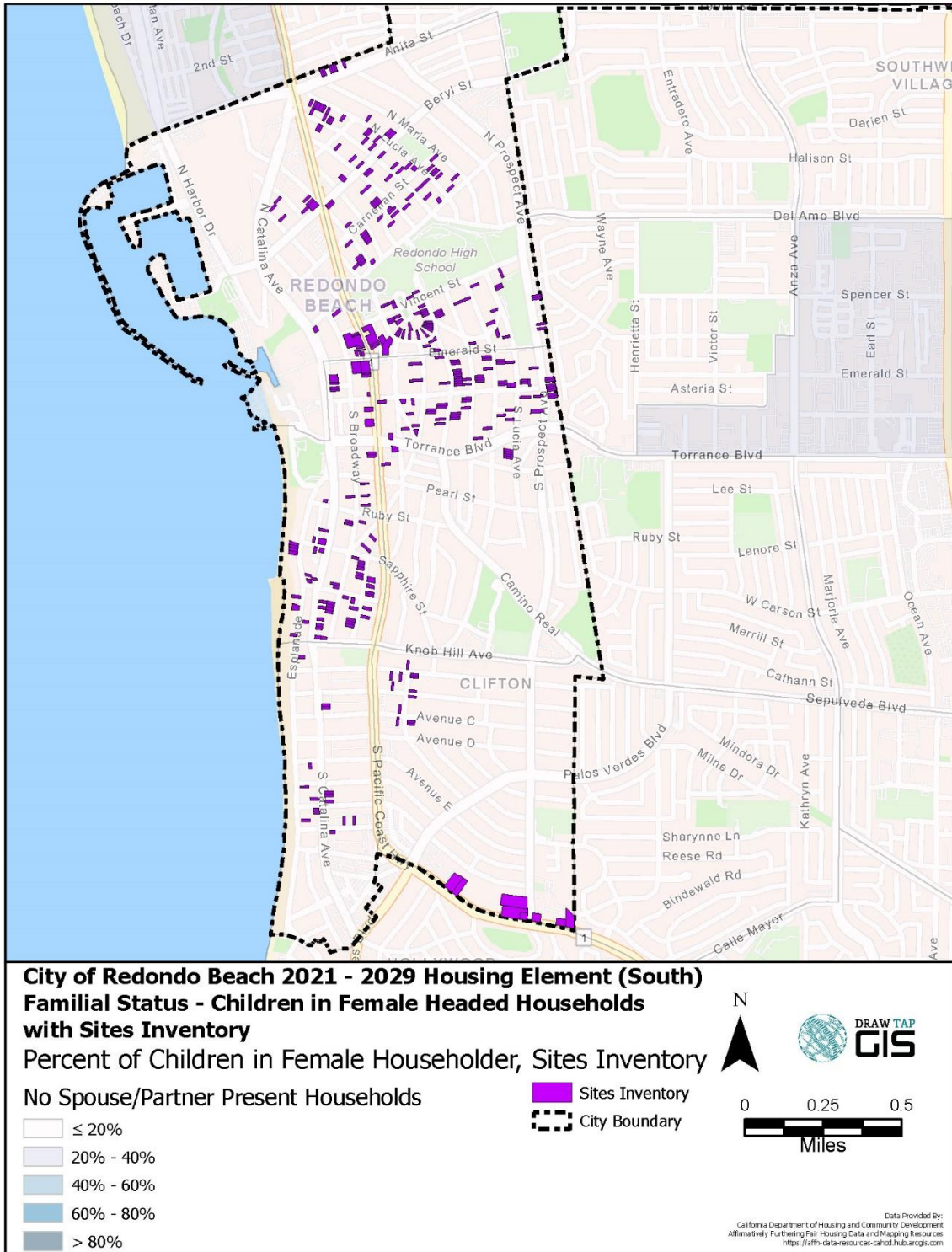


**Figure D-12: Percent of Children in Single Female-Headed Households and RHNA Distribution – North of 190th**





**Figure D-13: Percent of Children in Single Female-Headed Households and RHNA Distribution – South of 190th**



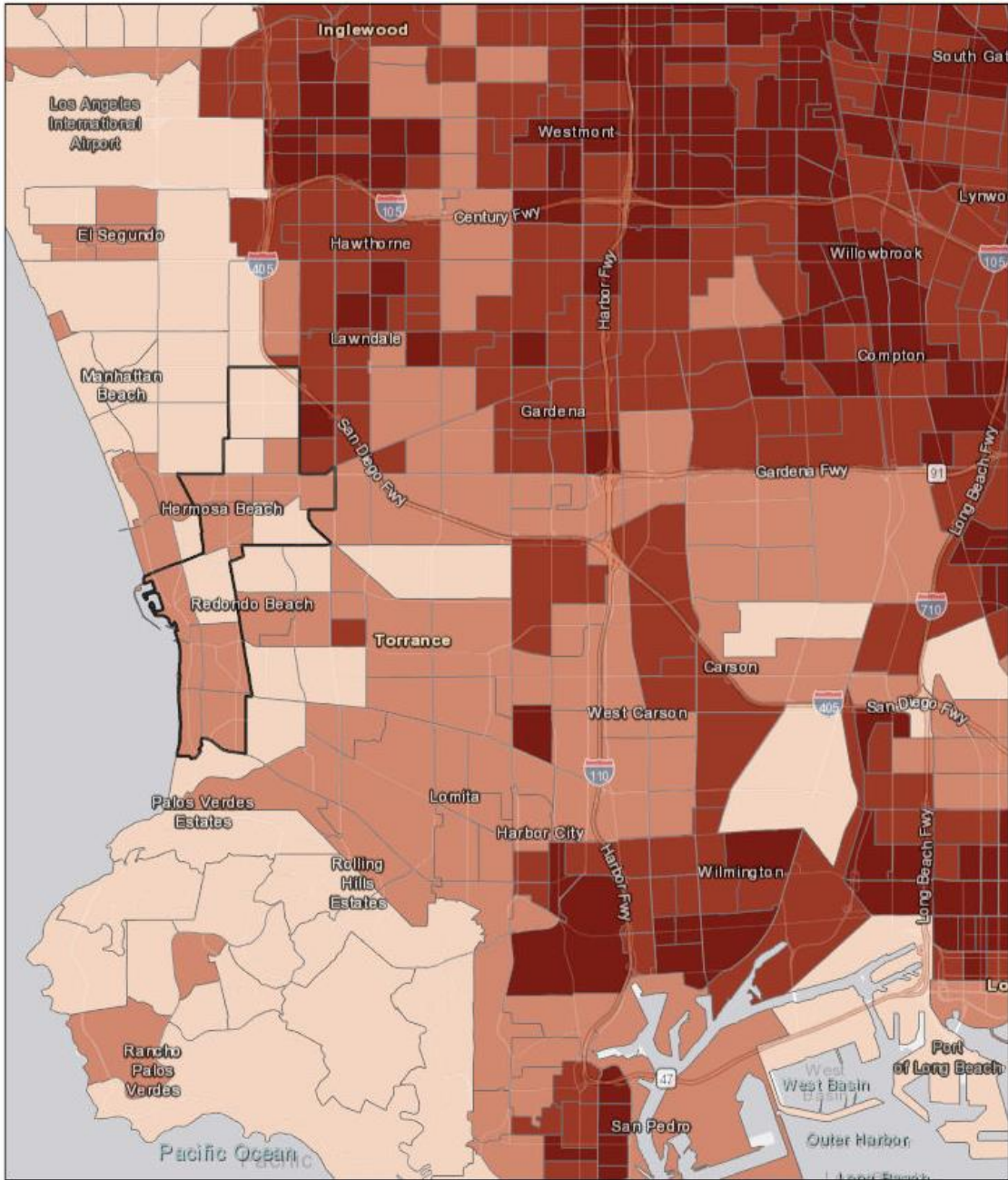
#### 4. Income Level

Household incomes in Redondo Beach tend to be substantially higher than many cities in the region as a whole. Median household income in the City was \$113,499 in 2019, compared to the Los Angeles County median household income of \$72,797.

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. [Figure D-14](#) shows the Lower and Moderate Income (LMI) areas in the surrounding region by Census block group. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). LMI areas are concentrated in areas outside of Redondo Beach as it goes inland towards Downtown Los Angeles and towards the City of Long Beach. There are some areas of Redondo Beach considered LMI with the highest concentration of LMI population being 50 to 75 percent in two block groups ([Figure D-15](#)). The City’s RHNA is spread out through block groups with different percentages of low to moderate income households but are mainly located in the block groups with a smaller percentage of LMI households ([Table D-7](#)). The majority of the RHNA sites are located in areas with lower percentage of lower income households. New housing is primarily being accommodated in along commercial corridors where there are access to public transportation, services, and employment. Furthermore, as shown in the Section 2.2.4 of the Housing Element, the recently approved affordable housing projects are located throughout the City, including in northern, central, and southern Redondo Beach.

% LMI HH	Lower	Moderate	AM	Total Units
< 25%	<u>78.6%</u>	<u>45.4%</u>	<u>78.1%</u>	<u>70.5%</u>
25% - 50%	<u>15.8%</u>	<u>51.5%</u>	<u>21.9%</u>	<u>26.0%</u>
50% - 75%	<u>5.6%</u>	<u>3.1%</u>	<u>0.0%</u>	<u>3.5%</u>
75% - 100%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
Total Units	<u>1,409</u>	<u>683</u>	<u>749</u>	<u>2,841</u>

Figure D-14: Low and Moderate Income (LMI) areas in the Region



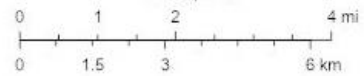
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City/Town Boundaries

(A) Low to Moderate Income Population (HUD) - Tract

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%



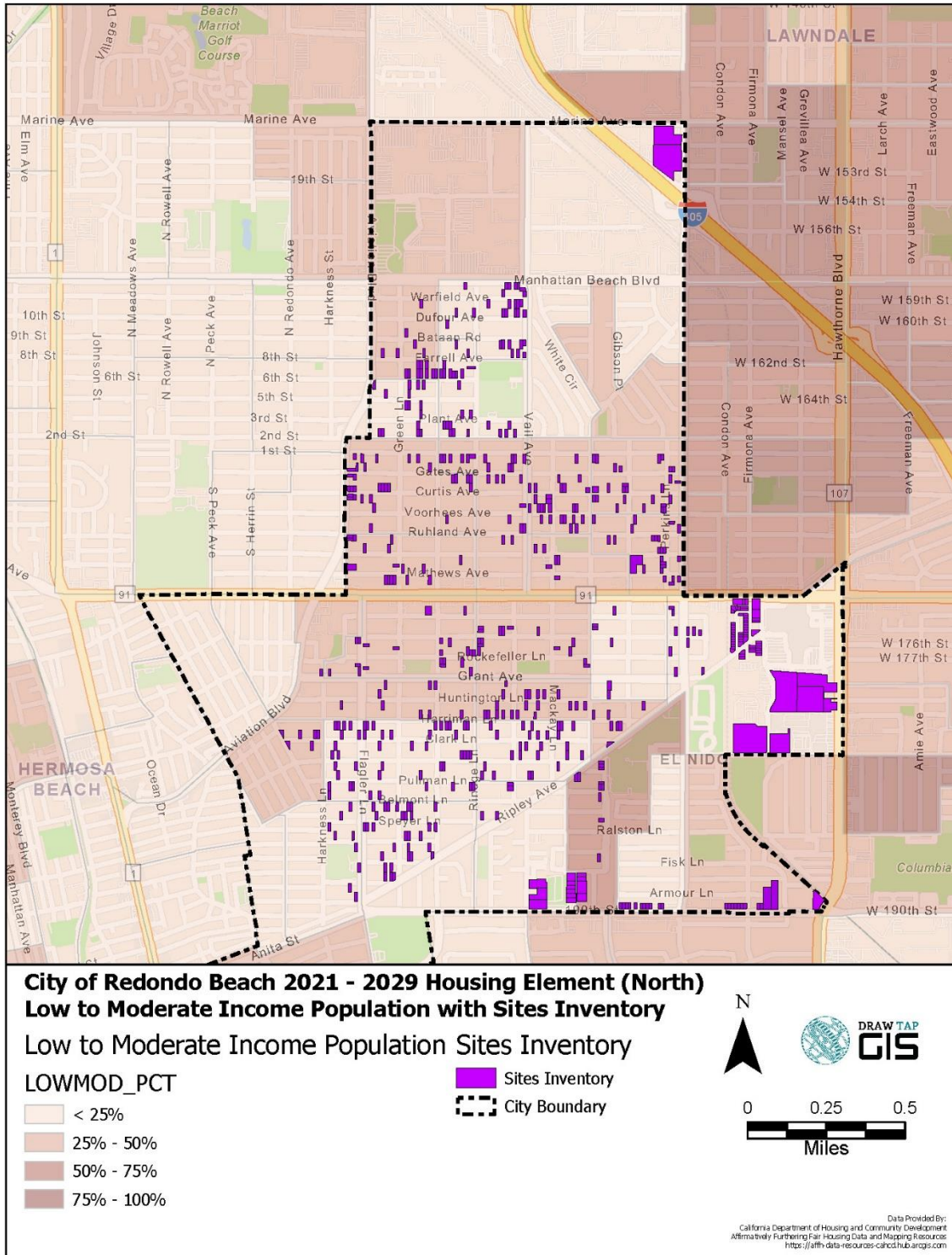
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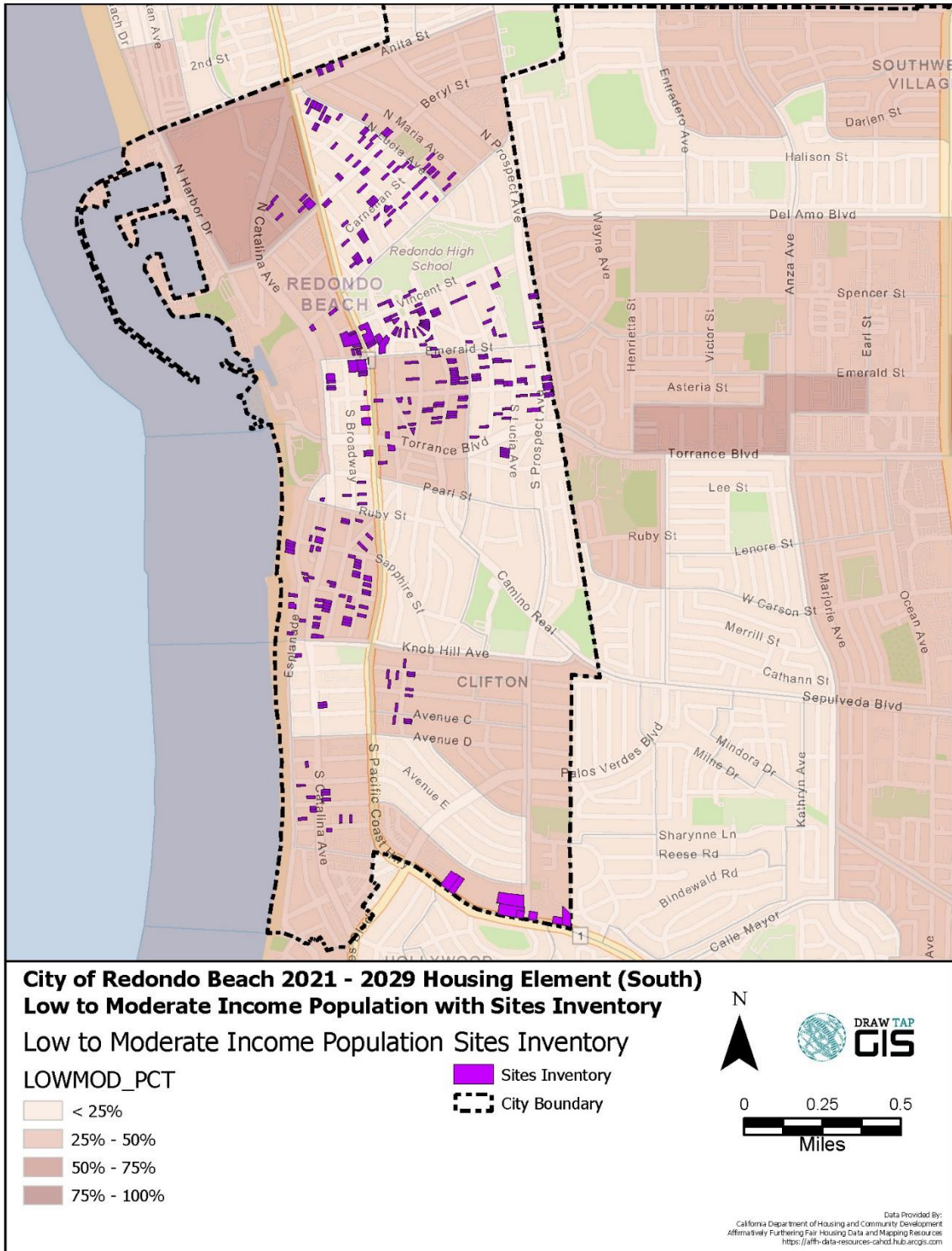


**Figure D-15: Low and Moderate Income (LMI) Areas in Redondo Beach and RHNA Distribution – North of 190th**





**Figure D-16: Low and Moderate Income (LMI) Areas in Redondo Beach and RHNA Distribution – South of 190th**

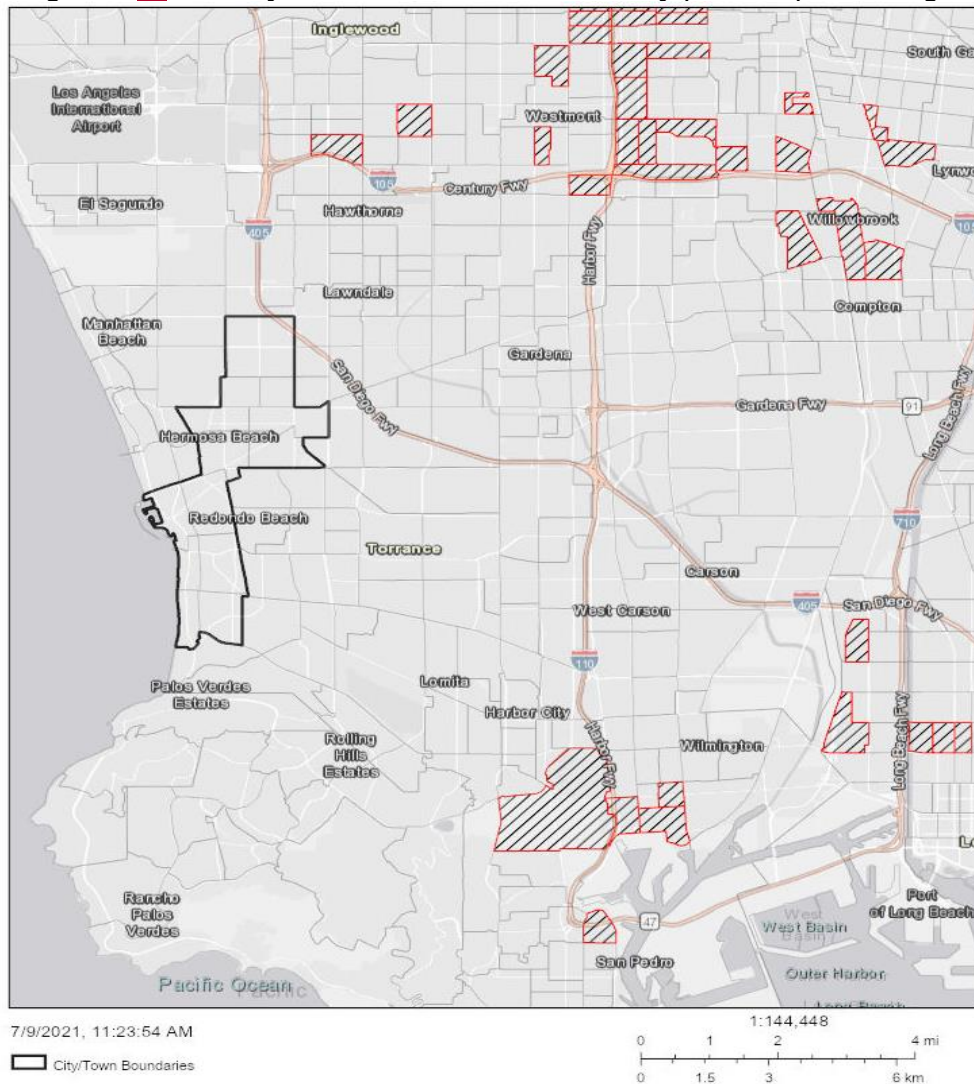


## C. Racially and Ethnically Concentrated Areas

### 1. Racially/Ethnically Concentrated Areas of Poverty

In an effort to identify racially/ethnically-concentrated areas of poverty (RECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and has a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. In Los Angeles County, there are RECAPs scattered in small areas as one moves toward Downtown Los Angeles and then in the City of Long Beach (Figure D-17). There are no RECAPs in Redondo Beach.

**Figure D-17: Racially Concentrated Areas of Poverty (RECAPs) in the Region**



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## 2. Racially Concentrated Areas of Affluence

While racially concentrated areas of poverty and segregation (RECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, RCA is defined as affluent, White communities.<sup>7</sup> According to HUD's policy paper, Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.”

RCAs have not been studied extensively nor has a standard definition been published by HCD or HUD, this fair housing assessment uses the percent White population and median household income as proxies to identify potential areas of affluence. As [Figure D-18](#) and [Figure D-19](#) show, census tracts with a large white population (over 50 percent) and highest median income make up most of the City. As [Table D-8](#) shows, White households also tend to have higher median incomes than all households as seen in the County as a whole. In Redondo Beach, White households and all households in the City have higher median incomes than Lawndale, Torrance, and the County. Redondo Beach also has a very high proportion of white only residents compared to the neighboring Cities, especially Lawndale.

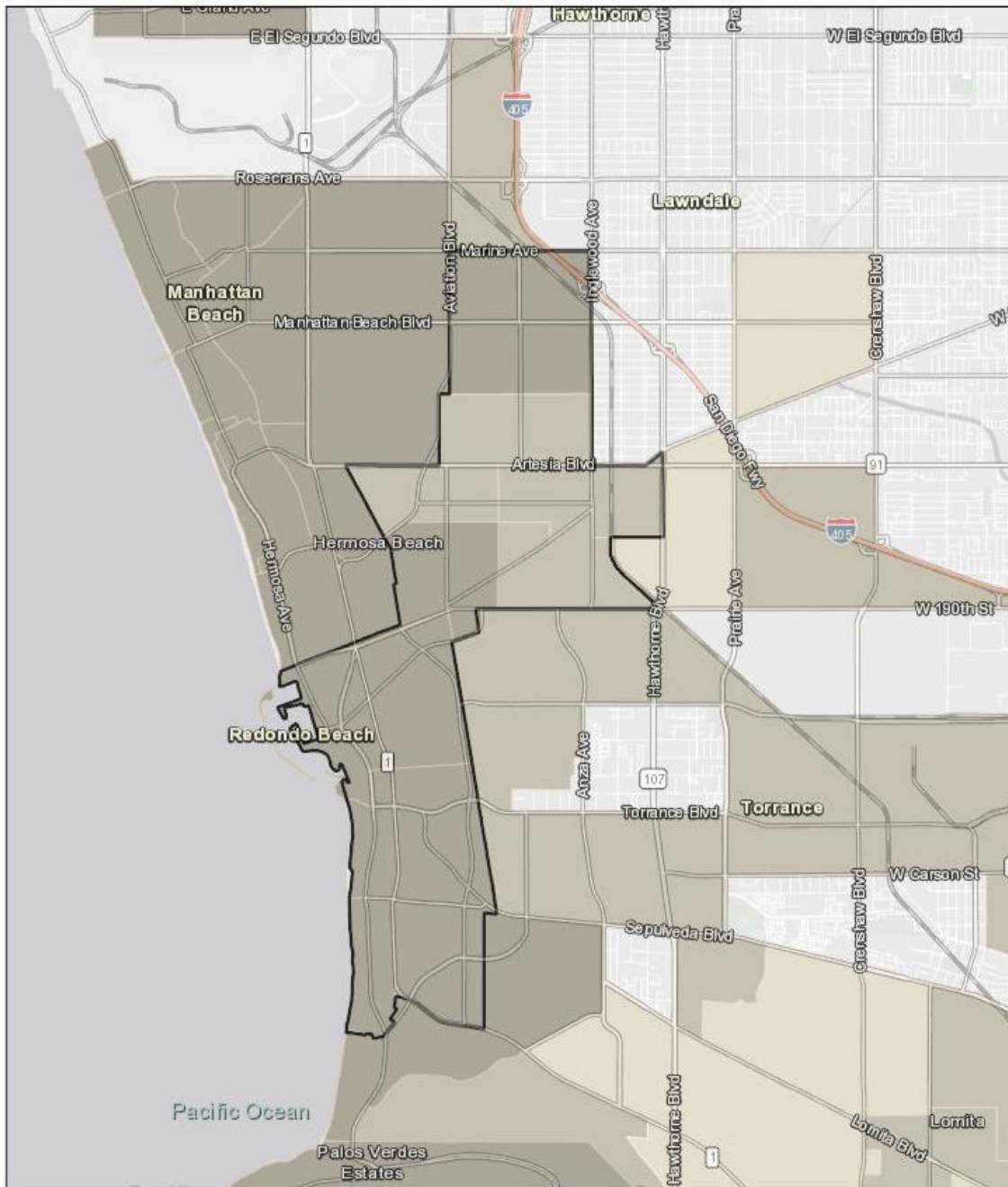
	<b>Redondo Beach</b>	<b>Lawndale</b>	<b>Torrance</b>	<b>Los Angeles County</b>
<b>Median HH Income</b>				
All Households	\$113,499	\$62,013	\$93,492	\$68,044
White alone	\$114,103	\$69,902	\$93,760	\$88,038
<b>White Population</b>	60.0%	14.6%	34%	25.9%

Source: 2015-2019 ACS.

<sup>7</sup> Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation. Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in Cityscape: A Journal of Policy Development and Research (21,1, 99-123).



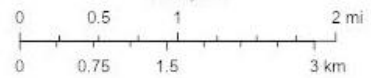
**Figure D-18: White Majority Population**



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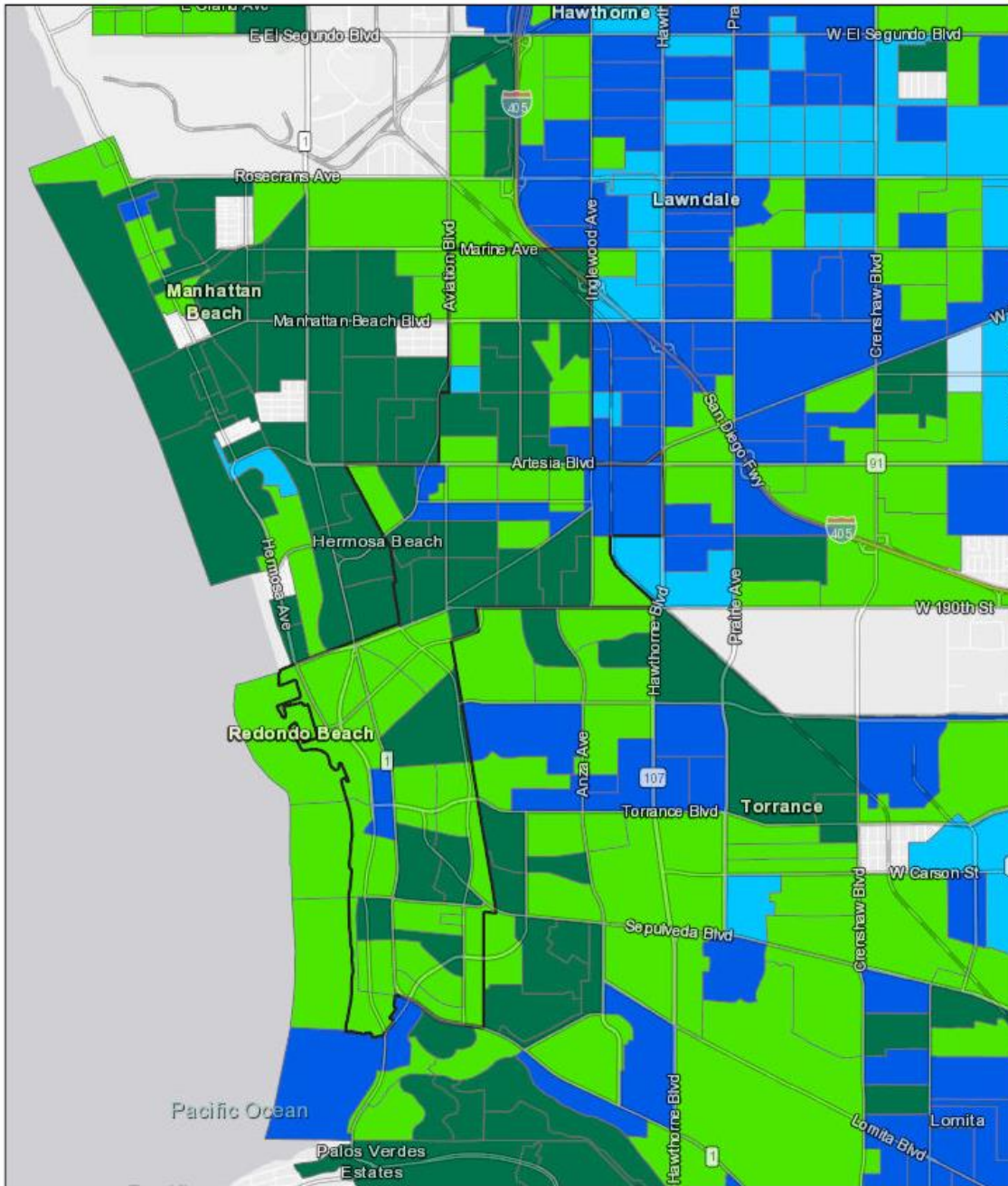
-  City/Town Boundaries
- (R) Predominant Population - White Majority Tracts
  -  Slim (gap < 10%)
  -  Sizeable (gap 10% - 50%)
  -  Predominant (gap > 50%)



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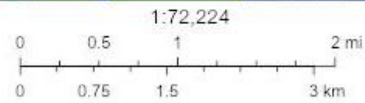
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Figure D-19: Median Income



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- City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group
- < \$30,000
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000



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## **D. Access to Opportunities**

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. Table D-9 shows index scores for the following opportunity indicator indices (values range from 0 to 100):

- **Low Poverty Index:** The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The higher the value, the better environmental quality of a neighborhood.

In Redondo Beach, most residents regardless of race/ethnicity has low poverty rates, great schools, high labor force participation and low cost transportation (Table D-9). The environmental scores for the City however are very low. With the City's proportion of Black and Native American residents being small there is little to no data available for these groups below the poverty level.

Redondo Beach residents, regardless of race or ethnicity, had better index scores compared to the County. The County did have better environmental scores as a whole.



**Table D-9: Opportunity Indicators by Race/Ethnicity**

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>Redondo Beach</b>							
<b>Total Population</b>							
White, Non-Hispanic	85.81	93.78	88.25	90.05	80.85	54.71	1.19
Black, Non-Hispanic	82.98	92.09	86.74	90.83	81.80	54.89	0.83
Hispanic	84.88	92.45	87.05	90.48	80.95	54.38	0.79
Asian or Pacific Islander, Non-Hispanic	85.18	92.89	87.07	90.51	81.17	54.98	0.92
Native American, Non-Hispanic	85.10	93.59	87.82	90.19	81.23	53.81	1.04
<b>Population below federal poverty line</b>							
White, Non-Hispanic	84.69	94.13	87.93	90.43	82.17	55.43	1.08
Black, Non-Hispanic	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Hispanic	83.20	93.36	86.57	90.73	82.00	52.47	0.54
Asian or Pacific Islander, Non-Hispanic	81.36	91.29	84.79	91.95	83.34	54.33	0.94
Native American, Non-Hispanic	N/a	N/a	N/a	N/a	N/a	N/a	N/a
<b>Los Angeles County</b>							
<b>Total Population</b>							
White, Non-Hispanic	65.19	68.03	67.43	77.63	73.13	54.59	21.35
Black, Non-Hispanic	36.07	33.82	35.34	87.25	79.02	40.72	11.92
Hispanic	35.53	39.72	35.73	86.48	77.78	43.70	12.36
Asian or Pacific Islander, Non-Hispanic	55.03	61.94	57.64	85.13	75.98	51.11	13.13
Native American, Non-Hispanic	48.40	50.70	48.58	81.04	75.36	45.88	17.68
<b>Population below federal poverty line</b>							
White, Non-Hispanic	53.66	60.62	59.62	83.19	78.51	56.98	18.46
Black, Non-Hispanic	24.12	28.03	26.41	88.34	81.07	36.90	11.74
Hispanic	25.05	33.70	29.50	89.09	80.94	44.63	10.63
Asian or Pacific Islander, Non-Hispanic	45.45	57.59	51.41	88.58	80.61	52.88	11.05
Native American, Non-Hispanic	33.63	39.10	36.05	84.43	78.22	47.65	16.22
Source: Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool (AFFH-T), 2020.							

To assist in this analysis, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children

in housing financed with 9% Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Higher composite scores mean higher resources. [Table D-10](#) shows the full list of indicators that go into the calculation of the index scores.

Table D-10: Domains and List of Indicators for Opportunity Maps	
Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 4.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020.	

The following opportunity map scores are for the census tracts that make up Redondo Beach ([Table D-11](#)). Consistent with the HUD’s R/ECAP database, there are no areas of high segregation and poverty in the City. All of the City’s census tracts are of highest resource so all of the City’s RHNA units are also in the highest resource areas. Opportunity map scores by Census tract and RHNA unit distribution are presented in [Figure D-20](#). The distribution of the sites inventory has allowed the City to provide feasible sites that can facilitate lower income housing in locations that have great access to transit by locating RHNA sites along the City’s transportation corridors, freeway access, and transit stations. Economic, environmental, and education scores for the City are further detailed below.

<b>Table D-11: Domains and List of Indicators for Opportunity Maps</b>					
<b>Census Tract</b>	<b>Economic Domain Score</b>	<b>Environmental Domain Score</b>	<b>Education Domain Score</b>	<b>Composite Index Score</b>	<b>Final Category</b>
6037620501	0.89	0.78	0.83	0.67	Highest Resource
6037620522	0.83	0.95	0.97	0.95	Highest Resource
6037620601	0.77	0.87	0.94	0.75	Highest Resource
6037620602	0.82	0.78	0.95	0.8	Highest Resource
6037620701	0.93	0.90	0.99	1.14	Highest Resource
6037620702	0.90	0.85	0.98	0.99	Highest Resource
6037621201	0.91	0.79	0.98	0.98	Highest Resource
6037621204	0.91	0.89	0.98	1.02	Highest Resource
6037621204	0.91	0.89	0.98	1.02	Highest Resource
6037621324	0.89	0.90	0.99	1.03	Highest Resource
6037621326	0.95	0.92	0.98	1.15	Highest Resource
6037621400	0.91	0.91	0.99	1.07	Highest Resource
6037621301	0.89	0.86	0.99	1.03	Highest Resource

Source: California Fair Housing Task Force, TCAC/HCD Opportunity Maps, 2021 Statewide Summary Table. December 2020.

**Figure D-20: Opportunity Score by Census Tract and RHNA Distribution – North of 190th**

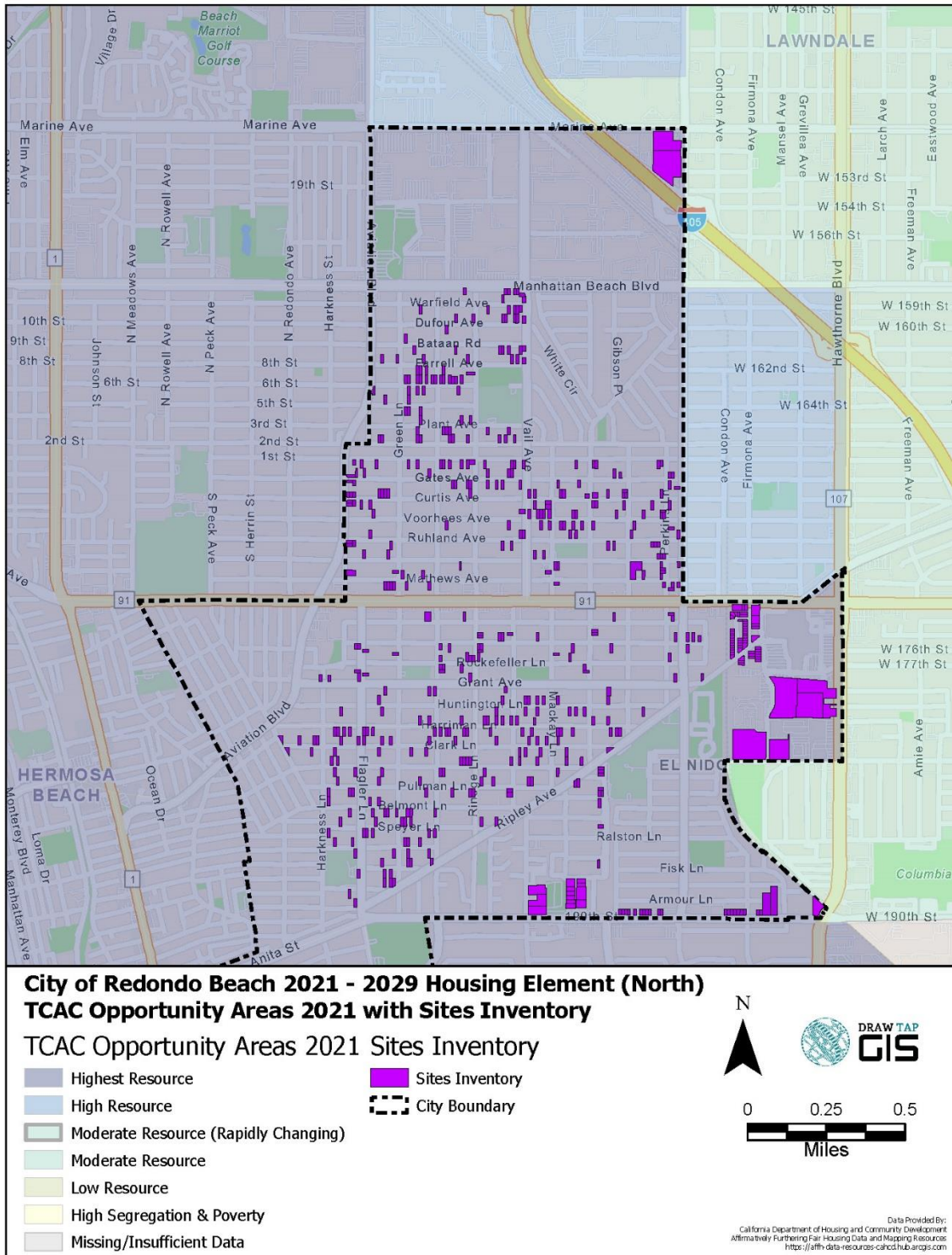
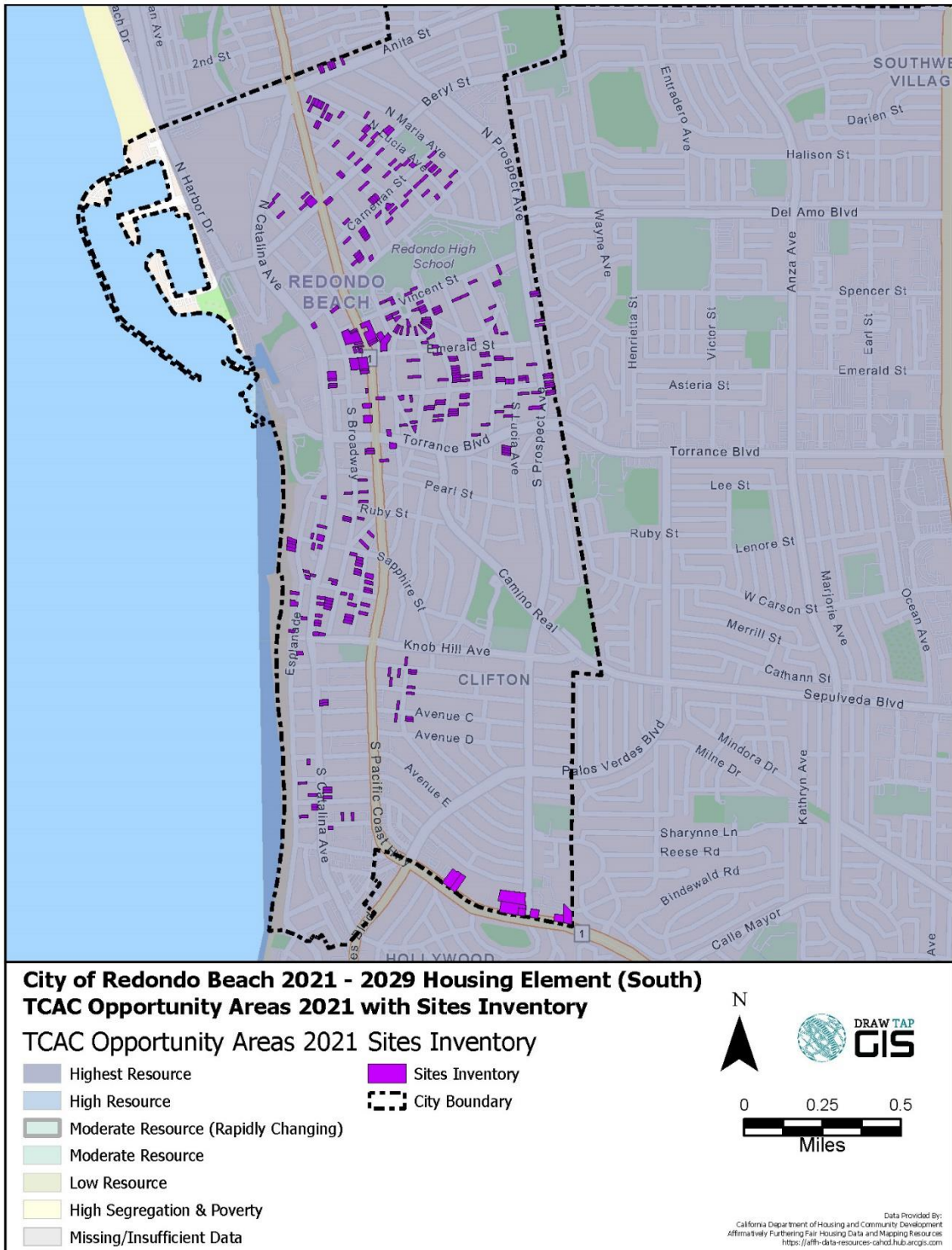


Figure D-21: Opportunity Score by Census Tract and RHNA Distribution – South of 190th





## 1. Education

Five out of 13 schools in Redondo Beach are designated as a Title 1 school. The schools are Adams Middle, Beryl Heights Elementary, Madison Elementary, Patricia Dreizler Continuation High, and Redondo Beach Learning Academy. These schools coordinate and integrate resources and services from federal, state, and local sources.

To be considered for Title 1 school funds, at least 40 percent of the students must be considered low-income. Kidsdata.org, a program of the Lucile Packard Foundation for Children's Health, estimated that only 4.2 percent of children aged 0-17 in Redondo Beach were living in low-income working families between 2012 and 2016.<sup>8</sup>

Kidsdata.org also reported that in 2019, 19 percent of students are considered high-need (i.e. those who are eligible for free or reduced price school meals, are English Learners, or are foster youth—as reported in the Unduplicated Pupil Count) compared to 71.2 percent of students in the County.

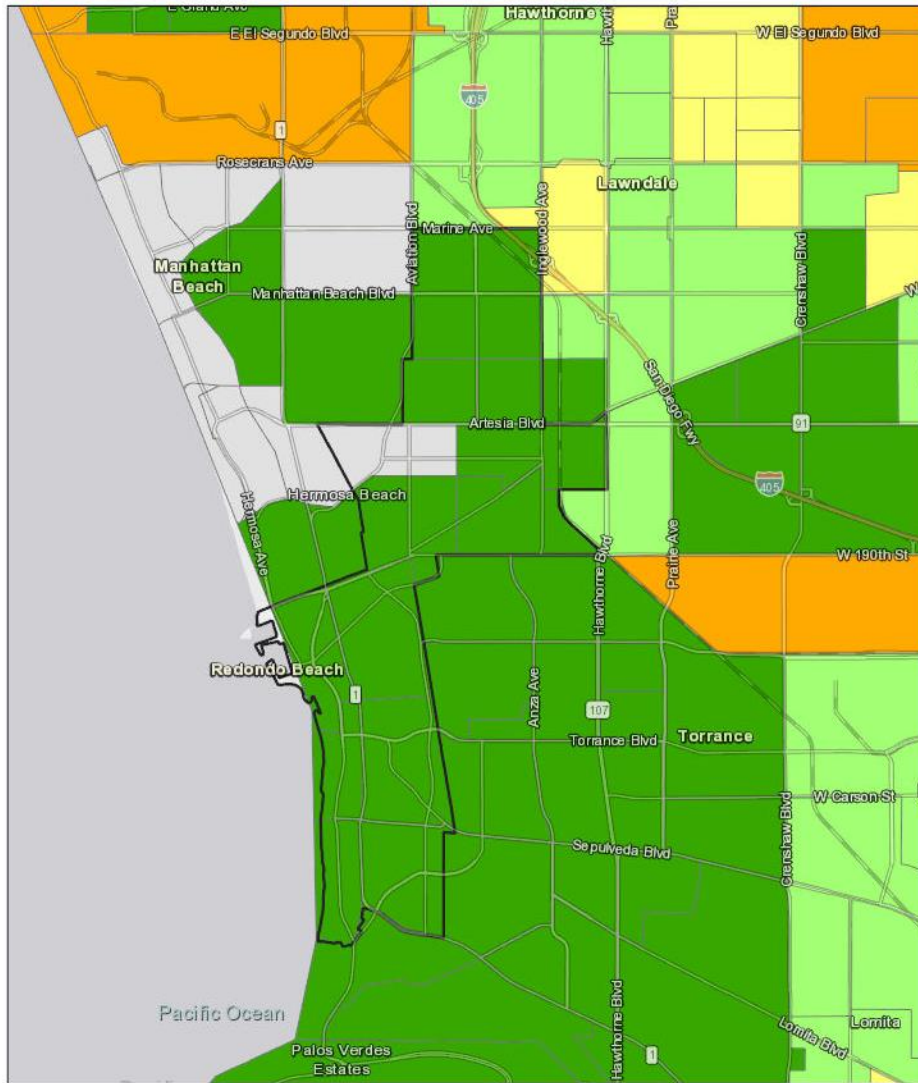
As described above, the Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. [Figure D-22](#) shows the education scores of each census tract in the City. Education scores in the City range are all positive.

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<sup>8</sup> Definition of “low income working family”: children ages 0-17 living in families with incomes below 200 percent of their federal poverty threshold and with at least one resident parent who worked at least 50 weeks in the 12 months prior to the survey.



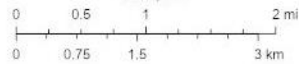
**Figure D-22: Education Score by Census Tract**



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- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Education Score -Tract
- < 0.25 (Less Positive Education Outcomes)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Education Outcomes)
- No Data



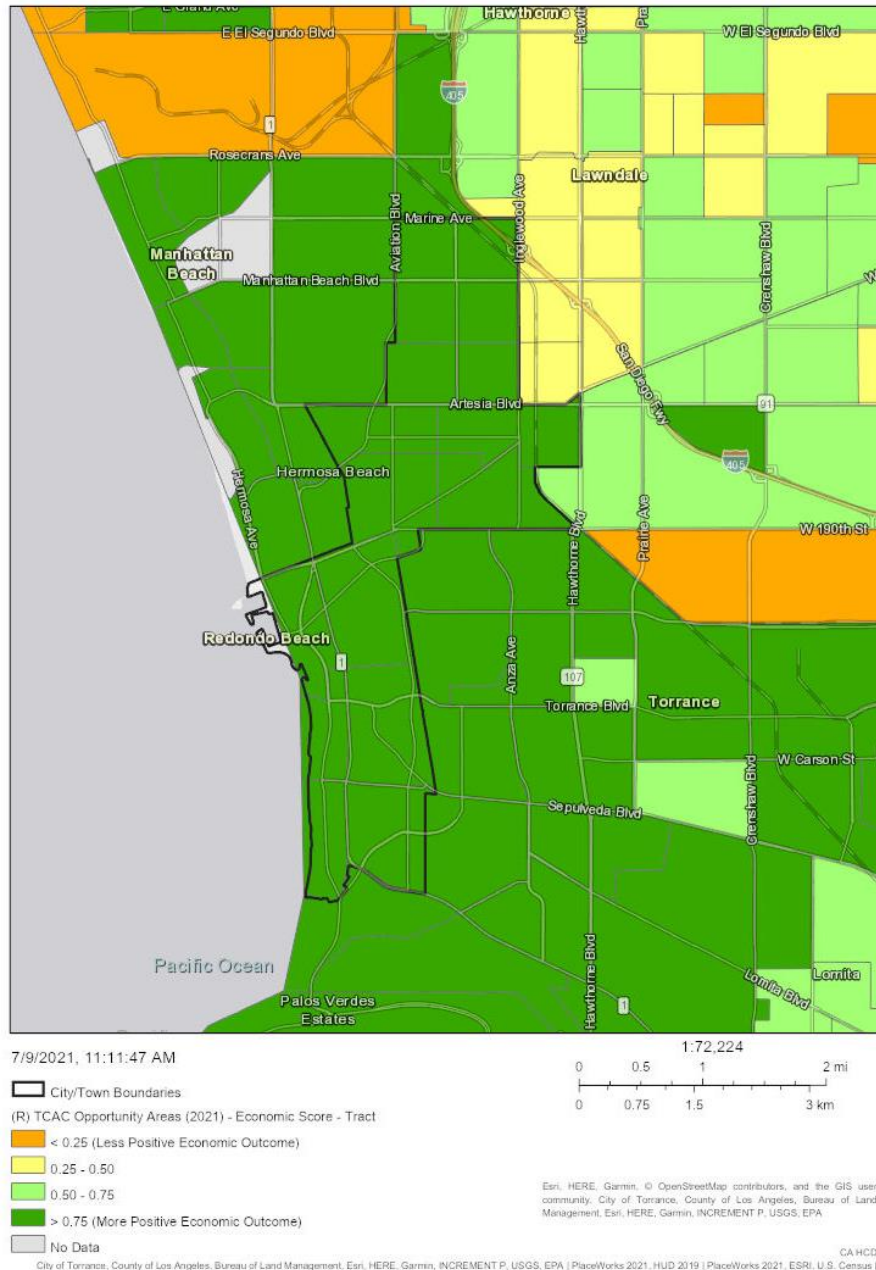
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## 2. Economic

As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. According to the 2021 Task Force maps presented in [Figure D-23](#), the census tracts in the City are all of high economic scores. The most recent unemployment rates published by the California Employment and Development Department (April 2021) show that Redondo Beach’s unemployment rate is 7.7 percent. Los Angeles County’s is at 10.1 percent.

**Figure D-23: Economic Score by Census Tract**

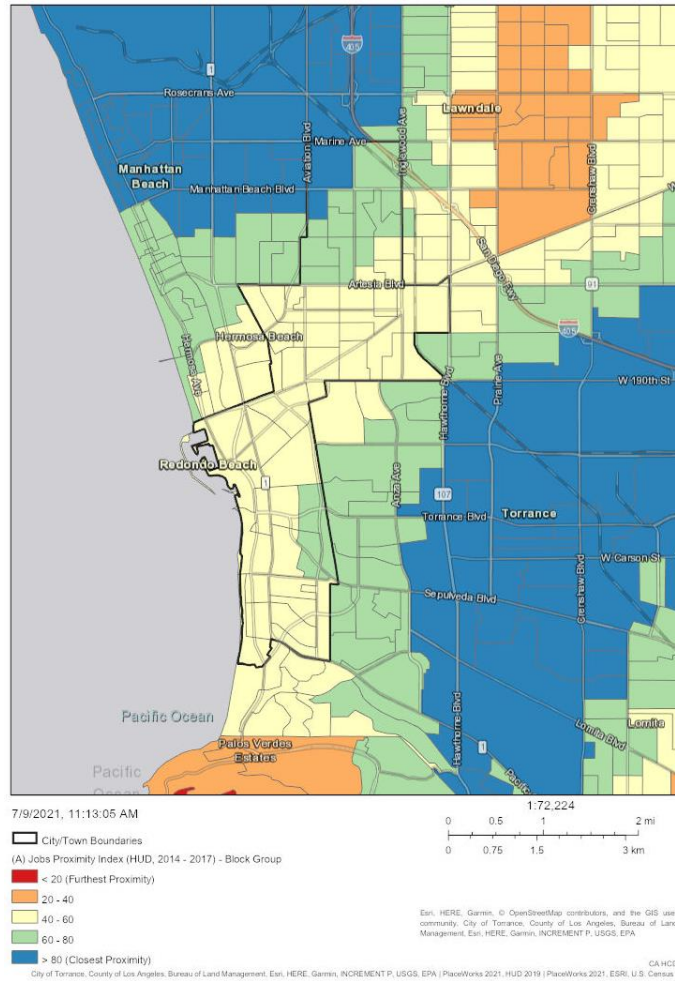


### 3. Transportation

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided by All Transit, Redondo Beach's All Transit Performance score of 6.6, illustrating a moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. The County All Transit score is 6.8. Redondo Beach however has a lower proportion of commuters that use transit (1.47 percent) than the County (6.66 percent).

HUD's Job Proximity Index, described previously, can be used to show transportation need geographically. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation. As shown in [Figure D-24](#), block groups in the City have scores between 20 to 80 showing that there is low to moderate proximity to jobs for most of the City's residents. The City does not have severe isolation when it comes to job proximity. South of Redondo Beach has some lower scores as Palos Verdes Estates has little to no job sectors as well as to the northeast that consists of a lot of residential developments compared to the number of local jobs. Overall, the City's RHNA strategy is to locate sites along the City's transportation and commercial corridors that provide freeway access and access to transit.

**Figure D-24: Job Proximity Index by Census Block Group**



#### 4. Environmental

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 4.0 pollution indicators and values. [Figure D-25](#) shows that there are good environmental scores within the City limits compared to those in the surrounding area. The majority of the City’s RHNA is located in the 11 to 20 and 21 to 30 percent score range ([Table D-12](#)). About 37 percent of the City’s lower income RHNA units are in the tracts with a low score of less than 20. The remaining 63 percent of lower income RHNA units are in tracts with a moderately low score of 21 to 40, primarily as recycling of existing light industrial uses into residential uses. One such area is the 190<sup>th</sup> Street Residential Overlay. This area is located within existing multi-family neighborhoods. Transitioning this area into residential uses has the beneficial impact of remediating existing environmental hazards and provide housing that is compatible with existing uses. Other areas such as the South of Transit Center and South Bay Market Place are located near public transit and approved housing of similar character.

The main reason for Redondo Beach to have better environmental scores than its neighbors is the City’s active trend of recycling existing old uses with new development, and therefore

has the opportunity to improve environmental conditions in the community. Whereas neighbors such as Lawndale have relatively stagnant development activities.

According to the American Lung Association’s State of the Air report, Los Angeles County received an Ozone score of “F”, which means that the County experienced numerous days of unhealthy air pollution as compared to other counties and regions in the study. Over a three-year period, there were 114 days of unhealthy air that contributed to the Ozone score.

<b>Table D-12: RHNA Unit Distribution by CalEnviroScreen 4.0 Scores</b>				
<b>% LMI HH</b>	<b>Lower</b>	<b>Moderate</b>	<b>AM</b>	<b>Total Units</b>
1 - 10% (Lowest Score)	<u>13.1%</u>	<u>11.7%</u>	<u>0.9%</u>	<u>9.5%</u>
11 - 20%	<u>24.3%</u>	<u>63.0%</u>	<u>27.0%</u>	<u>34.3%</u>
21 - 30%	<u>5.0%</u>	<u>9.5%</u>	<u>53.8%</u>	<u>18.9%</u>
31 - 40%	<u>57.6%</u>	<u>15.8%</u>	<u>18.3%</u>	<u>37.2%</u>
41 - 50%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
51 - 60%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
61 - 70%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
71 - 80%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
81 - 90%	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
91 - 100% (Highest Score)	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
Total Units	<u>1,409</u>	<u>683</u>	<u>749</u>	<u>2,841</u>



Figure D-25: Environmental Score by Census Tract and RHNA Distribution – North of 190th

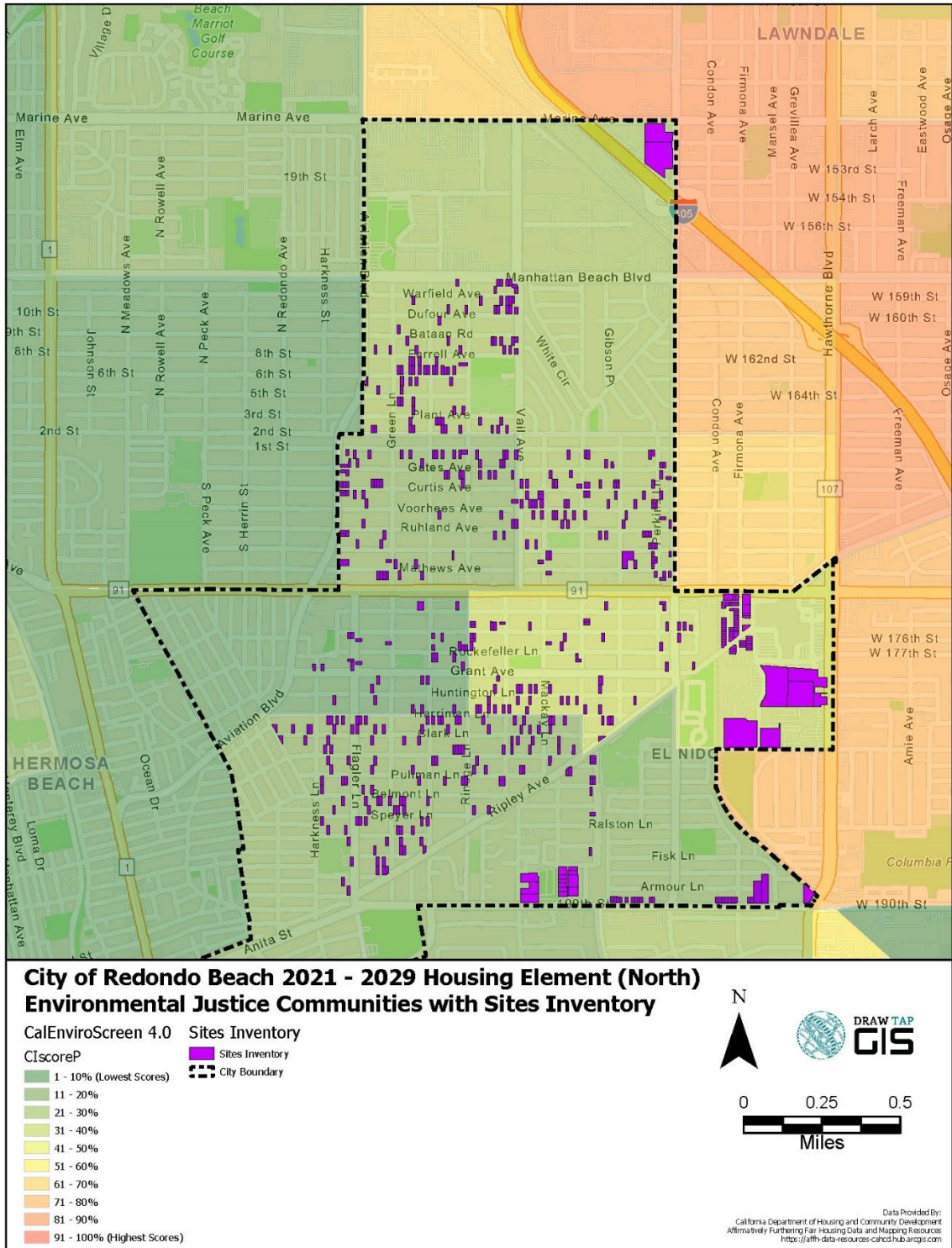
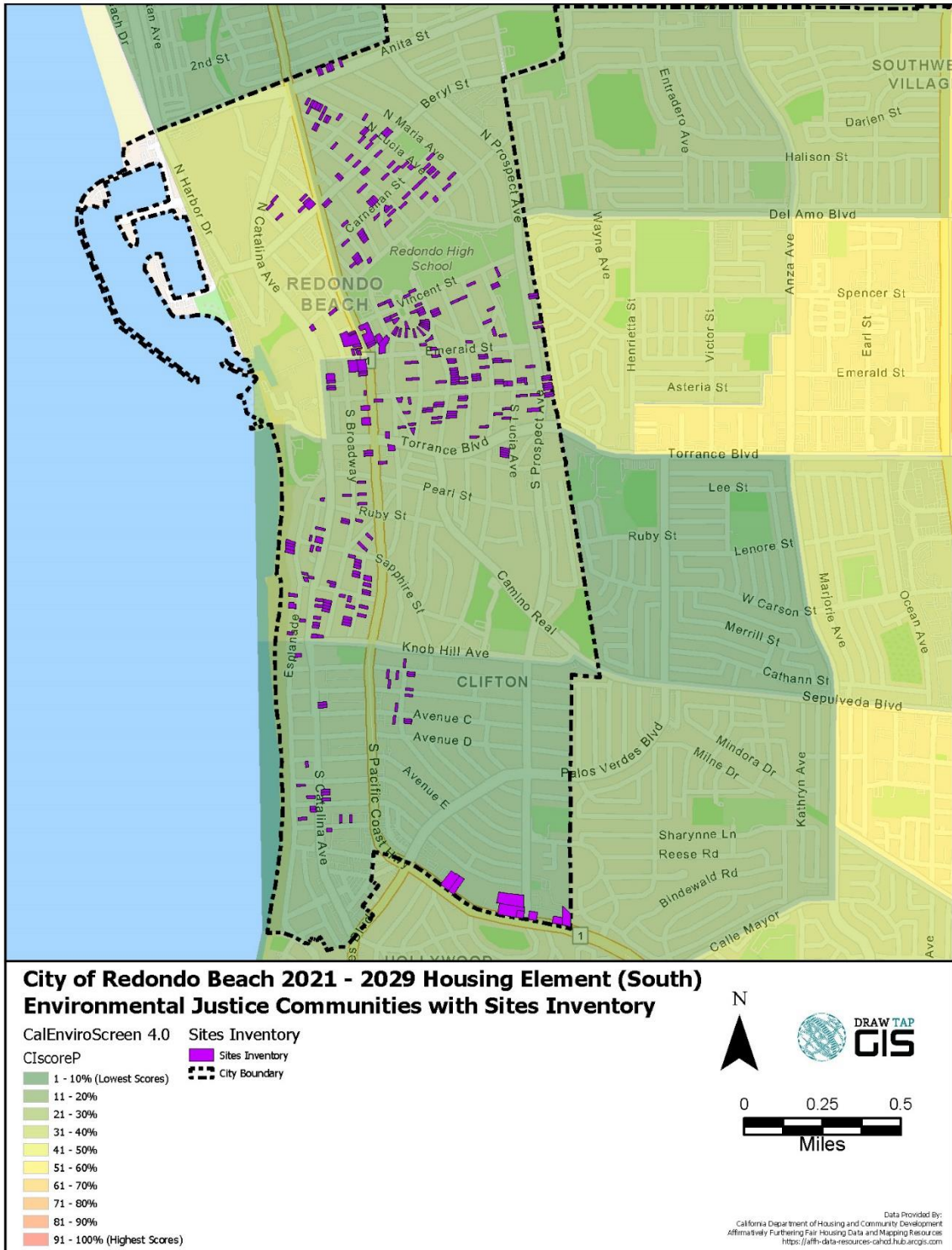




Figure D-26: Environmental Score by Census Tract and RHNA Distribution – South of 190th



## **E. Disproportionate Housing Needs**

The AFFH Rule Guidebook defines ‘disproportionate housing needs’ as ‘a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.’ 24 C.F.R. § 5.152” The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing.

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Redondo Beach. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and/or
- Units with physical defects (lacking complete kitchen or bathroom)

### **1. Cost Burden**

Measuring the portion of a household’s gross income that is spent for housing is an indicator of the dynamics of demand and supply. This measurement is often expressed in terms of “over payers”: households paying an excessive amount of their income for housing, therefore decreasing the amount of disposable income available for other needs. This indicator is an important measurement of local housing market conditions as it reflects the affordability of housing in the community. Federal and state agencies use overpayment indicators to determine the extent and level of funding and support that should be allocated to a community. State and federal programs typically define over-payers as those lower income households paying over 30% of household income for housing costs. A household is considered experiencing a severe cost burden if it spends more than 50% of its gross income on housing.

Table D-13 provides overpayment detail by income group and household type for Redondo Beach between 2013 and 2017. Approximately 77 percent of low income households, 80 percent of very low income households, and 80 percent of extremely low income households were overpaying versus 21 percent of moderate income households. Out of all the households in the City about 36 percent overpay for housing.

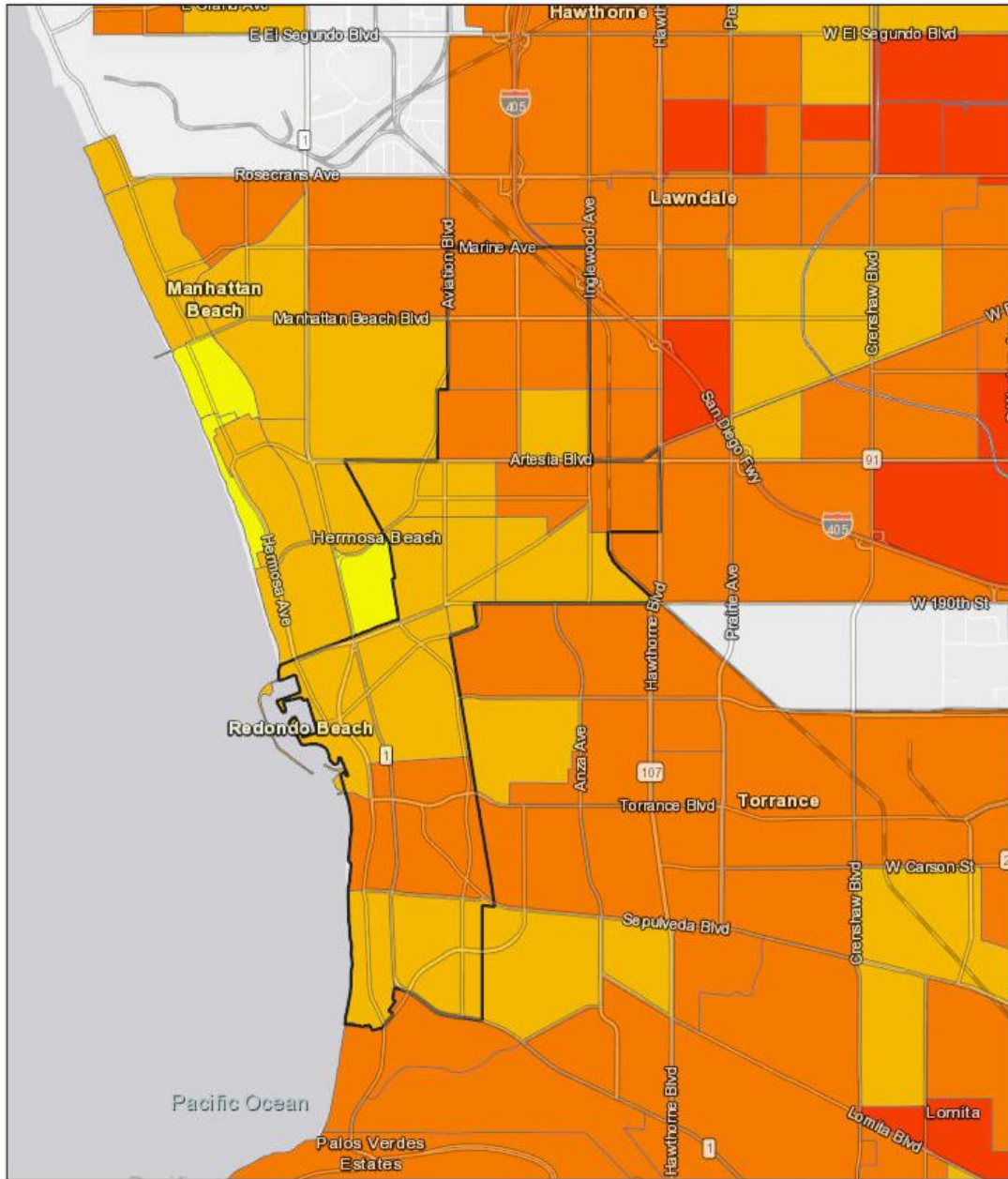
**Table D-13: Housing Type and Cost Burden**

Household by Type, Income, and Housing Problem	Renters				Owners				Total HHs
	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Families	Total Owners	
<b>Extremely Low Income (0-30% AMI)</b>	510	195	15	1,370	470	115	0	695	2,065
With cost burden >30%	88.2%	79.5%	0.0%	79.9%	81.9%	78.3%	0%	80.6%	80.1%
With cost burden > 50%	72.5%	79.5%	0.0%	74.1%	72.3%	60.9%	0%	69.8%	72.6%
<b>Very Low Income (31-50% AMI)</b>	450	645	15	1,520	735	160	25	995	2,515
With cost burden >30%	74.4%	96.9%	100.0%	91.1%	55.1%	93.8%	16.0%	62.7%	79.9%
With cost burden > 50%	64.4%	60.5%	100.0%	70.1%	40.1%	81.3%	16.0%	47.1%	61.0%
<b>Low Income (51-80% AMI)</b>	285	810	55	1,685	570	230	35	950	2,635
With cost burden >30%	75.4%	88.3%	100.0%	89.3%	52.6%	60.9%	97.1%	56.2%	77.4%
With cost burden > 50%	29.8%	29.0%	0.0%	31.5%	25.4%	39.1%	11.4%	29.9%	30.9%
<b>Moderate Income (81-100% AMI)</b>	760	4,140	530	9,265	2,565	6,510	515	11,335	20,600
With cost burden >30%	25.0%	16.9%	13.0%	17.5%	23.6%	22.4%	48.5%	24.6%	21.4%
With cost burden > 50%	4.6%	1.2%	0.0%	1.4%	6.2%	5.4%	9.7%	6.3%	4.1%
<b>Total Households</b>	2,005	5,790	615	13,840	4,340	7,015	575	13,975	27,815
With cost burden >30%	59.4%	37.9%	22.6%	40.5%	39.1%	26.2%	50.1%	32.2%	36.3%
% With cost burden >30%	38.9%	14.3%	2.4%	19.8%	21.7%	9.1%	10.1%	14.0%	16.9%

Source: HUD CHAS 2013-2017.

[Figure D-27](#) shows the census tracts in the City and the percent of households in renter-occupied housing units that have a cost burden. The census tracts in the city have a range from 20 to 60 percent of the renter households over paying for their housing unit. [Figure D-28](#) shows the percent of owner households that have a mortgage or mortgages with monthly owner costs that are 30 percent or more of household income. All census tracts in the City have 20 to 40 or 40 to 60 percent of households that pay more than 30 percent of their household income to their monthly housing costs.

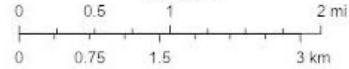
**Figure D-27: Overpayment – Renter Households**



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1:72,224

City/Town Boundaries



(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

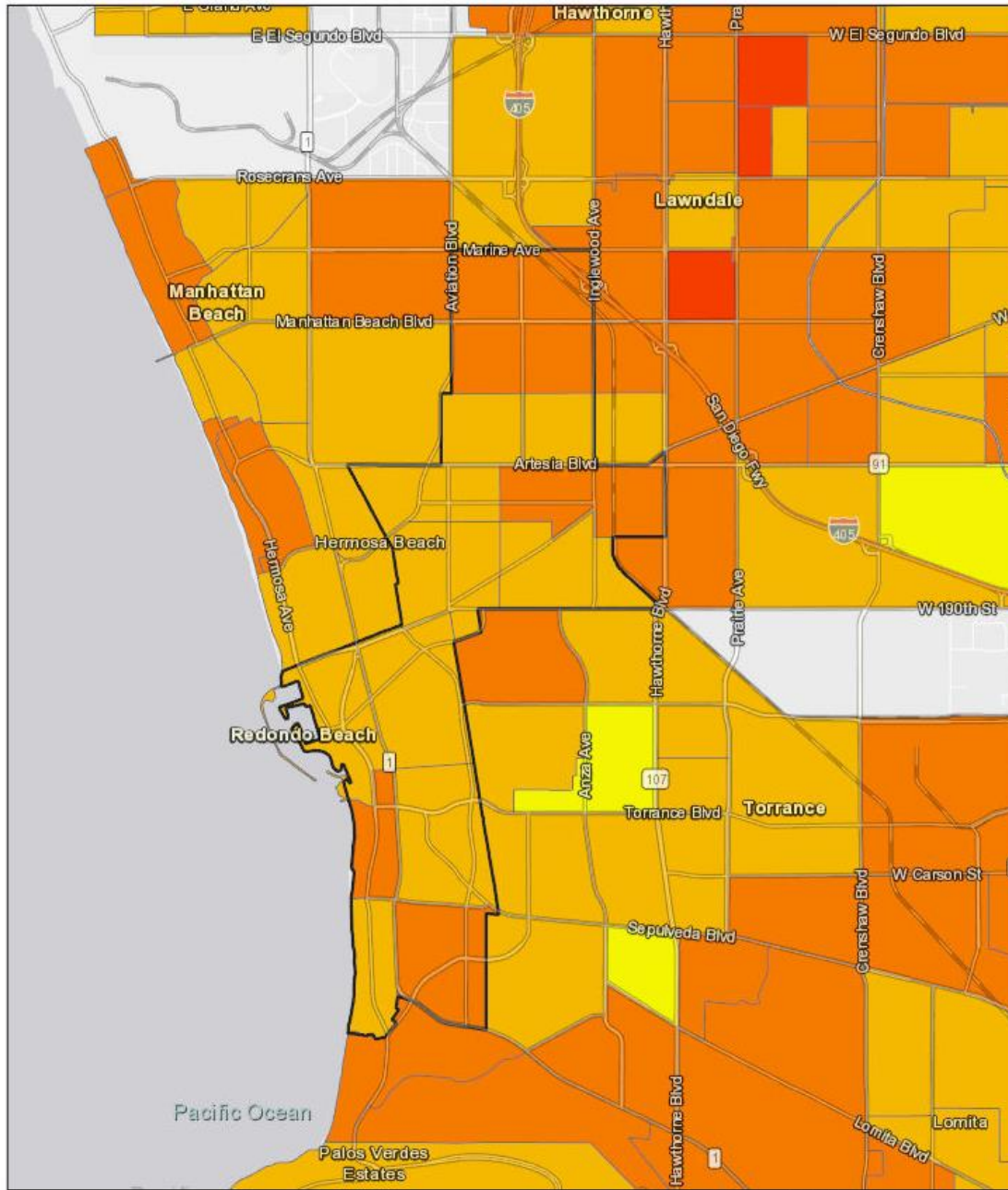
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%

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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | CA HCD



**Figure D-28: Overpayment – Owner Households**

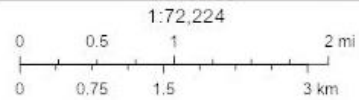


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City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%



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## 2. Overcrowding

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). The 2011-2015 ACS reported that almost 2 percent of Redondo Beach households lived in overcrowded conditions ([Table D-14](#)). Overcrowding disproportionately affected renters (78 percent of renters versus just 22 percent of owners); indicating overcrowding may be the result of an inadequate supply of larger sized rental units. The 2015-2019 ACS reported that overcrowding increased to over two percent of all households. Similarly, renter-households were more prone to overcrowding (72 percent) compared to owner-households (28 percent).

Category	2011-2015		2015-2019	
	Number	%	Number	%
Occupied Housing Units	27,733	100.0%	27,633	100.0%
Overcrowded Units	493	1.8%	603	2.2%
Owner-occupied	109	22.1%	172	28.5%
Renter-occupied	384	77.9%	431	71.5%
Units with 1.01-1.50 persons/room	398	80.7%	462	76.6%
Units with 1.51-2.00 persons/room	78	15.8%	102	16.9%
Units with 2.01 or more persons/room	17	3.45%	39	6.5%
Source: 2011-2015 and 2015-2019 ACS.				

In Los Angeles County, renter-households were also more prone to overcrowding with 17 percent of households begin overcrowded and eight percent being severely overcrowded. In the county overall, there is a smaller proportion of households overcrowded than in Redondo Beach.

## 3. Substandard Conditions

The City estimates that about 165 housing units in Redondo Beach are in substandard condition. The City’s Code Enforcement Staff estimates complaints concerning dilapidated structures and dwelling units in need of substantial rehabilitation are filed at a rate of approximated 1-3 per month. The City’s Code Enforcement Staff notes current trends concerning substandard housing conditions generally evolve from unpermitted conversions of portions of existing structures and older residential units with owners that have aged in place or where the original owners have deceased and left their properties to children or grandchildren and the residences are either vacant for extended periods or converted to rental properties with minimal maintenance. And although some of the units considered as substandard in the Censuses have been rehabilitated, many are in the same condition.

Housing age is frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Over 65 percent of housing is over 40 years old in the City according the 2015-2019 ACS.



In Los Angeles County, 85.9 percent of the Countywide housing stock may be susceptible to deterioration because it was built prior to 1990. Also, over 60 percent of the County’s housing stock is over 50 years old. This could mean that the County has many units in multiple communities that require substantial rehabilitation.

#### 4. Homeless Population

Homelessness is a regional (and national) problem, and in a major metropolitan region, individual municipal governments lack the resources to implement solutions to eliminate homelessness. While the exact number of homeless people in the City on any given night is unknown, a relatively small share of the region’s homeless population is found in Redondo Beach. The 2020 Greater Los Angeles Homeless Count, completed by the Los Angeles Homeless Services Authority (LAHSA), estimates that there were 173 people experiencing homelessness in Redondo Beach – a decrease from the 216 people in the City during the 2016 LAHSA homeless count.

To respond to the needs of the homeless population Redondo Beach started a Response to Homelessness Pilot Program, approved by the Mayor and City Council, in June of 2019 as an enhanced response to the impact of homelessness, not only on people experiencing homeless, but also on residents and the community.

In April of 2021, the Redondo Beach Mayor and City Council voted to make the Response to Homelessness Program permanent, which includes key components such as the Housing Initiative Court and bridge housing like the Pallet Shelters. The approval also included funding for an additional housing navigator. The expectation is to keep the program under the administration of the City Attorney’s Office for at least three years.

#### 5. Region Disproportionate Housing Needs

In the local region which consists of the Los Angeles and Long Beach Metro Area, just over 50 percent of all households have at least one housing problem. Specifically, family households with five or more people are more susceptible to housing problems.

	# With problems	# Households	% With problems
Family households, <5 people	1,029,920	2,301,365	44.75%
Family households, 5+ people	434,995	628,630	69.20%
Non-family households	718,155	1,368,880	52.46%

Source: HUD CHAS 2013-2017.

## 6. Displacement Risk

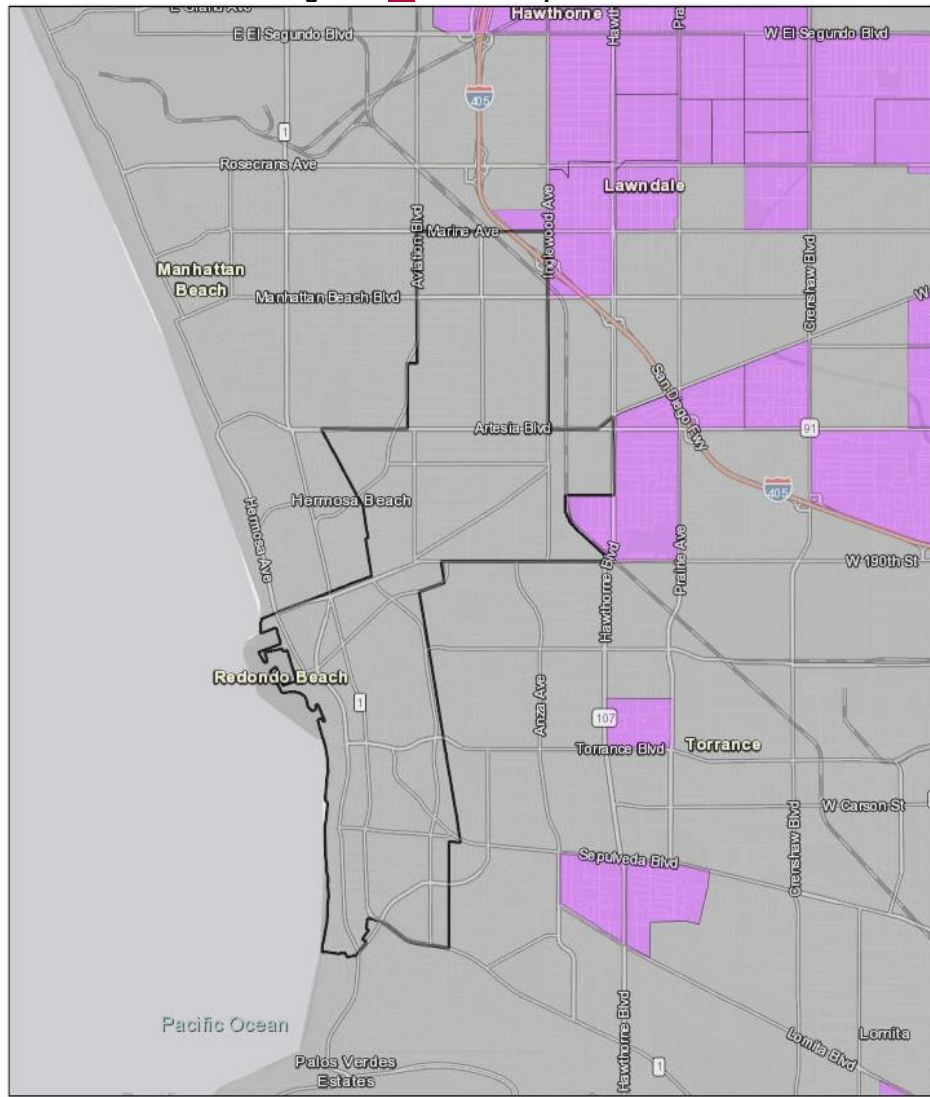
Cost of housing within the City has become high and unattainable for a lot of residents. In 2020 the median sales price for a single-family home in Redondo Beach was \$1,160,000 and increasing 13.5 percent to \$1,316,500 in 2021. Even though the City has a higher median income than most of the County, the average home sale prices could lead to residents moving out of the City because of the economic pressures of home ownership.

HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low income residents is above 20 percent; and
- The tract meets two of the following criteria:
  - Share of renters is above 40 percent,
  - Share of people of color is above 50 percent,
  - Share of very low-income households (50 percent AMI or below) that are severely rent burdened households is above the county median,
  - They or areas in close proximity have been experiencing displacement pressures (percent change in rent above County median for rent increases), or
  - Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

[Figure D-29](#) identifies that there are census tracts that are considered to be vulnerable to urban displacement that surround the City. These communities are areas that have a higher concentration of low and moderate income persons and could affect the census tracts nearby within City limits. According to the Urban Displacement Project by UCLA the City of Redondo Beach does not have policy measures in place to discourage displacement. Examples of measures that help to discourage displacement include a Just Cause Eviction Ordinance or Mobile Home Rent Control.

**Figure D-29: Urban Displacement**



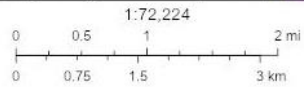
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City/Town Boundaries

(A) Sensitive Communities (UCB, Urban Displacement Project)

Vulnerable

Other



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census |

## **F. Summary of Fair Housing Issues from the Housing Element**

- Housing choices for special needs groups, especially persons with disabilities, are limited. Seniors make up over 20 percent of the City’s households. There are 6 licensed residential care facilities located in Redondo Beach.
- People obtain information through many media forms, not limited to traditional newspaper noticing or other print forms. A balance of new and old media needs to be found to expand access to fair housing resources and information with an increasing young adult and senior population within the City.
- Persons with disabilities are most likely to be affected by fair housing issues as they reportedly experience more housing discrimination than other groups. Persons with disabilities are also more likely to experience cost burdens, particularly if they rely on SSI as a form of income. Persons with disabilities are not concentrated in any particular location in the City, but with 66 percent of the City’s housing being 40 years or older could mean that the majority of the City’s housing stock does not comply with the Americans with Disabilities Act.
- With rising home prices in the City and surrounding communities, there are cost barriers for households wanting to live in the City. The lack of affordable housing for residents is a cause for possible displacement. Also, with a high proportion of supportive housing in the City being privately owned, there are fewer opportunities for community based housing.

### **D.3 Identification and Prioritization of Contributing Factors**

The following are contributing factors that affect fair housing choice in Redondo Beach.

#### **A. Insufficient and Inaccessible Outreach and Enforcement**

Although the City is improving on the variety of media it uses for outreach, there are limitations to what the City is able to accomplish. Outreaching to all populations in the City is challenging. The City also has limited funds that it can provide to support fair housing enforcement.

##### **Contributing Factors:**

- Lack of a variety of inputs media (e.g., meetings, surveys, interviews)
- Lack of accessibility to draft documents
- Lack of digital access
- Lack of accessible forums (e.g., webcast, effective communication, reasonable accommodation procedures)
- Lack of local public fair housing enforcement

## **B. Segregation and Integration**

The analysis found that the cost of home ownership within the City could be unattainable for a lot of residents and could cause a lot of economic pressure especially for low and moderate income households. Also within communities finding and accessing affordable rental housing can be difficult.

### **Contributing Factors:**

- Displacement of resident due to economic pressures
- Location and type of affordable housing
- Lack of supportive housing in community-based settings

## **C. Disproportionate Housing Needs, Including Displacement Risks**

There are Census tracts in the City that could have a risk of displacement because of their location near vulnerable communities. Because of the cost of single-family homes there is pressure for developers to construct larger unit apartments in the City which then is putting pressure on property owners to possibly remove long term tenants to sell their property or get renters who will pay a higher rent. The City however does not have policies in place that could discourage the displacement of residents.

### **Contributing Factors:**

- The availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private rental relief programs for people at risk of homelessness

## **D. Access to Opportunities**

In Redondo Beach changes to land use and zoning laws that could help to facilitate housing affordable to low and moderate income households could require a public vote. On November 4, 2008, Redondo Beach residents passed Ballot Measure DD that applies to major changes in allowable land use. “Major change in allowable land use” is defined as any proposed amendment, change, or replacement of the General Plan (including its local coastal element of the City’s zoning ordinance or of the zoning ordinance for the coastal zone), meeting any one or more of the following conditions requires a public vote:

- The conversion of public land to private use;
- The re-zoning of nonresidential land for housing or mixed-use projects with more than 8.8 units per acre; and
- Changes that significantly increase traffic, density or intensity (i.e., zoning changes that add more than 25 homes, 40,000 square feet of commercial space and/or yielding more than 150 peak hour car trips).

For the 2021-2029 Housing Element, the City relies on the capacity created by new land use designations as part of the General Plan Update to accommodate the City’s RHNA and

affirmatively further fair housing by providing new housing opportunities. The new General Plan will trigger Measure DD and is scheduled to be placed on the ballot in November 2022. The Housing Element includes a program to monitor the impact of Measure DD, as required by State law.



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

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

	<p>City should up zone all R1 zones to R2 or R3, and give incentives to combine lots for building even more densely.</p> <p>Cites a USC study that found in high rent areas a higher percentage of inclusionary (subsidized housing) can be supported.</p> <p>Notes that students living in the north tech area (Freeway) and transit center (South Galleria) housing sites will have to cross train tracks and at least one arterial roadway to get to elementary school. Claims this creates disparate pollution and traffic impacts on some residents. Comments on negative school impacts with plan.</p> <p>City should put housing above parking lot in Riviera Village and incentivize lot consolidation for mixed use in Riviera Village.</p> <p>Notes benefits of reducing segregation and includes a table with student economic and racial demographic information per school in Redondo Beach.</p> <p>Comments that AES power plant site should be developed with highest number of VLI/LI units in the City. Cites an environmental justice argument to support housing recommendation on AES site.</p> <p>Concludes with request that the City do better and more equitable zoning.</p> <p>Includes Appendixes with CalEnvironScreen data per City Census Tract, School Populations with Economic Data.</p>	<p>Any future redevelopment of high density residential within the North Tech District will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation the environmental justice issues will be addressed and mitigation as required determined through the associated environmental analysis.</p> <p>No Northrop Grumman properties are included as future housing sites.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
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04.12.2021	Therese Mufic Neustaedter	<p>Comments that Redondo Beach is “gaming” the Housing Element Update. Comments that RB downzoned southern part of town and added homes to northern end of town. Commenter questions putting housing overlays on northern industrial area next to freeway and between other busy roadways. Commenter attached letter with comments on Draft Housing Element from Grace Peng, PhD dated April 10, 2021.</p>	<p>The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city’s overall highest density remains within the southern area of the City.</p> <p>See responses above to commenter Grace Peng, PhD.</p>
05.11.2021	RUTAN & TUCKER, LLP, Attorneys representing fee owners of the 50-acre site on which AES operates	<p>Comments on Planning Commission’s vote, 5 to 2, in favor of mixed use allowing 30 dwelling units per acre for up to 50% of the Power Plant site. The property owner of the site agrees with Planning Commission’s recommendation.</p> <p>Comments on current status of the AES Power Plant permits to operate per the California State Water Resources Control Board.</p> <p>Comments on property owners plans for re-use of the Power Plant site.</p> <p>Notes that owner is wants to discuss with City Council the recommended re-use of the site for mixed use development of 30 DU/AC. Power plant site represents prototypical “underutilized” property that State Law has determined should be made available for future development.</p> <p>Comments that owner has developed a plan for closure and clearing of the site by 2027. Could have approximately half the site developed with residential by late 2025.</p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with</p>

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

	<p>behalf of Abundant Housing LA and YIMBY Law)</p>	<p>City fails to identify enough sites where RHNA housing growth can be accommodated by 2029.</p> <p>City's approach fails on three counts:</p> <ol style="list-style-type: none"> <li>1. The City proposes new housing in locations where it is highly unlikely to be built.</li> <li>2. The City does not encourage new housing in locations where it is likely to be built. Leave the City's underutilized land as-is.</li> <li>3. The City bans new mixed-use development in locations where it has successfully been built in recent years.</li> </ol> <p>1. Unlikely that the City's rezoning plan will encourage meaningful housing growth.</p> <ul style="list-style-type: none"> <li>• Area bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards – Not a credible site as Northrop Grumman is very unlikely to vacate Space Park over next 8 years.</li> <li>• Galleria District - Since the Galleria District developer is planning housing the remainder Galleria area should also be allowed to provide additional residential development. Instead City plans to allow additional residential development on surrounding properties, but those property owners have shown no interest in residential development.</li> </ul> <p>City failed to provide convincing evidence that redevelopment of above sites is likely to happen.</p> <p>2. The City overlooks a large number of potential housing sites, including:</p> <ul style="list-style-type: none"> <li>• The AES site (51 Acres). New owner proposes office, hotel, and retail and no residential. If entire site is built at 55 units per acre nearly all of RB's RHNA could be accommodated.</li> <li>• The former South Bay Medical Center (9.3 acres). Site should provide additional housing at 55 units per acre.</li> <li>• Beachside parking lots (24 acres). Should be developed with residential, similar to Marina Del Rey.</li> <li>• The Space Park and Aviation Park parking lots (62 acres). Northrop Grumman parking lots should be developed with residential.</li> </ul>	<p>the subject properties as potential sites for future high density residential and/or mixed use. To date staff has confirmed significant interest from the property owner of the largest shopping center in the North Tech District for the future additional development of high density residential at this location. Additionally, none of the property owners of the small sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties. Staff is continuing to investigate these sites. Staff does not anticipate that HCD will not accept the proposed housing sites based upon the overwhelming interest by property owners for potential high density residential on the determined housing sites per the draft housing element.</p> <p>As noted, none of the property owners of the proposed housing sites have expressed opposition to the potential future development of high density residential on their properties. Additionally, some of the subject property owners have experience with the "densification" of other properties they own/control that have existing commercial development.</p> <p>Mixed-use land designations are being maintained on properties with existing mixed-use developments as well as in</p>
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	<ul style="list-style-type: none"> <li>• The Riviera Village parking lots. Should be developed with 60 or 215 units.</li> <li>• The west side of the Redondo Beach Transit Center. Maximum legal density should be allowed on all parcels within a half-mile of station.</li> </ul> <p>3. The City plans to reduce the amount of development in areas where housing “pencils out”. Claims the City violates “no net loss” requirements.</p> <ul style="list-style-type: none"> <li>• The South Bay Galleria should allow for more residential. The City’s up zoning of surrounding parcels is not feasible as those landowners have shown no interest in building housing.</li> <li>• Pacific Coast Highway. The City has banned new mixed-use development along PCH and moving housing a mile to the north.</li> <li>• Artesia Boulevard. The City proposes to ban new apartment buildings along Artesia. To replace this capacity, City plans to redevelop two commercial plots along 190<sup>th</sup>, at Mary Anne and Meyer.</li> </ul> <p>The City’s approach to updating the housing element does not affirmatively further fair housing and reverse existing patterns of residential segregation. The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.</p> <p>The City should commit to major constraint removal policies in order to encourage strong housing growth at all levels of income including:</p> <ul style="list-style-type: none"> <li>• Legalize apartments on all residentially zoned parcels including R-1.</li> <li>• Significantly up zone parcels near transit, job centers, schools, and parks.</li> <li>• Legalize by-right residential and mixed-use development on commercially zoned parcels.</li> <li>• Pre-approval of standard ADUs.</li> <li>• Introduce density bonus program near mass transit.</li> <li>• Establish small lot subdivision program similar to City of LA.</li> <li>• Establish a fast-ministerial review process to approve new multifamily buildings.</li> <li>• Citywide elimination of on-site minimum parking mandates.</li> <li>• More flexibility on height, floor-area ratio, and lot coverage.</li> </ul>	<p>locations in proximity to many of these developed sites.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The Housing Programs identified in the draft housing element specifically target the assessment and, if necessary, removal of governmental constraints concerning housing. Additionally, as proposed, the housing sites with the highest potential residential capacity are all within close proximity to existing and proposed transit centers. Recent changes in State housing laws, Senate Bill (SB) 9, allow for the subdivision of R-1/small lots.</p>
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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.  Claims past city governments have catered to special developer interests, resulting in inadequate yards/setbacks on residential lots and no space for beneficial trees and plants to capture carbon and water, beautify neighborhoods, provide oxygen, and cool the atmosphere.  Require ample green space, parkland, and trees with every residential building permit.	The Draft Housing Element is required to comply with State housing laws. An ongoing review process is underway with the State's Department of Housing and Community Development to ensure the City's housing element is ultimately compliant with applicable State housing laws.  The issue of "greening up" will be addressed as part of the ongoing updates to the City's Land Use and Open Space and Conservation, and Parks and Recreation Elements of the General Plan.

		Supports a proposed development on Catalina Avenue between Diamond and Emerald Streets that preserves the café and adds a bakery. Notes that the development is also overcrowded. Suggests additional development standards including planting native plant species for this proposed development. Offered South Bay Parkland Conservancy as a resource.	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.
07.26.2021	Nancy Skiba, Resident	"Affordable housing for 90277 and 90278 should be equally planned."	The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.
08.06.2021	Mark Nelson	Commented on the City's associated environmental document for the HE update.	The City formally responded to these comments on the associated environmental document and they were included in the final environmental document.
08.23.2021	Laura Emdee, Resident (Council Person)	"If the Housing Element has been sent to HCD, what are the purpose of the comments? Where will they go and to what purpose?"	In HCD's continued discussions with City as well as in their correspondence dated September 2, 2021, HCD has emphasized Government Code Section 65583, which requires local governments to make a diligent effort to achieve public participation from all economic segments of the community in the development of the City's

			<p>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.”</p> <p>All comments should be addressed to the City for further consideration as the City continues to confirm the housing element complies with State laws as they pertain to this matter.</p>
08.24.2021	Natalie Bennion, Resident	<p>“North Redondo Beach is already doing it’s share to accommodate more housing. Please zone 1,245 units in the 90277 part of town. There is availability in areas such as the 50-acre power plant site.”</p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
08.25.2021	Leonid Pustilnikov, Property Owner	<p>Claims the City of Redondo Beach has spent the last generation fighting development. Cites the Legado Project development review process in support of claim.</p> <ul style="list-style-type: none"> <li>• Originally planned for 180 units, was approved for 115 units.</li> <li>• Still awaiting permits more than a decade later.</li> </ul>	<p>Permits have been issued for the Legado Project.</p> <p>Concerning the comments regarding the probability of residential development</p>

		<p>Notes surprise that Redondo completed 40% (559 of 1,397) of its required 5<sup>th</sup> Cycle.</p> <p>In order to meet 6<sup>th</sup> Cycle goal commenter recommends the City be proactive and update its zoning throughout the City. Notes that City’s proposed solution puts 49% of housing at the city’s edge. Claims all housing overlay sites are adjacent to other, less affluent jurisdictions. Claims probability of any units in the proposed housing overlay areas is “extremely low” and cites the following claims in support of assertion:</p> <ul style="list-style-type: none"> <li>• North Tech site. <ul style="list-style-type: none"> <li>○ A business in Redondo Beach since 1985 has no intentions of relocating or shutting down.</li> <li>○ A grocery anchored shopping center with 100% occupancy (17 tenants) has no plans of selling or repositioning the property.</li> <li>○ A national plumbing fixture showroom located at site for years.</li> <li>○ Any residential development would pose a serious adverse health impacts on its residents.</li> </ul> </li> <li>• South Transit Center site. <ul style="list-style-type: none"> <li>○ Property recently purchased in 2019 and as currently planned does not include housing.</li> </ul> </li> <li>• South Bay Galleria site. <ul style="list-style-type: none"> <li>○ Sought entitlements for 650 units and was approved for on 300 units.</li> <li>○ Claims that due to “covid pandemic” significant changes to the project are likely and will take years to resolve.</li> </ul> </li> </ul> <p>Claims Redondo Beach is not “serious about housing” as evidenced by residential overlays instead of rezoning sites exclusively for residential. Cites the reason for residential overlays is to avoid “vocal protest” from property owners.</p> <p>Comments that currently proposed housing sites create the illusion of housing and ignores changes to most of the city. More suitable solutions in and around affluent parts of the city were not considered.</p>	<p>potential of the recommended housing sites, during the 6<sup>th</sup> cycle, the following is provided:</p> <p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>South Transit Center site – City staff continues to investigate this site and has engaged the property owner(s) to confirm and, in this case, reconfirm support for the identification of the 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</p>
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		<p>Cited appropriate alternative locations for exclusively residential or mixed-use development that are adjacent to parks, bike paths, beaches and harbors and developments ranging from 17.5 to 120 units per acre but not considered:</p> <ul style="list-style-type: none"> <li>• 1-acre site at 1021 N. Harbor.</li> <li>• 50-acre power plant at 1100 N. Harbor.</li> </ul> <p>Notes Planning Commission’s recommendation for 50% of power plant site be zoned at 30 dwelling units per acre. Notes City Council chose other areas for housing and ignored power plant site that commenter claims are not suitable sites that will never be developed.</p> <p>Notes as the property owner of 1021 N. Harbor and 1100 N. Harbor that he has studies and reports confirming housing could be built on the site within the 6<sup>th</sup> cycle, is eager to build housing, and is currently cleaning and remediating 1100 N. Harbor in anticipation of its closure on or before December 31, 2023. Claims that the City deemed 1021 and 1100 N. Harbor unsuitable because “the city knew it would mean real housing units”.</p> <p>Strongly urges HCD to reject the housing element as drafted. Requests that the city obtain commitments from property owners of the designated housing sites demonstrating their commitment, support, and willingness to pursue residential development. Comments that city should be fairer to its electorate and spread development throughout the city and that housing is better suited nearer to parks and space rather than freeways and industrial centers.</p>	<p>construction and the future planned Metro station.</p> <p>To date staff has confirmed interest from many of the property owners of the recommended housing sites for the application of a high-density Residential Overlay designation on their properties. Additionally, none of the property owners of the sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties.</p> <p>Staff does not anticipate that HCD will not accept any of the proposed housing sites.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, 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.</p>
08.26.2021	Melissa K. Dagodag, Attorney representing a North Redondo	<p>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.</p>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including the 50-acre Power Plant site. After carefully</p>

	Beach resident (Golden Hills neighborhood)		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.
08.30.2021	CalTrans	Commented on the City's associated environmental document for the HE update.	The City formally responded to these comments on the associated environmental document and they were included in the final environmental document.
08.31.2021	Sheila Lamb, resident (GPAC Member)	<p>General: Requests that new additions to housing element be identified.</p> <p>Comments on the following Sections requesting clarifications, some additional information, edits in language, and challenging various conclusions and claims that the cited information is incorrect within the document:</p> <ul style="list-style-type: none"> <li>• Section 2.2.1 Introduction (Page 1).</li> <li>• Section 2.2.1C Public Participation (Page 2).</li> <li>• Section 2.2.2D Homeless Resources (Page 22).</li> <li>• Section 2.2.2E Table H22 Single family attached units (Page 24).</li> <li>• Section 2.2.3A Constraints on Housing Production-Government Constraints (Page 34).</li> <li>• Section 2.2.3A4 Tables H35-36 Provision for a Variety of Housing Types (Pages 41-42).</li> <li>• Section 2.2.3A4 Provision for a Variety of Housing Types-Zoning and Land Use (Pages 46-47).</li> <li>• Section 2.2.3A4 Provision for a Variety of Housing Types-Senior Housing (Page 48).</li> <li>• Section 2.2.3A4 Provision for a Variety of Housing Types-Emergency Shelters, Transitional Housing, Supportive Housing, SRO's (Page 48).</li> <li>• Section 2.2.3B5 Liquefaction (Page 61).</li> <li>• Section 2.2.3B Flooding (Page 61-64).</li> <li>• Fig. H2/H3 Sites Inventory (Pages 75-76).</li> <li>• Appendix C Public Participation (Page C-1).</li> <li>• Add Appendix-List of legislation mentioned in the text.</li> <li>• Add Appendix-List of zoning amendments in the text.</li> </ul>	At their meeting on September 16, 2021, the City's Planning Commission carefully considered these comments, in addition to many other comments, and determined that some should be addressed as revisions/edits to the proposed draft housing element. For example, figures (bar charts) were added to the draft housing element which illustrate the City's unique housing mix, with more percentage of residential land area designated as multi-family zoning rather than single-family zoning, in comparison to surrounding jurisdictions and the SCAG region overall.



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

			<p>the addition of the recommended housing sites in the northern area of the City, the city's overall highest residential density remains within the southern area of the City.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
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,	Strongly urges the City Council and Planning Commission to reject the 2021-2029 Housing Element. Cites severe lack of water. City should implement	The actual changes in land use designations to accommodate the recommended housing

	Resident	<p>system similar to City of Cambria, which does not allow additional housing without additional water. Recommends “growth management” ordinance.</p> <p>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.</p> <p>Commenter cites NASA and IPCC concerning impacts of climate change in the future and its furtherance of water shortage for City.</p> <p>Comments on uncertainty of future supplies from State Water Project and the Colorado River Aqueduct which supply nearly 50% of water purveyors sources.</p> <p>Commenter further specified water resource details concerning State Water Project and Colorado River water supplies and cites the crises facing both of these sources.</p> <p>Provides additional comments and sources concerning climate change, Sierra Nevada snowpack issues, and other water resources shortages, and concludes that because of all data the commenter cites, it seems unlikely that current and certainly future water needs can be met, and therefor the City should reject the plan.</p>	<p>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 resources and impacts of climate change and mitigation as necessary will be identified.</p>
09.03.2021	Chris Ahearn, Resident - Homeowner	<p>Comments that it is very difficult to see the maps of the draft plan. City emailed copies but the quality was similarly poor. Because of the poor-quality plan commenter does not feel he has enough information to comment. Document does not specifically answer how this plan will affect current homeowners and it should.</p>	<p>The commenter is invited to visit City Hall to meet and confer in person. Plans can be enlarged and provided as necessary.</p>
09.03.2021	Peter Aziz, Resident	<p>Comments that the housing needs to be equally distributed throughout all of Redondo Beach, not just one or two of the densest districts. Comments that public input was ignored. Disagrees with location of housing near the freeway, citing poor air quality and poor quality of life.</p>	<p>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</p>

		<p>Included multiple links to articles concerning poor air quality and negative health affects for residents of housing near freeways.</p> <p>Requests that the housing near the freeway be removed from the plan and distributed equally throughout the City.</p>	<p>proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city's overall highest residential density remains within the southern area of the City.</p> <p>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.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public</p>
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			meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.
09.03.2021	Alisa Beeli, Resident	<p>Strongly urges the City to reject the Housing Element plan and cites the following in support:</p> <ul style="list-style-type: none"> <li>• Nearly 94% of required units in the North/90278 zip code</li> <li>• Places nearly all new zones (residential high density overlays) on edges of City</li> <li>• All overlay zones are adjacent to less affluent areas of the City</li> <li>• North Tech district property owner have no plans to relocate existing commercial tenants and its location adjacent to 405 Freeway is a serious health risk</li> <li>• Alternative options for housing were not considered, 1021 and 1100 North Harbor Drive, and should be as they are next to parks, bike paths, the beach and Planning Commission recommended the 1100 North Harbor Drive location.</li> <li>• Based on only developing 40% of 5<sup>th</sup> Cycle RHNA housing, developing 2,490 is unlikely without updating zoning throughout the City.</li> </ul> <p>Placing majority of new housing in North Redondo/90278 near freeways and industrial areas is not realistic or equitable. Cites concerns with traffic and overcrowding of schools in North Redondo.</p> <p>Concerned that hundreds of public comments were ignored and housing should be better distributed throughout the entire City.</p>	<p>The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city’s overall highest residential density remains within the southern area of the City.</p> <p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>Any future redevelopment of high density residential within the any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of</p>

			<p>a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including 1021 and 1100 North Harbor Drive sites. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p>
09.03.2021	Mariam P. Butler, Resident	Requests that housing/low income housing be evenly distributed throughout the City to minimize impacts to one district. D4 is already very dense and cannot accept the majority of housing. Impacts on schools and resources need to be considered.	The City's existing residential density in the southern part of the City is the densest. Proposed "housing sites" for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and proximity to existing and future transit locations. It is noteworthy that even with



			<p>the addition of the recommended housing sites in the northern area of the City, the city's overall highest residential density remains within the southern area of the City.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>Any future redevelopment of high density residential within the any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental 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</p>
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			determined through the associated environmental analysis will be applied.
09.03.2021	Tieira	<p>Comments that the City must build more affordable housing in all Redondo Beach neighborhoods. All deserve safe, clean and affordable housing. Comments on Segregation and negative impacts on lower-income and black populations.</p> <p>Comments that not providing affordable housing has negative impacts. Notes that LA County residents have been requesting more affordable housing for 10 years.</p> <p>Comments that poverty is a failed policy and that we must build more housing in all communities in Redondo Beach, especially in single family zones.</p>	<p>The City is currently investigating the development of an “inclusionary housing” ordinance that could serve to further the City’s intentions to build more affordable housing throughout the City at locations in addition to the recommended housing sites in the draft housing element. The City’s development of an “inclusionary housing” ordinance is outlined in Program 3 of the draft housing element.</p> <p>Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p> <p>Recent changes in State housing laws, Senate Bill (SB) 9, allow for the subdivision of R-1/small lots.</p>
09.03.2021	Marianne Teola, Resident	Comments on the thoroughness and significant research went into the document. Expressed disappointment with short notice for providing comments, received email day before comments due. Suggests that a summary of the main points of the Housing Element be attached to the	Due to the length of time that it took the State (HCD) and the Southern California Association of Governments (SCAGs) (and its member jurisdictions including the City of

		<p>element. Asks the question, how will the City be impacted by the recommendations in the element?</p> <p>Comments on the difference between a single-family residence in District 1 vs. District 3. Questions the allowance of “third floors” in single family residences. Requests that a zoom meeting with the average citizen be scheduled to discuss the plan. Asks questions about the Beach Cities Health District.</p>	<p>Redondo Beach) to complete the 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) process, inclusive of the appeal process, coupled with the State’s 60 day review period and deadline for adoption of the City’s housing element, October 15, 2021, the schedule for engaging the public was severely compressed. The City plans to continue the public engagement process through and beyond the adoption process to ensure compliance with State law on this matter.</p> <p>The “Administrative Reports” for both the September 16, 2021 Planning Commission public hearing as well as the City Council’s October 5, 2021 public hearing includes comprehensive summaries of the housing element and are linked to the City’s PLANredondo webpage.</p> <p>The City’s public hearings are accessible to all interested parties and opportunities for questions and comments were afforded to the public during said meetings. Additional future meetings on the housing element will be advertised and open to the public.</p> <p>Any concerns with zoning development standards, “third floors” can be 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</p>
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			upcoming meetings of the GPAC are on the City's PLANredondo webpage.
09.13.2021	Mark Nelson, Resident – BCHD Volunteer	Comments on "Planning Commission Resolution No. 2021-**-PCR-**" citing an inaccuracy regarding outreach. Provides additional comments on the BCHD entity, their proposed project and their project review process to date.	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City. After carefully considering the public's input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The Beach City's Health District (BCHD's) planned project will require entitlements to be issued by the City prior to its development at which time additional analysis and reviews will be conducted by the City including taking public testimony/input/questions.</p>
09.13.2021	Mike Martin	Comments on the Land Use Category Descriptions for Public/Institutional (PI), Public/Utility (U), and Parks and Open Space (OS) descriptions.	Any concerns with Land Use Category Descriptions and standards concerning 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,	Commenter provides multiple statistics concerning Black and Latino housing issues and attributes the effects to "decades of racist policies" that still	The City's Affirmative Furthering Fair Housing (AFFH) appendix of the City's draft

<p>Steering Committee Members</p>	<p>remain. Cites restrictive covenants, exclusionary zoning, redlining, the California Constitution’s Article 34 and local “crime-free housing” policies as contributing towards racial divisions.</p> <p>Commenter presents disproportionate statistics concerning COVID and cites overcrowding in Black and Latino neighborhoods as reasons for higher infection/death rates.</p> <p>Commenter cites that LA County ranks last in the US in terms of housing affordability, overcrowding, and homelessness. States that lower-income Black, Latino and AAPI families are being pushed out of their homes/communities at alarming rate.</p> <p>Cites that LA County is only expected to build 7% of required housing by 2030 and shortfall will impact Black and Latino families disproportionately.</p> <p>Commenter notes making every neighborhood resource-rich will create better housing future. Housing Element must consider intersection between housing, public health, and environmental justice. Cites a number of statistics concerning low-income people of color bearing brunt of negative impacts of poor air and soil qualities.</p> <p>Commenter doesn’t believe the draft housing element provides equity and affordability and wishes to meet to discuss the following:</p> <p><u>Protections</u></p> <ul style="list-style-type: none"> <li>• Expand just-cause eviction protections.</li> <li>• Implement local RSO or strengthen/reduce the annual allowable rent increases.</li> <li>• Codify tenant’s right to council for evictions.</li> <li>• Strengthen tenant education programs.</li> <li>• Create tenant anti-harassment ordinance.</li> </ul> <p><u>Preservation</u></p> <ul style="list-style-type: none"> <li>• Prioritize rezoning in high-resource neighborhoods which are transit- and job-rich, including single-family zones.</li> </ul>	<p>housing element includes the following components pursuant to Assembly Bill (AB) 686:</p> <ul style="list-style-type: none"> <li>• Summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity;</li> <li>• Analysis of segregation patterns and disparities in access to opportunities;</li> <li>• Assessment of contributing factors; and</li> <li>• Identification of fair housing goals and actions.</li> </ul> <p>As confirmed in the AFFH appendix, all of the City’s neighborhoods are determined to be “high resource areas” which supports the good health of future neighborhood populations as affordability and integration is realized as a result of the implementation of the City’s housing element with the recommended land uses and housing programs.</p> <p>City staff and the City’s housing consultant plan to initiate meeting(s) to confirm with the Our Future LA Steering Committee Members (commenter).</p> <p><u>Protections:</u> The City of Redondo Beach contracts with the Housing Rights Center (HRC) for fair housing services. The Housing Rights Center investigates and resolves discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the</p>
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	<ul style="list-style-type: none"> <li>• Exclude parcels containing RSO housing units in site inventory.</li> <li>• No net loss provisions should apply to site inventory parcels and include rezoning program with monitoring/implementation.</li> <li>• Institute local program and funding sources for preservation of existing affordable housing.</li> </ul> <p><u>Prioritization of affordable housing</u></p> <ul style="list-style-type: none"> <li>• Include inclusionary zoning to locally fund/incentivize affordable housing.</li> <li>• Prioritize creation of affordable housing on public land.</li> <li>• Streamline affordable housing production.</li> <li>• Include programs for 100% affordable housing zoning overlays and apply to high-opportunity and R1 areas.</li> </ul> <p><u>Site Capacity Assessment</u></p> <ul style="list-style-type: none"> <li>• Report the realistic capacity vs. estimated realistic capacity for both vacant and nonvacant sites.</li> <li>• Commenter estimates draft housing element will fall short of RHNA by 2,575 units of realistic capacity.</li> <li>• Report proportion of sites from previous housing element’s inventory that were developed during the previous planning period and utilize HCD recommended methodologies/data sources/factors for realistic development capacity.</li> <li>• Survey owners of nonvacant housing sites to determine likelihood of being discontinued during the planning period.</li> <li>• A buffer of 15-30% capacity should be included in sites inventory.</li> <li>• Provide quantitative estimate of in-pipeline projects likely to be completed based on historical data and adjust accordingly.</li> <li>• Commit to mid-cycle review.</li> </ul> <p><u>Affirmatively Furthering Fair Housing</u></p> <ul style="list-style-type: none"> <li>• Increase the concentration of lower-income households in areas where concentrations are low.</li> <li>• Reduce the concentration of lower-income households in areas with significant exposure to noise/pollution.</li> <li>• Ensure community-serving investment in historically disinvested areas to gain affordable housing/stop displacement, while prioritizing</li> </ul>	<p>dissemination of fair housing information such as written material, workshops, and seminars.</p> <p>They also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. Additional measures per the commenter are under further consideration by the City.</p> <p><u>Preservation:</u> The City has instituted all suggested measures of preservation with the exception of the development of a local program and funding sources for preservation of existing affordable housing. The City is further considering adding this measure to the existing “program” to address this matter.</p> <p>The City has incorporated some of the commenters suggested measures regarding Prioritization, Site Capacity Assessment, and Affirmative Furthering Fair Housing, and intends to further consider additional noted measures in future meeting(s) with this organization. Concerning “<u>Prioritization</u>” the City is currently investigating the development of a Citywide inclusionary housing ordinance. Concerning “<u>Site Capacity Assessment</u>” the City is conducting</p>
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		<p>environmental justice, community health, and strengthen equitable community leadership in planning.</p> <ul style="list-style-type: none"> <li>• Analyze local patterns in socioeconomic/racial segregation and integration.</li> <li>• Prioritize high-opportunity census tracts and well-resourced areas when selecting sites for lower-income housing.</li> <li>• Identify funding sources/public resources/density bonus programs to maximize likelihood of below market rate units are built.</li> <li>• Solicit public feedback/commentary on housing element reflecting City's socioeconomic makeup.</li> <li>• Utilize HCD recommended safe harbor methodology for forecasting future ADU development.</li> <li>• Provide mid-cycle adjustments in inventory sites/ADU development is less than projected. Mid-cycle adjustments should automatically implement by-right density bonus large enough to make up for ADU shortfall.</li> <li>• Use city-specific data (instead of regional) for assessing projected affordability of ADUs.</li> </ul>	<p>surveys with the property owners of the recommended housing sites. Concerning "<u>Affirmative Furthering Fair Housing</u>" since all of the City's neighborhoods are qualified as "high resource", all future affordable housing will benefit within Redondo Beach.</p>
09.15.2021	Abundant Housing LA/YIMBY Law	<p>Commenter supports more housing at all levels of affordability and reforms to land use and zoning to improve affordability, access to jobs/transit, environmental sustainability, and racial/economic equity.</p> <p>Commenter cites and summarizes their earlier letter dated May 20, 2021. Noted inconsistencies of draft housing element with state housing element law and AFFH, and HCD's instructions for housing element design and implementation. Also referenced their October 2020 communication sharing their "best practices" for housing element updates.</p> <p>Commenter cites HCD's September 2, 2021 letter identifying, "revisions will be necessary to comply with State Housing Element Law".</p> <p>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</p>	<p>The City also supports more housing at all levels of affordability as described and programed in the draft housing element.</p> <p>HCD's September 2, 2021 letter has requested additional information concerning the North Tech District housing site and the contiguous small lot sites located along 190<sup>th</sup> and one small lot site on Pacific Coast Hwy. City staff continues to investigate these housing sites and has engaged property owners to confirm and, in some cases, 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</p>

		<p>recommendations. The following is a summary list of AHLA/YIMBY’s policy recommendations:</p> <ul style="list-style-type: none"> <li>• Rezone parcels located near transit, job centers, schools, and parks to expand housing supply in high- and highest-resource areas, including R1 parcels.</li> <li>• Reduce concentration of lower-income households in neighborhoods with high concentrations of low/moderate income households or with high pollution.</li> <li>• Identify new funding sources/public resources for production/preservations of affordable housing including real estate transfer tax, congestion pricing, local density bonus, and abatement of polluting infrastructure.</li> <li>• Exempt parcels containing affordable housing to prevent displacement of vulnerable households.</li> <li>• Annually monitor “no net loss” and include rezoning implementation program.</li> <li>• Include offering publicly-owned land at no cost to nonprofit affordable housing developers as a state density bonus law concession.</li> <li>• Create 100% affordable housing zoning overlay for high-opportunity neighborhoods including R-1.</li> <li>• Provide quantitative estimate of site’s realistic capacity. Commenter references “Survey Method” or “Historical Redevelopment Rate Method”.</li> <li>• Report sites developed during prior planning period.</li> <li>• Share interest letters with planned development descriptions from owners of site inventory parcels.</li> <li>• If City lacks enough suitable sites to achieve RHNA, don’t add more theoretical units to existing sites, rezone additional parcels.</li> <li>• Commit to mid-cycle review to verify assumptions and adjust if necessary.</li> <li>• Provide quantitative estimate of “in-pipeline projects” and adjust if necessary.</li> <li>• Create local density bonus program that also applies to low-density parcels.</li> </ul>	<p>largest shopping center in the North Tech District for the future additional development of high density residential at this location. Additionally, none of the property owners of the small sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties. Staff is continuing to investigate these sites. Staff does not anticipate that HCD will not accept the proposed housing sites based upon the overwhelming interest by property owners for potential high density residential on the determined housing sites per the draft housing element.</p> <p>The City has incorporated or plans to incorporate some of the many policy recommendations cited by the commenter including: The sharing of interest letters for future development from owners of housing sites; Updating the existing Residential Design Guidelines with objective design standards to further “expand and speed up the ministerial review process” (Program 14); Amendments to the City’s zoning ordinance consistent with State housing laws that serve to reduce/mitigate potential governmental constraints to housing production and affordability (Program 13); and The development of ADU guidelines that will be included within the City’s updated Residential Design Guidelines (Program 12).</p>
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		<ul style="list-style-type: none"> <li>• Pre-approve standard ADU's, small-scale multifamily and small lot subdivision housing plans.</li> <li>• Expand and speed up ministerial review process.</li> <li>• Eliminate on-site parking requirements.</li> <li>• Reduce restrictions on development standards.</li> <li>• Reduce fees on multi-family residential development.</li> <li>• Survey/poll online and hardcopy formats in top languages spoken in community regarding preferences/priorities for zoning and residential development.</li> </ul>	<p>The following is a list of additionally proposed "programs" within the draft housing element that address and are consistent with the intentions of many of the policy recommendations from the commenter:</p> <p>Program 1: Mobility Access/Emergency Repair Program;  Program 2: Preservation of Affordable Housing;  Program 3: Inclusionary Housing;  Program 4: Housing Choice Voucher (Section 8) Program;  Program 5: Response to Homelessness;  Program 6: Affordable Housing Development;  Program 7: Green Task Force;  Program 8: Residential Sites Inventory and Monitoring of No Net Loss;  Program 9: By-Right Approval for Projects with 20 Percent Affordable Units;  Program 10: Replacement Housing; and  Program 11: Small Lot Development/Lot Consolidation.</p>
09.15.2021	Wally Marks, Property owner: 2810-2860 Artesia Boulevard	<p>Commenter supports the Housing Element document identifying ways in which the housing needs of existing and future populations can be met and its focus on improving affordable housing, finding more affordable housing and removing constraints.</p> <p>Comments on need for updating zoning and adopting an inclusionary housing ordinance.</p>	<p>As noted by the commenter, the City's draft housing element promotes and furthers the identification of ways in which the housing needs of existing and future populations can be met and focuses on improving affordable housing, finding more affordable housing, and removing constraints.</p>

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

		<p>3. North Tech is estimated to accommodate 28%of the required units. Questions whether the current property owners plan to relocate? Questions health impacts from freeway for residential at this site. Also claims it is a 45-minute commute to high school.</p> <p>4. City Council ignored the Planning Commission’s recommendation for 50% of power plant site to be zoned at 30 units per acre and hundreds of public emails and statements asking to consider sites within 90277.</p> <p>5. Redondo Beach completed 40% of its 5<sup>th</sup> Cycle RHNA. Commenter doesn’t think the City will meet its requirement for 2,490 units as currently planned.</p> <p>Asks the City to work toward a more equitable distribution of the housing units throughout the entire City.</p>	<p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>Any future redevelopment of high density residential within the any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designation, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p> <p>The General Plan Advisory Committee (GPAC), Planning Commission, and City</p>
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			<p>Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including the power plant site. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The City is not required to build the housing but rather to ensure there is capacity with the correct high-density residential zoning to accommodate the required housing at the required income levels.</p>
09.17.2021	Mary Schurr, Resident	<p>Commenter expresses that the best place for high density housing is the 50-acre Power Plant site. Cites that 500 persons expressed this sentiment as part of the City’s Social Pin Point land use plan survey.</p> <p>Supports the development of housing at 1021 and 1100 N. Harbor Drive and cites the property owners’ letter. Also cites the Planning Commission’s recommendation for housing at the 50-acre site.</p> <p>Cites percentage of housing developed during 5<sup>th</sup> Cycle as 40%. Doesn’t believe the City will meet 6<sup>th</sup> Cycle requirement for 2,490 units.</p> <p>Cites City’s solution is to place housing on fringes of City. All housing sites are adjacent to other “less affluent jurisdictions”.</p> <p>Cites list of reasons why many of the identified housing sites are not likely to be developed:  <u>North Tech Site</u></p> <ul style="list-style-type: none"> <li>Existing development not likely to shut down/relocate.</li> </ul>	<p>The General Plan Advisory Committee (GPAC), Planning Commission, and City Council conducted multiple public meetings over many months concerning housing sites at locations throughout the City, including 1021 and 1100 North Harbor Drive sites. After carefully considering the public’s input and the hundreds of comments/requests received, the City Council at their public meeting on June 15, 2021 approved the housing sites as identified within the draft housing element.</p> <p>The City’s existing residential density in the southern part of the City is the densest. Proposed “housing sites” for potential future high density residential were not necessarily based on existing density but rather on multiple State criteria and</p>



		<ul style="list-style-type: none"> <li>• If any residential is developed they will have a 45-minute commute to Redondo Union High School.</li> <li>• Would not be near any amenities.</li> </ul> <p><u>South Transit Site</u></p> <ul style="list-style-type: none"> <li>• Cites property owner is working on a project that does not include residential.</li> </ul> <p><u>South Bay Galleria</u></p> <ul style="list-style-type: none"> <li>• Should have more residential. There is an EIR for 650 units.</li> </ul> <p>Cites that City is losing its small-town charm. Development is out of control. Parking in the streets is severely impacting neighborhoods. Increased traffic on Artesia Blvd is not safe. North Redondo is overdeveloped now. Does not support more housing in North Redondo.</p> <p>Don't allow zoning on unlikely properties while ignoring large parcels next to the beach/bike paths/parks.</p>	<p>proximity to existing and future transit locations. It is noteworthy that even with the addition of the recommended housing sites in the northern area of the City, the city's overall highest residential density remains within the southern area of the City.</p> <p>North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.</p> <p>South Transit Center site – City staff continues to investigate this site and has engaged the property owner(s) to confirm and, in this case, reconfirm support for the identification of the subject property as potential sites for 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</p>
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			<p>density residential, citing the sites close proximity to the City’s Transit Center under construction and the future planned Metro station.</p> <p>To date staff has confirmed interest from many of the property owners of the recommended housing sites for the application of a high-density Residential Overlay designation on their properties. Additionally, none of the property owners of the sites that city staff has been able to engage to date are opposed to the Residential Overlay designation on their properties.</p> <p>Staff does not anticipate that HCD will not accept any of the proposed housing sites.</p>
09.22.2021	Robert Doran, Director of Development & Construction, Redondo Beach Plaza (North Tech District – Housing Site)	<p>Commenter (property owner of Redondo Beach Plaza-North Tech District Site) supports the identification of the Redondo Beach Plaza as a “housing site”. See email comment below.</p> <p>“ROIC would welcome the opportunity to introduce High Density Residential to our Redondo Beach Plaza. I have attached some examples of other properties we own where we have recently completed or are in the process of entitling/permitting densification efforts which includes residential components.”</p>	North Tech site – The property owner of the largest shopping center in the North Tech District has expressed enthusiastic support for the allowance of high density residential on their property while maintaining their existing commercial center. Additionally, the property owner has recent experience with introducing high density residential within existing older shopping centers that retain existing commercial and are located in close proximity to freeways.
10.04.2021	James Light, Resident (GPAC Member – Comments	<p>Commenter raised concerns with the adequacy of the environmental documents in support of the Housing Element. Commenter claims that the negative declaration relies on two (2) flawed/inaccurate conclusions:</p> <ol style="list-style-type: none"> <li>1. That the Housing Element is only a policy document and therefore does not require CEQA analysis.</li> </ol>	The 2021-2029 Housing Element provides a framework for the City to identify opportunities to increase the housing stock within the City to accommodate the City’s RHNA allocation. The document identifies

<p>on the proposed Housing Element CEQA document – The Initial Study/ Negative Declaration was available for public review for 30 days beginning August 5, 2021 and ending September 3, 2021)</p>	<p>2. That the Housing Element does not create changes that impact certain analysis elements and that any analyses would be accomplished in conjunction with each future specific project.</p> <p>States that even policy documents are subject to CEQA.</p> <p>Commenter supports deferring the analysis to the EIR to conducted for the General Plan update. Requests that the ISND be modified to remove “flawed/inaccurate” conclusions that policy documents are not subject to CEQA analysis.</p> <p>States that the ISND intends to defer CEQA analysis to individual projects to avoid analysis of land use changes made by the City. Commenter states concerns that City is avoiding a required CEQA analysis of impacts and will use same argument concerning the upcoming CEQA analysis for the General Plan changes. States land use changes are a discretionary act by the City that can drive environmental impacts. Deferring to specific future projects would avoid the foreseeable cumulative impacts of all proposed zoning land use changes. CEQA intends that the public understand potential impacts of changes when proposed by the City. The IS/ND should be revised wherever this inaccurate conclusion is used.</p> <p>City Council should reject the IS/ND document as written and rewritten to reflect the housing element recommended zoning/land use changes will be analyzed as part of the PlanRedondo General Plan update process.</p> <p>Commenter appended his comments above with an example of case law, “City of Redlands v. County of San Bernardino (2002) 96 Cal.App.4<sup>th</sup> 398, at p. 409” which held that CEQA applies to revisions or amendments to an agency’s general plan...</p> <p>Stated that the negative declaration is wrong. The City cannot waive off CEQA analysis by stating the document is just a “policy document” or by deferring</p>	<p>strategies and programs to conserve and improve existing affordable housing; provide adequate housing sites; assist in the development of affordable housing; remove governmental and other constraints to housing development; and promote equal housing opportunities in a strategic manner. The City clearly agrees that CEQA analysis is necessary for the Housing Element and therefore, prepared the Negative Declaration. As such, the Housing Element is a policy document, and did require a CEQA analysis which was done.</p> <p>As indicated in the Negative Declaration, the land use designations and zoning amendments necessary to fully implement the Housing Element are not being considered at this time and will be considered and evaluated as part of the PLANRedondo process. The EIR that will be prepared for PLANRedondo will evaluate the potential environmental impacts that could occur from full buildout of the Plan. The City is not deferring the analysis but will consider all the necessary General Plan and Zoning amendments associated with the Preferred Land Use Plan that was approved by Council in May 2021. The amendments necessary to fully implement the Housing Element are a subset of the amendments that will be considered as part of PLANRedondo. The timing for the adoption of the Housing Element, which was separated from the</p>	
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		to a future specific project. The negative declaration should be rejected and the CEQA analysis rolled in with the PlanRedondo General Plan Amendment.	PLANRedondo, is to meet the October 15 deadline that is imposed by the State. The Housing Element stipulates that the City must complete the land use and zoning amendments by November 2023, either as part of or regardless of the adoption of PLANRedondo to ensure consistency between the 2021 Housing Element and the General Plan at that time.
10.04.2021	Warren Chun, Resident	21-year resident.  Requests the Mayor and City Council consider a balanced approach in the placement of affordable housing locations between South Redondo and North Redondo.	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.
10.04.2021	Guernsey, Resident	30+ year resident.  Redondo Beach is one city. Commenter states that it makes sense to add new homeless units near El Nido neighborhood but next ones, if any, should go in South Redondo. Also fine with new 30+ new units near edge of commenter's "R1" neighborhood and with Friendship Foundation planned next to Franklin Park. Commenter objects to "unfair amount of new housing to go into "North Redondo". Requests City do what's right overall for "our ONE city".	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.

10.05.2021	Grace Peng, PhD, Resident	<p>Commenter frustrated with City's 6<sup>th</sup> Cycle 2021-2029 Draft Housing Element. States it does not meet City's needs nor meet intent of Federal law for Affirmatively Furthering Fair Housing (AFFH).</p> <p>Housing Element should consider Jobs-Housing fit to not increase traffic.</p> <p>Comments on North Redondo being a tech center generating large numbers of jobs and attracting two-tech worker families that value short commutes to work and school, and coastal South Redondo being a beach community attracting tourists, retirees, and singles and inland South Redondo attracting families. South Redondo is a generator of low-income jobs. Comments that City needs to add housing in proximity of the service's essential workers.</p> <p>Comments on eldercare workforce issues.</p> <p>States that the current HE puts almost all the low-income housing at the extreme Northeast corner of the City. States the City will be providing homes for low-income workers of other Cities not Redondo Beach.</p> <p>Comments that North Redondo parents are frustrated by over-crowded schools. States there is less school crowding in South Redondo and more family homes should be built there.</p> <p>Comments that the draft element puts all the very low-income housing in the most polluted area of the City. Cites distances, noise, air pollution will stress children on way to school. Not AFFH.</p> <p>States that HE would put all low-income children in Adams MS which has twice as many as Parras MS. States that the additional low-income students into existing schools with higher proportions of low-income students is not compliant with AFFH.</p> <p>States most segregated schools are in South Redondo and are the least crowded requiring those schools to attract students outside their area, which</p>	<p>Regarding the commenter's concerns with Redondo Beach's Jobs-Housing ratio the following is presented.</p> <p>In support of the City's ongoing General Plan Update the City commissioned a comprehensive and robust "Demographic and Economic Trends Analysis". Included within this analysis was detailed data concerning the City's employment and labor trends. The analysis highlighted the comparison of resident employment and available jobs in Redondo Beach and quantified the mismatch between residents' professions and the opportunity to find employment within that profession within the City. The most significant commuter flow data documented that over 92.5% of the employed residents of the City of Redondo Beach commuted to their jobs which were outside the City. The total outflow of Redondo Beach workers is 30,527 (source US Census LEHD, 2014; BAE, 2017). Redondo Beach also imports much of its retail and service sectors workforce from other jurisdictions; however, that number is significantly less than the net outflow of the Redondo Beach residents commuting for work. The following are the key data points from the City's recent economic analysis.</p> <ul style="list-style-type: none"> <li>• The most significant commuter flow data documented that over 92% of the employed residents of the City of</li> </ul>
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	<p>generates traffic. States one third of morning traffic is school drop-off. New housing in South Redondo would reduce this. Presents table with current RBUSD student demographics in support of above assertions.</p> <p>Asserts justice and the law requires that we balance the benefits and burdens of new residents to improve the lives of our new residents. States that research/evidence shows that children who attend racially and economically integrated schools have the best outcomes.</p> <p>To address cited concerns, commenter recommends spreading new housing throughout the city.</p> <p>Asks why fees for new single-family homes are lower than fees for multifamily homes. States that is backwards.</p> <p>Commenter recommends removing current residential height restrictions to increase housing capacity. States advances in elevator technologies to make higher buildings more feasible and attractive for medically-fragile residents.</p> <p>Notes additional advances in building technologies and recommends the City allow recycling of multi-family as well as SFHs throughout the City and build mid-rise of up to 11 stories.</p> <p>Recommends amending parking regulations and base on unit size/type and generally reduce required parking to reduce housing costs.</p> <p>Commenter submitted additional analysis of the 2020 Census Data compared to 2010 Census Data using an interactive map program. Reports that data infers coastal South Redondo is losing both homes and people, particularly in the harbor area. Recommends gaining people in the Riviera Village or adding people without adding homes near Beach Cities Health District. Presents table with Census Tract population/homes data for 2010 and 2020.</p>	<p>Redondo Beach commuted to their jobs which were outside the City.</p> <ul style="list-style-type: none"> <li>• There is an existing demand for approximately 400,000 square feet of professional office space in Redondo Beach.</li> </ul> <p>According to the most recent SCAG Regional Transportation Plan (2016), Redondo Beach had a Jobs-to-Household Ratio of 0.83 in 2012. This indicates that there were only approximately 0.83 citywide jobs per Redondo Beach household, one of the lowest ratios in the South Bay.</p> <p>Additionally, with recommended housing site locations for low-income housing adjacent to the Galleria, along 190<sup>th</sup> Street, and along South/Central Pacific Coast Hwy, there are ample options for in-proximity housing for the City's service related workforce in South Redondo. Even the low-income housing recommended at the North Tech location is within a large shopping center (that per the property owner would be retained) and in close proximity to another large shopping center within ½ a mile distance and less than 2 miles from the Aviation/Artesia commercial corridor and less than 6 miles from the furthest South Redondo service jobs. It's important to note that most trips for the service workforce take place outside AM and PM peak travel</p>
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		<p>States that RHNA requires City to provide 8% more homes in 8 years. Claims City has only provided 15 in last 10 years. Recent development trends won't meet needs of our children or RHNA. Claims we are adding people mainly because adult children are living with their parents for lack of affordable alternatives.</p> <p>States that entire region is experiencing the same housing affordability issues as Redondo Beach. Long commutes which generates horrible traffic and parking problems while at the same time essential workers can't find a place to live in the communities they serve.</p> <p>Recommends:</p> <ul style="list-style-type: none"> <li>• Building workforce housing at all income levels in the neighborhoods where the jobs are located.</li> <li>• Build safe and supportive cycling infrastructure so that people can commute safely by bike even after dark.</li> <li>• Work with Metro and local transit agencies to provide more frequent buses.</li> <li>• Build transit-oriented housing near the train stations and high frequency bus corridors.</li> </ul>	<p>times making additional potential local traffic impacts minimal.</p> <p>After carefully reviewing the commenter's data regarding balanced school integration there is nearly an identical average % of low-income elementary student ratios between the elementary schools in North Redondo, 14.2%, and South Redondo, 13.3%, which over time will create more balance than the current discrepancy between Adams MS and Parras MS. Additionally, all of the recommended housing sites locations are in close proximity to numerous Elementary Schools and over half of the recommended sites are near both Junior High Schools and Redondo Union High School.</p> <p>Regarding the commenter's concerns with the location of the recommended housing site in proximity to the freeway and the stress of potential air and noise pollution on children the following is presented.</p> <p>Any future redevelopment of high density residential within any of the proposed housing sites will be subject to the requirements of the California Environmental Quality Act (CEQA) to address potential environmental impacts of a future project. Additionally, the current General Plan update will include an environmental justice analyses (as required by Senate Bill (SB) 1000) to address the</p>
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			<p>potential for health effects in low-income communities and communities of color as they may apply. At the time of the future General Plan Amendment for the application of the Residential Overlay designations, the environmental justice issues will be addressed and mitigation as required to be determined through the associated environmental analysis will be applied.</p> <p>Regarding costs associated with single family developments versus multi-family developments, the City, as are all public agencies, bound by State law to only charge fees pursuant to the time and costs associated with the review of the development project. There must be a rational nexus for any fees charged by the City and single-family developments are less complicated and as a result typically require much less time and are therefore assessed less fees to process. The City cannot manipulate fees to incentivize one development type over another.</p> <p>Regarding the commenter's recommendations for relaxing residential development standards, including building height, stories, and parking requirements the following is presented/recommended.</p> <p>As the City continues to review and update its General Plan Land Use Element future opportunities exist to engage the process for</p>
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			<p>the introduction of revising existing land use policies and ultimately zoning ordinance residential development standards including height, stories, and parking. The City's General Plan Advisory Committee (GPAC) will conduct five (5) more PLANRedondo meetings, of which three (3) will be focused on land use element policies. The commenter is encouraged to participate in these futures publicly noticed meetings and request consideration of her recommendations. The noted GPAC meetings are planned for Spring 2022.</p> <p>The commenter's summary recommendations concerning workforce housing for all income levels and all neighborhoods, safe and supporting cycling infrastructure, coordinating with Metro and local transit agencies to increase frequency of buses, and development of transit oriented development are in some cases already reflected within the 6<sup>th</sup> Cycle 2021-2029 Housing Element, for example, the two largest housing sites for lower income housing are sited in proximity to an existing and proposed Metro rail stations. Also the City's accessory dwelling unit ordinance and plan to implement an inclusionary housing ordinance will serve to provide affordable housing in neighborhoods throughout the City and furthering balancing locations for future affordable housing and locating it near job centers for all types of workers.</p>
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			<p>Concerning cycling infrastructure and Metro and transit agency coordination, although the City is not currently updating its Circulation Element it is anticipated that an update to this General Plan element will be initiated during this Housing Cycle and the commenter is again encouraged to work with the GPAC to introduce policies that could be placed in the Land Use element to ensure these topics are clarified and pursued further when the City updates its Circulation Element.</p>
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<p>Via HCD: 12.14.21 Grace Peng emails to HCD: September 3, 2021 and December 13, 2021</p>	<p>Grace Peng, PhD, Resident</p>	<p><b>09.03.21 Grace Peng Email to HCD (forwarded to City on 12.14.21):</b> Notes she is Redondo Beach Housing Element “watchdog”. Inquired with HCD about one site she believed was “unrealistic for Lower Income housing.” Asked questions of HCD including if HCD had written the City a letter yet and which sites HCD disallowed and which sites are still under review?</p> <p>Claims the draft 2021 RB HE “wholly inadequate and in violation of AFFH.” Claims that having all the City’s Very Low-Income housing “relegated” to one site next to the freeway, is a clear violation.</p> <p>She claims that she demonstrated through her “GIS 5 class capstone” that the City’s draft housing element is bad in terms of meeting the basic needs of people who live in RB.</p> <p>Children and people should not be placed right next to the freeway, especially on the of the busiest freeways in the US with over 250,000 vehicles every day.</p> <p>Claims City is treating low income people like toxic waste.</p> <p>The 2021 RB draft HE puts nearly all of the lower income children in Adams Middle School, which already enrolls over twice as many poor children as Parras Middle School.</p> <p>The only High School in the City’s district is in South RB and the bus system serving it is inadequate. School district has outsourced their school bus service to Beach Cities Transit, which has a very small fleet of 32-40 seat buses. The buses are to small and fill up when they are 3 miles from school. This is disparate impact on families that do not have cars.</p> <p><b>The draft RB HE removes 1000 sites that were available in 2014 HE.</b></p> <p>Claims that City won’t let BCHD build 600 units of senior apartments at 11 acre closed hospital.</p>	<p>Concerning the commenters questions to HCD about housing sites, the City is in receipt of two (2) letters from HCD. The most recent HCD letter, dated January 5, 2022, had the following comments/requests for information on three (3) of the City’s proposed housing sites:</p> <ol style="list-style-type: none"> <li>1. North Tech Site: Suitability of Nonvacant Sites. HCD cited Government Code section 65583.2, subdivision (g)(2) concerning existing uses and their presumption to impede additional residential development.</li> </ol> <p>The revised HE now includes more details concerning the planned future development regulations which would not require the discontinuance of the existing uses but rather would allow the existing uses to continue and the parking areas to be developed with residentially separately. Additionally, for this site the area was reduced to only the portion of the site that received strong interest and experience in the planned envisioned future residential development at this location/site.</p> <ol style="list-style-type: none"> <li>2. One South PCH Site and the 190<sup>th</sup> Street Sites: Small Sites. (South PCH and 190<sup>th</sup> Street Sites less than 0.5 acres). HCD listed sites in these areas that were less than 0.50 acres and requested additional information concerning the viability of these “small sites”.</li> </ol>
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	<p>Claims the owner of the soon-to-close AES power plan wants to build housing and the city won't let him.</p> <p><b>12.13.21 Grace Peng Email to HCD and State DOJ (forwarded to City on 12.14.21):</b>          "Implores" State HCD and DOJ not to accept the RB housing element. Claims that the City's HE only allows new homes along dangerous, noisy, and polluted arterial roads, and removed mixed use in the "whiter and more affluent" coastal areas and changed zoning adjacent to the 405 freeway to put all low-income housing there.</p> <p>Claims that Mayor Bill Brand and 3/5 majority City Council have approved policies to obstruct housing production, including passing an inclusionary zoning ordinance that:</p> <ol style="list-style-type: none"> <li>1. Exempts Single-Family Homes from paying any in-lieu fees</li> <li>2. Charges in-lieu fees by the square foot, as required, but the per square foot fees rises with the number of units.             <ol style="list-style-type: none"> <li>a. A 4,500 sf SFH replacing a smaller home pays nothing, a duplex totaling the same 4,500 sf pays \$8,100, and nine 500 sf apartments (4,500 sf) will be charged \$64,800.</li> </ol> </li> <li>3. IZ units are subject to the same (already high) parking requirements as market rate, despite evidence that lower income residents own fewer cars.</li> </ol> <p>Cites a number of additional concerns with a future proposed Inclusionary Housing Ordinance. Claims that the City raised its Quimby Fee to \$35,000 for each additional unit of housing with Inclusionary Housing still subject to the current Quimby Fee of \$25,000 per unit.</p> <p>Notes that the Mayor took issue with Planning Commissioners that accepted plans for 300 apartments at the South Bay Galleria Mall. Claims that the City Council only approved 150 units at the South Bay Galleria Mall.</p>	<p>The City has engaged property owners of the sites noted by HCD and has confirmed strong interest from most of the identified "small sites" to sell or consolidate with adjacent properties and pursue future residential development. Additionally, those sites that have not shown interest were not included in the housing calculation forecast/capacity for these areas. The revised HE was updated to reflect this information.</p> <p>3. North Kingsdale Sites: HCD noted an internal inconsistency in HE. The HE identified that this site would accommodate both moderate-income housing <u>and</u> lower-income housing. Additional meetings with the property owner confirmed that this site is planned to accommodate 15% lower-income housing. The revised HE reconciles this noted inconsistency.</p> <p>The commenters claim that the HE is "wholly inadequate and in violation of AFFH." because it places all the City's affordable house in one location has been addressed in the revised HE. In response, the North Tech Site that the commenter referenced has been significantly revised downward in terms of its area and number of potential very low/low income units that it could accommodate. Additionally, the revised HE has identified numerous additional sites throughout the City to accommodate the lost housing capacity</p>
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		<p>Commenter takes issue with City's analysis and discussion of possible updates to Redondo Beach's housing and land use regulations to address/mitigate potential impacts from Senate Bill 9 (SB9).</p> <p>Claims Redondo Beach has contempt for state and federal housing laws. States that "zoning is supposed to protect residents from harm." Claims Redondo Beach bans additional homes in the healthiest areas while forcing future residents to live in the most polluted and dangerous areas next to freeways and 40 mph truck routes.</p> <p>States, "Please, please, take zoning decisions away from Redondo Beach officials. They cannot be trusted to act in the public interest."</p>	<p>resulting from the reduced number of housing units at the North Tech Site.</p> <p>In careful review of the commenters various claims with respect to school district data, the following response/analysis is provided:</p> <p>Concerning middle school student population data, it is factual that Adams MS has a higher % of low-income students than that of Parras MS, however only by a factor of 1.5x not the "2x to 3x" that the commenter claims. In addition to the low-income student populations it is also important to evaluate the land areas and overall student populations of the impacted school facilities to ensure additional capacity exists. The consideration of overall real school capacity is not necessarily a direct AFFH consideration but nevertheless an important consideration that the City investigated as part of its housing sites analysis. In consideration of a school area factor Parras MS is significantly more constrained in area, 10 acres vs. the Adams school complex which sits on a 24-acre site (shared with Washington Elementary and the RBUSD) which has considerably more area in the event additional school classroom facilities are warranted. Concerning total student populations, Parras MS's (1,257 students) existing overall student population is 15% larger than Adams MS (1,066 students). When</p>
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			<p>considering these overarching issues Adams MS has additional area and overall potential capacity to accommodate future student populations compared with Parras MS. Looking now more closely at the “low-income” student populations in the City/School District we can also see that it is much more balanced across the City than the commenter represents. If we review the elementary school data, the percentage of low-income students is nearly identical between elementary schools south of 190<sup>th</sup> Street (13%) and north of 190<sup>th</sup> Street (14%). This demonstrates the general equity of the Redondo Beach low income student population moving forward during this planning period. As the elementary school population advances through grade levels, the % of low-income student population becomes more equally distributed throughout the City. As the student population moves from MS to HS the low-income population is then more weighted towards schools south of 190<sup>th</sup> street. With a comprehensive analysis of the school district data and in consideration of all the school age populations and their locations it is clearly demonstrated that the City’s low-income student population is equally distributed throughout the City and not in violation of AFFH requirements with respect to low-income student populations.</p>
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			<p>Concerning the commenters claims that the City won't let BCHD build 600 units of senior apartments at 11 acre closed hospital, the following is provided in response.</p> <p>This is not factual on two (2) counts. First, BCHD is not proposing the build 600 units of senior apartments. The preferred project approved by BCHD, but not yet submitted to the City of Redondo Beach for its review, is for an assisted living facility for less than 300 Seniors. These units do not qualify as residential units as they are not independent living quarters with kitchens. Second, the BCHD project has not yet been submitted to the City of Redondo Beach for review and processing. The proposed use is a conditionally permitted use and until the project is thoroughly reviewed the City has no official position concerning this project and will work with BCHD on the future project. It is premature to claim the City will not permit a future BCHD assisted living facility.</p> <p>Concerning the commenters claims that the City won't allow housing on the AES the following response is provided.</p> <p>The AES site is not currently zoned for residential development. The AES site is currently an operating power plant and cannot be relied upon as a housing site in the 6th Cycle Housing Element due to the</p>
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			<p>continuing mandated extension of the use of the power plant due to climate change and inadequate power supply in California, as stated by the California Independent System Operator in recent hearings before the California State Water Resources Control Board. This will be exacerbated as the Diablo Canyon Nuclear Plant is removed from service. See pages 5 and 6 of the City's revised HE for a detailed history of the AES site and the many initiatives over the years that have attempted and failed to include housing at this location.</p> <p>Concerning the commenters claims that the City only allows homes along dangerous, noisy, and polluted arterial roads, and removed mixed use in the "whiter and more affluent" coastal areas and changed zoning adjacent to the 405 freeway to put all low-income housing there the following response is provided.</p> <p>The majority of the proposed housing sites are in fact along the City's commercial and mixed-use zoning corridors as these locations have the larger parcels to accommodate future high-density housing development and the roadways with capacity for accommodating future anticipated trips as well as transit stops/facilities to provide additional transit options. Additionally, some additional sites added in the revised HE (South PCH) have</p>
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			<p>increased the allowable density from 35 DU/AC to 55 DU/AC. Additionally, the North Tech Site (referred to by the commenter as the site “adjacent to the 405 freeway) only accounts for 4.9% of the City’s affordable housing unit capacity.</p> <p>Regarding the commenters claims that the City Council has approved policies to obstruct housing production, including passing an inclusionary zoning ordinance the following is provided.</p> <p>The City has not yet adopted an inclusionary housing ordinance and its particular component requirements have not yet been determined. The City is considering an inclusionary housing ordinance to promote affordable housing in neighborhoods throughout the City not to obstruct the future development of housing.</p> <p>Regarding the commenters claims that the City raised its Quimby Fee to \$35,000 for each additional unit of housing. This is not factual and is incorrect. The City has not raised its Quimby Fee to \$35,000.</p> <p>Regarding the commenters claims that the City Council only approved 150 units at the South Bay Galleria Mall. This is not factual and is incorrect. The City approved 300 residential apartment units with 20% affordable to low-income or 10% to very</p>
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			<p>low-income. Additionally, up to 5% of the housing is to be offered first to teachers and air force personnel with minimum deposits and other relaxed lease terms.</p> <p>Concerning the commenters remarks on Senate Bill 9 (SB9). The City is complying with the State law as written.</p> <p>Concerning the commenters claims that Redondo Beach bans additional homes in the healthiest areas while forcing future residents to live in the most polluted and dangerous areas next to freeways and 40 mph truck routes the following response is provided.</p> <p>The City's HE proposes housing throughout the City and in all its neighborhoods. "Residential Recycling", "Housing on Church Properties", and "Mixed Use" are located throughout the City and account for approximately half of the City's remaining RHNA. Additionally, less than 5% of the City's affordable housing is located at the North Tech Site (adjacent to the 405 Freeway). It is correct that many of the remaining sites for affordable housing are located in commercial districts however it is important to note that these proposed locations are near the City's transit center and a planned Green Line station.</p>
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<p>Via HCD email on 01.21.22 Grace Peng email to HCD on 01.21.22</p>	<p>Grace Peng, PhD, Resident</p>	<p>Alerting HCD to “all the ways that Redondo Beach is trying to stifle housing production while telling your office (HCD) otherwise.”</p> <p>Claims that the City Council, at their meeting on 01.13.22, voted to resubmit the previously rejected HE “with more narrative” but without adding and sites.</p> <p>Claims the City is violating AFFH because all the major sites are north of 190<sup>th</sup> and zoned for Adams Middle School, which already has 3x the low-income students as Parras MS and for Washington and Lincoln Elementary with Washington having the highest % of low-income student population. States that AFFH requires that low-income students be placed throughout the city, and in higher numbers near schools that currently have fewer low-income students.</p> <p>Commenter provided a table with Redondo Beach School District student population information in support of her claims.</p> <p>Notes her personal experiences as a mom/school volunteer at Madison ES and Adams MS with “Title I” student populations and recommends these students be spread throughout the school district.</p> <p>Cites that Council Member Zein Obagi Jr says that it is right to put housing on the periphery of the city because it will result in the lowest “traffic congestion in the interior of the city”. Commenter claims that Council Member Obagi argues that “VMT in the interior of the city is all that matters” and that new residents at the periphery won’t have any business in the city.</p> <p>Commenter notes that “Traffic flows both ways.” Cites that a spatial mismatch between jobs and housing, and between where children live and existing schools generates traffic. Cites that 30% of morning and afternoon traffic is due to student dropoff/pickup. Putting new housing walking distance to elementary schools reduces traffic/VMT.</p>	<p>Concerning the commenters claims that the City Council, at their meeting on 01.13.22, voted to resubmit the previously rejected HE “with more narrative” but without adding any sites the following is provided.</p> <p>This is not factual and is incorrect. The City Council directed staff and the consultant to reduce the capacity of the North Tech site and investigate additional sites near the Galleria, the City’s Transit Center, and future location of Metro’s planned Green Line Station, as well as other locations throughout the City. As evidenced in the revised HE, additional sites throughout the City have been identified.</p> <p>Concerning the commenters claims that the City is “violating AFFH” because of the impacts on schools as it relates to “low-income students”, a careful review of the commenters school district data was conducted and the following response is presented.</p> <p>Concerning middle school student population data, it is factual that Adams MS has a higher % of low-income students than that of Parras MS, however only by a factor of 1.5x not the “2x to 3x” that the commenter claims. In addition to the low-income student populations it is also important to evaluate the land areas and overall student populations of the impacted</p>
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	<p>Claims that CM Zein Obagi Jr said there will never be low income housing by the beach. Commenter opposes this claimed statement. Notes that there is subsidized housing right next to the beach adjacent to Veterans Park and it can be built there again.</p> <p>Claims that the City is a “significant job center”, “the coast is a state park and a regional tourist destination.” Claims that Redondo Beach is “built on the backs of an army of low-income workers coming in to cook, clean and take care of our children and elderly.”</p> <p>States that “Provisioning housing for our workers would reduce traffic, not generate it. Conveniently putting low-income housing near low-income jobs would also put low-income students in the schools with the lowest current enrollment, spreading the benefits and burdens of a diverse student populace more evenly.”</p> <p>Cites that South Redondo Beach borders the 7<sup>th</sup> largest job center in LA County, Torrance-Carson. North Redondo Beach borders the 3<sup>rd</sup> largest. Cites that South Redondo Beach is home to physicians who work at the 3 hospitals in Torrance-Harbor City. Wants south Redondo Beach to also be home to nurses, technicians, assistants, janitors. Desires street engineering to provide safe micro-mobility making hundreds of thousands of jobs accessible without a car in a 5-mile radius. Cites the City’s adoption of the South Bay Bicycle Master Plan in 2011 and claims that the City has only built a small portion of it. Claims that if completed, there would be safe connections across the City’s busy arterial roads, and VMT could be drastically lowered.</p> <p>Claims South Redondo Beach is not a “transit desert”. Notes the various bus lines that run every 30-60 minutes. Cites the various transportation providers and routes that connect South Redondo Beach with Downtown LA, claiming it is faster than driving and parking. Notes that North Redondo Beach is served by a frequent Beach Cities Transit line that connects neighborhoods to the green line light rail station at the northeast corner of the City. Not having</p>	<p>school facilities to ensure additional capacity exists. The consideration of overall real school capacity is not necessarily a direct AFFH consideration but nevertheless an important consideration that the City investigated as part of its housing sites analysis. In consideration of a school area factor Perras MS is significantly more constrained in area, 10 acres vs. the Adams school complex which sits on a 24-acre site (shared with Washington Elementary and the RBUSD) which has considerably more area in the event additional school classroom facilities are warranted. Concerning total student populations, Perras MS’s (1,257 students) existing overall student population is 15% larger than Adams MS (1,066 students). When considering these overarching issues Adams MS has additional area and overall potential capacity to accommodate future student populations compared with Perras MS. Looking now more closely at the “low-income” student populations in the City/School District we can also see that it is much more balanced across the City than the commenter represents. If we review the elementary school data, the percentage of low-income students is nearly identical between elementary schools south of 190<sup>th</sup> Street (13%) and north of 190<sup>th</sup> Street (14%). This demonstrates the general equity of the Redondo Beach low income student population moving forward during this</p>
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		<p>high-frequency lines on Hawthorne, Crenshaw, or on I-110 is a policy choice that should change.</p> <p>Claims that City is trying to suppress housing by making it infeasible with stricter standards as part of the City's update to their residential design guidelines. Claims the City is attempting to lower its allowable building envelopes. Claims mezzanines could accommodate ADU's and that the City may not allow for them with the update to the City's residential design guidelines. Commenter also noted discussions concerning basements and that the City should permit them to accommodate future ADU's.</p> <p>Claims that the City is trying to limit allowable building envelopes to reduce the potential for ADU's while the City is telling HCD that ADU production will increase in the future.</p> <p>Claims and requests the following: "Redondo Beach leadership has no plan to meet our obligation to the region to build our fair share of housing. In fact, by adopting inclusionary zoning, doubling Quimby fees, and ratcheting down building volumes they are using the entire playbook of housing suppression techniques. Please do not certify the City of Redondo Beach's Housing Element."</p>	<p>planning period. As the elementary school population advances through grade levels, the % of low-income student population becomes more equally distributed throughout the City. As the student population moves from MS to HS the low-income population is then more weighted towards schools south of 190<sup>th</sup> street. With a comprehensive analysis of the school district data and in consideration of all the school age populations and their locations it is clearly demonstrated that the City's low-income student population is equally distributed throughout the City and not in violation of AFFH requirements with respect to low-income student populations.</p> <p>Concerning the commenter's claims that Council Member Obagi argues that "VMT in the interior of the city is all that matters" and that new residents at the periphery won't have any business in the city it is important to note that Council Member Obagi (4<sup>th</sup> District) accepted the majority of the affordable housing sites in his district. He did note that the City's transit center and future Green Line station in proximity was the predominant reason for his support of housing in his district which supports and is consistent with transit-oriented land use principles.</p> <p>Concerning the commenters claims that CM Zein Obagi Jr said there will never be low</p>
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			<p>income housing by the beach, the following is presented.</p> <p>CM Obagi supports the sites inventory proposed within the revised HE. Additionally, CM Obagi has gone on record in support of a future inclusionary housing ordinance which will include future projects containing affordable units throughout the City, including “by the beach”.</p> <p>Regarding the commenters claims that the City is a “significant job center”, “the coast is a state park and a regional tourist destination.” and Redondo Beach is “built on the backs of an army of low-income workers coming in to cook, clean and take care of our children and elderly.” the following is provided.</p> <p>The reference to “significant job center” is not factual when compared with the City’s existing resident population. As part of the City’s ongoing General Plan Update, a city-wide market/economic study was conducted and confirmed that 93% of the City’s resident working population commutes outside of the City for work. The City’s beaches and harbor (coast) are not a State Park. It is factual that the City’s beaches and pier/waterfront support a tourist industry and in support of housing workers in this industry the City’s existing and most dense residential areas are in proximity to these</p>
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			<p>areas which provide the City's largest existing supply of high-density housing and housing types. Additionally, as planned in the revised HE, approximated 30% of the City's proposed "affordable housing sites" are within approximately 2 miles of the beaches and waterfront an along transit corridors with easy access to these locations.</p> <p>Regarding the commenters statement, "Provisioning housing for our workers would reduce traffic, not generate it. Conveniently putting low-income housing near low-income jobs would also put low-income students in the schools with the lowest current enrollment, spreading the benefits and burdens of a diverse student populace more evenly." the following is provided.</p> <p>The City concurs with the commenters opinion on providing housing for workers in in proximity to low-income jobs. As such the revised HE has the majority of affordable housing sites in proximity to the City's largest retail center, the Galleria, and 30% of affordable housing sites within approximately 2 miles of our beaches and waterfront, another large service commercial center within the City. As noted previously the affordable housing sites within approximately 2 miles of the beaches/pier/waterfront are along well served commercial/transit corridors.</p>
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			<p>Concerning the commenters remarks regarding the City's low-income student population, see the City's prior comprehensive remarks/analysis of the City's low-income student population and the confirmation that in consideration of the City's entire low-income student population (K-12) more low-income students are at schools south of 190<sup>th</sup> street.</p> <p>Concerning the commenters remarks regarding proximity to job centers outside the city, the 3 hospitals in Torrance-Harbor City, a desire for technicians and service workers that support the noted job centers and hospitals to live in South Redondo, and safe micro-mobility and the South Bay Master Bicycle Plan the following is provided.</p> <p>The City shares the commenters concerns and desires with respect to all these elements of a balanced and comprehensive approach to jobs/housing balance and mobility. With the majority of housing sites identified in the revised HE located in proximity to the City's transit center and future Green Line Station the principles of Transit Oriented Development served as an important factor to integrate transit and housing. Additionally, the City is making the further implementation of the South Bay Master Bicycle Plan a priority in the next budget cycle. Again, the City shares the</p>
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			<p>commenters desires on these matters and has demonstrated this in the revised HE and as part of upcoming City priorities.</p> <p>Concerning the commenters remarks on transit service in South Redondo the City agrees. All of the proposed South Redondo housing sites in the revised HE are along the city's commercial corridors and arterials in with the most frequent transit services.</p> <p>Regarding the commenter's remarks concerning the City's ongoing work upon its Residential Design Guidelines, the following is provided.</p> <p>In response to recent changes in State law the City is updating its Residential Design Guidelines in large part to streamline the future development of housing throughout the City. As required by State law, the current "subjective and quasi discretionary" residential design guidelines are being amended to "objective standards". This will significantly reduce the time to process future residential projects by removing the subjective nature of the process. This update coupled with the many elements of Program 13 within the revised HE will serve to support the timely development of housing moving forward.</p> <p>Concerning the commenters remarks regarding ADU's. The following is presented.</p>
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			<p>The City has recently updated it's ADU ordinance and it is fully compliant with State Law. Any future residential standards resulting from the City's ongoing update to its Residential Design Guidelines or to future residential zoning standards could not limit the development of ADU's as long as the future proposed ADU complies with applicable City/State ADU regulations. To be clear in the event a proposed ADU complies with the City/State ADU regulations and conflicts with a Residential Design Guideline/Standard and or zoning development standard the City/State ADU regulation takes precedence and is allowable.</p> <p>Concerning the commenters closing remarks... "Redondo Beach leadership has no plan to meet our obligation to the region to build our fair share of housing. In fact, by adopting inclusionary zoning, doubling Quimby fees, and ratcheting down building volumes they are using the entire playbook of housing suppression techniques. Please do not certify the City of Redondo Beach's Housing Element.", the City disagrees. The City's revised HE and plans for an inclusionary housing ordinance demonstrate the City's commitment to housing development in the future. This is consistent with Redondo Beach's historical support of housing as demonstrated comprehensively</p>
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			<p>in the "Executive Summary" of the revised HE. The City has no plans to double it's Quimby fees or to ratchet down building volumes (although clearly defining objective residential development standards is ongoing in an effort to streamline future housing development).</p>
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<p>Via HCD email on 02.02.22; Leo Pustilnikov email to HCD on 02.01.22</p>	<p>Leo Pustilnikov, Property Owner</p>	<p>Relays to HCD, via email on 02.01.22, City Council discussions concerning housing sites on retail parking lots (e.g. Living Spaces and Vons). Claims that the retail tenants have a “tenant control area” restricting any such development in their parking lots. Attached an “example” of a “zone of control” document he claims is for the “Vons” (North Tech) housing site that requires any development of the parking lot without “Vons” approval.</p> <p>Claims that the 1100 N. Harbor (AES power plant) property can be developed within the 6th cycle. Notes he has a study from EFI and AECOM demonstrating housing can be developed within the 6<sup>th</sup> cycle.</p> <p>Notes another site at 1021 N. Harbor (1 acre in size) is surrounded by housing developed at 70-120 dwelling units per acre and requires no clean up and the city is not considering it because the commenter owns it.</p> <p>Claims that the City wants a 25-acre park on the AES site but doesn’t want to pay for it.</p>	<p>Concerning the commenters remarks regarding “tenant control areas” the City is having ongoing discussions with property owners and tenants at housing sites that include potential parking lot development. At this time feedback concerning parking has maintained that as long as the number of existing available parking spaces is retained for the existing commercial tenants, all parties contacted remain supportive of these housing site locations and the envisioned high-density residential concepts. As evidenced by the property owner of the North Tech site specifically, similar concepts to what is proposed in Redondo Beach is demonstrated in their correspondence to the City dated September 22, 2021.</p> <p>Concerning the commenters claim that the “1100 N. Harbor (AES power plant) property can be developed within the 6<sup>th</sup> cycle” and his claim that the that the City wants a 25-acre park on the AES site but doesn’t want to pay for it, the City refers the commenter to the “Executive Summary” of the revised HE and specifically, pages 4, 5, and 6, and the letter dated February 10, 2022, signed by California State Assemblymember Al Muratsuchi (66<sup>th</sup> District) and California State Senator Ben Allen (26<sup>th</sup> District). The “Executive Summary” in the revised</p>
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			<p>HE contains significant details chronicling the history and current standing of the AES power plant inclusive of the multiple city-wide public votes that have included residential development options all of which have failed. Additionally, the City along with the assistance of Los Angeles County, the California Natural Resources Agency, the State Coastal Conservancy, the Wildlife Conservation Board, surrounding communities, and the offices of State Assemblymember Al Muratsuchi and State Senator Ben Allen, continue to work for the restoration of the wetlands at the site and the creation of a regional park and open space amenity for the public.</p> <p>Concerning the commenters reference to 1021 N. Harbor, the City has considered the site and at this time has determined the site as infeasible. The building on the subject property has been identified as a historic structure as it originally served as a pumping station in support of the power plant at 1100 N. Harbor Drive. The existing structure exhibits potential significant historic architectural value.</p>
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<p>Via HCD email on 02.07.22 Roger Light email to HCD on 02.04.22</p>	<p>Roger Light, Resident</p>	<p>Commenter sent letter to HCD via email. Email message requests that HCD consider his letter when they deliberate on housing at the AES power plant as it may not be a feasible site and would not assist the unhoused.</p> <p>Commenter cites that a “minority of RB council persons” is proposing rezoning for high density housing at the AES power plant site.</p> <p>Notes he is a longtime resident of RB that has been “fighting” for years to decommission the AES power plant. Also notes that he and “many others” have fought “equally hard” to ensure the area is restored as a wetland and thoughtfully managed. Claims that South Redondo Beach is one of the most densely populated areas of this region and the AES site is zoned for recreational purposes and parkland. Claims the proposal for high density housing at this site by a small group of residents is in reaction to having some housing sites identified in their portion of the city.</p> <p>Claims a majority of residents have spoken loudly in four separate elections and “most do not want to have high density housing on the retiring AES power plant site,...”. Claims this is the desire of a “wealthy developer”.</p> <p>Claims that Redondo Beach has a long history of “over-development” resulting in the “unfortunately well-earned nickname, “Condo Redondo””.</p> <p>Claims there is a “movement” to use the issue of homelessness and statewide mandates on housing density to “push for having over 1000 units” built on the AES site.</p> <p>Commenter notes that he is a North Redondo District 5 resident but is not a NIMBY. Notes that he could say (but doesn’t) “Go overbuild some more in South Redondo”. Notes traffic congestion and overcrowded schools and lack of parkland in South Redondo. Claims that those pushing for zone change of AES site are from North Redondo and are “working to exploit division in our community”.</p>	<p>The commenters primary focus concerns the potential for the AES power plant site to serve as a housing site in the HE. The commenter makes numerous claims and assertions concerning the testimony from members of the public that support identifying the AES power plant site as a housing site in the HE. The commenter cites results from multiple past city-wide public votes documenting prior attempts to develop the AES site that have failed. Additionally, the commenter claims that the AES site is inappropriate for new housing because it is not consistent with State requirements that new developments be close to mass transit and freeway access. The commenter also asserts that the AES site has a wetland that it is mandated by the Coastal Commission to be restored and that the AES site will require significant remediation. The commenter notes he supports a fair distribution throughout the city of increased density housing, including areas in district 5. Claims that with existing higher density in South Redondo it is fair to locate additional new housing in North Redondo.</p> <p>In response to the commenter’s remarks concerning the AES site and other general remarks the City provides the following response.</p>
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		<p>Claims that the voters of Redondo Beach, “even when outspent”, do not support zoning for residential at the AES site. Notes that some mixed use including recreational, parkland, office, and some “modest residential” as part of a planned redevelopment of the waterfront is one thing to consider, but “cramming the majority of required high density housing in the AES site is unconscionable.” Claims that any units in that area will not be affordable.</p> <p>Claims that the AES site is inappropriate for new housing because it is not consistent with State requirements that new developments be close to mass transit and freeway access. Notes that the AES site is not close to a freeway or the Green Line (transit) stop.</p> <p>Claims that the AES site is wetlands with portions of it mandated by the California Coastal Commission to be restored as wetlands. Commenter also claims the site is contaminated and will require “a tremendous amount of remediation” to make the site safe for housing. Claims “It is unreasonable to even propose that the site could provide affordable housing this cycle.”</p> <p>Commenter strongly urges HCD not to consider the AES site for housing.</p>	<p>The revised HE is generally consistent with the commenters disposition concerning the AES site as well as the commenters remarks concerning the City’s proposed distribution of housing sites throughout the City. However, the City would like to refer the commenter to the revised HE and specifically the information concerning the AES power plant site within the “Executive Summary” pages 4, 5, and 6 to better understand the complete and factual record concerning this site. Additionally, the City refers the commenter to the letter dated February 10, 2022, signed by California State Assemblymember Al Muratsuchi (66<sup>th</sup> District) and California State Senator Ben Allen (26<sup>th</sup> District) for facts surrounding the history and efforts to restore the wetland and develop a future park on the AES power plant site.</p>
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<p>Via HCD email on 02.07.22 Dawn Esser email to HCD on 02.06.22</p>	<p>Dawn Esser, Resident</p>	<p>Commenter is 33-year resident of Redondo Beach and 12-year resident activist. Claims that the majority of Redondo Beach residents are against residential development on the AES power plant site. Claims that the two council members and the developer pushing for the residential development are doing so against the wishes of residents and the financial benefit of the City due to the following:</p> <ol style="list-style-type: none"> <li>1. Majority of residents recently voted down residential development on the site when Measure B (included 650 residential units) was defeated. Commenter claims to have spoken to thousands of residents and knows first hand their opposition to residential development at this location due to traffic, over-crowding of schools, and negative financial impacts to the City. Claims that residents do not want Redondo Beach to turn into Santa Monica.</li> <li>2. Residents signing petitions against SB9. Claims SB9 law is for developers and not for affordable housing as it does not include an affordable housing requirement. Claims residents do not want “condo boxes” put up next to them. Upset with no parking requirement, over-crowding of schools, traffic, and a negative quality of life that goes with over-development. Claims SB9 is irresponsible.</li> <li>3. Claims that Redondo has emphasized residential development for 40+ years to the financial detriment of the City. Commenter was on the City’s Budget and Finance Committee for 3 years and the City’s finances. Claims City is in “desperate need of higher revenues”. Cites that over 85% of residents travel out of the City for work, creating traffic grid lock on the majority of streets, like PCH by the AES site. Claims that AES site is the only available property where major commercial development can occur. Claims AES site is “perfect site for a “Google” type campus. Claims the City needs businesses to supply jobs, employ more residents, and balance traffic patterns. Claims residential development costs the City financially, because most of the property taxes to the County and the State and increase costs to the City for residential services (schools, fire, police, trash, sewer, community services).</li> </ol>	<p>The commenters primary focus concerns the potential for the AES power plant site to serve as a housing site in the HE. The commenter opposes residential development on the AES power plant site. The commenter makes claims and assertions concerning two (2) council members that have gone on record in support of the designation of the AES power plant property as a housing site and the current owner of the AES power plant site. Additionally, the commenter notes their opposition to SB9 and the City’s history towards residential development in general. The commenter supports the development of a technology campus and a park (cites results of prior citywide public votes in support of a park at this location) at the AES power plant site.</p> <p>In response to the commenter’s remarks concerning the AES site the City provides the following response.</p> <p>The revised HE does not identify the AES power plant property as a housing site in the revised HE. For additional details and historical perspectives concerning the AES site and the City’s disposition towards residential development in general the City would like to refer the commenter to the revised HE and specifically the information concerning the AES power plant site within the “Executive Summary” pages 4, 5, and 6 as well as the remainder of the “Executive</p>
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		<p>4. Claims residents want a significant park on the AES site and have voted for it many times. The site is zoned for a park. Claims the City has received millions in funds from the County to restore wetlands and support a park.</p> <p>Commenter request that HCD look at all the “issues” when reviewing the future housing plans for Redondo.</p>	<p>Summary” to better understand the complete and factual record concerning this site and residential development in general in the City of Redondo Beach. Additionally, the City refers the commenter to the letter dated February 10, 2022, signed by California State Assemblymember Al Muratsuchi (66<sup>th</sup> District) and California State Senator Ben Allen (26<sup>th</sup> District) for facts surrounding the history and efforts to restore the wetland and develop a future park on the AES power plant site.</p> <p>In response to the commenter’s remarks concerning SB9 the City notes that its current zoning ordinance complies with this recently enacted State law.</p>
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<p>Via HCD email on 02.08.22 Dr. Zaremski email to HCD on 02.08.22</p>	<p>Lori Zaremski, Ph. D., Resident</p>	<p>Commenter strongly disapproves “of the attempt by a small group of misguided Redondo Beach residents to re-zone the AES power plant site in order to allow a huge over development of this precious area which will someday include open space parkland”. Cites that the AES site is currently zoned for recreation and minimal development.</p> <p>Claims that “Mixed use options including recreational facilities, parkland, office building and some modest residential development as part of a planned redevelopment of the Waterfront is what Redondo voters approved in four previous elections.”</p> <p>Claims the AES site is not appropriate for large residential development. Claims it contains “ancient wetlands” and has been contaminated and is not safe for large scale high density residential development. Claims South Redondo already has traffic congestion, overcrowded schools, and lacks parkland.</p> <p>Claims that AES site would not meet State requirements to be close to easy access mass transit and freeway access. AES site is not close to freeway and is over 5 miles from the closest Green Line transit stop.</p> <p>Claims South Redondo Beach is one of the most densely populated areas of this region. Claims proponents of housing at the AES site is a reaction to some in north Redondo Beach not wanting housing in their area.</p> <p>Commenter requests that HCD “look deeply at this matter and scrutinize the misguided attempts by a minority of the community that disregards the best interests of the south bay Los Angeles residents.”</p>	<p>The commenters primary focus concerns the potential for the AES power plant site to serve as a housing site in the HE. The commenter opposes residential development on the AES power plant site. The commenter makes numerous claims and assertions concerning the testimony from members of the public that support identifying the AES power plant site as a housing site in the HE. The commenter cites results from multiple past city-wide public votes documenting prior attempts to develop the AES site that have failed. Additionally, the commenter claims that the AES site is inappropriate for new housing because it is not consistent with State requirements that new developments be close to mass transit and freeway access. The commenter also asserts that the AES site has a wetland and that the site is contaminated and that the AES site will require significant remediation.</p> <p>In response to the commenter’s remarks concerning the AES site the City provides the following response.</p> <p>The revised HE does not identify the AES power plant property as a housing site in the revised HE. For additional details and historical perspectives concerning the AES site and the City’s disposition towards residential development in general the City would like to refer the commenter to the</p>
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			<p>revised HE and specifically the information concerning the AES power plant site within the “Executive Summary” pages 4, 5, and 6 as well as the remainder of the “Executive Summary” to better understand the complete and factual record concerning this site and residential development in general in the City of Redondo Beach. Additionally, the City refers the commenter to the letter dated February 10, 2022, signed by California State Assemblymember Al Muratsuchi (66<sup>th</sup> District) and California State Senator Ben Allen (26<sup>th</sup> District) for facts surrounding the history and efforts to restore the wetland and develop a future park on the AES power plant site.</p> <p>Regarding the commenter’s remarks concerning South Redondo Beach being one of the most densely populated areas of this region, the City has noted that density within South Redondo and portions of North Redondo have similarly high residential densities.</p>
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<p>Via HCD email on 02.10.22 Lezlie Campeggi email to HCD on 02.08.22</p>	<p>Lezlie Campeggi, Resident</p>	<p>Commenter identifies as a long-time resident of Redondo Beach concerned with housing element requirements. Commenter inquired with HCD asking how much weight was given to public comments submitted and voiced on the City's October 5, 2021 adopted HE? Commenter claims that it is largely people that disagree that speak up and those that agree remain quiet and provide less comment. Commenter makes several points in support of their contention that it is typically those that disagree make statements vs. those that agree which make much fewer statements.</p> <p>Commenter goes on to note the following:</p> <ol style="list-style-type: none"> <li>1. Voters in Redondo Beach have 5 TIMES rejected the 50-acre power plant site being re-zoned from open space to housing and development.</li> <li>2. The power plant site does NOT fit the HCD criteria for new affordable housing to be located in close proximity to metro, public transportation hubs.</li> <li>3. The City of Redondo Beach comprises 5 districts, 3 of which are known as North Redondo Beach. There is MORE LAND MASS available in the 3 NORTH Redondo districts than in the 2 southern districts.</li> <li>4. South Redondo Beach has abundance of multi-story, multi-unit housing; far greater and within a smaller footprint than exists in North Redondo Beach.</li> <li>5. The 50-acre power plant site is NOT DELIVERABLE as a contender for this RHNA cycle.</li> <li>6. Ms. Peng's statement in a prior email to you that the City won't let the Beach Cities Health District (BCHD) build 600 units of senior apartments on their 11-acre site in District 3, is also false.</li> <li>7. Correspondence you received from Leonid Pustilnikov, one of the power plant property owners, is self-serving. For him to suggest the City is not conducting itself lawfully regarding his property is 100% false. Mr. Pustilnikov knowingly purchased a 50-acre property zoned for open space, with a conditional use permit to operate a power plant.</li> </ol>	<p>The commenters primary focus concerns the potential for the AES power plant site to serve as a housing site in the HE. The commenter opposes residential development on the AES power plant site. The commenter makes numerous claims and assertions concerning past votes on the AES power plant site, the inability of the AES site to meet multiple State requirements for housing, and other commenters claims including that of the current property owner.</p> <p>In response to the commenter's remarks concerning the AES site the City provides the following response.</p> <p>The revised HE does not identify the AES power plant property as a housing site in the revised HE. For additional details and historical perspectives concerning the AES site and the City's disposition towards residential development in general the City would like to refer the commenter to the revised HE and specifically the information concerning the AES power plant site within the "Executive Summary" pages 4, 5, and 6 as well as the remainder of the "Executive Summary" to better understand the complete and factual record concerning this site and residential development in general in the City of Redondo Beach. Additionally, the City refers the commenter to the letter dated February 10, 2022, signed by</p>
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	<p>The commenter claims that South Redondo has experienced “far more housing development density in a smaller land area than the northern part of the City.” Commenter expresses their position that “It’s time for the Northern part of the City to receive its “fair and equitable share” of new housing distribution to satisfy the RHNA allocations for this cycle.”</p> <p>Commenter relays their personal history of residency in Redondo Beach and their reason for residing in the various districts throughout the City.</p> <p>Commenter requests that HCD, “consider the source” of the comments they receive. Claims the majority of commenters to date on the City’s HE were NIMBYs.</p> <p>Commenter requests that HCD adopt the City’s revised HE and notes that the revised HE “has been carefully evaluated, reviewed to comply with your questions and clarifications, and voted on by our City Council whose majority is RESIDENT centric, aligned with what our citizens want while best matching the HCD requirements.</p> <p>The commenter notes that the Mayor, Council and City Staff have worked very hard to comply with the requirements to revise a Plan that can be certified.</p> <p>Commenter notes in closing that the City of Redondo Beach “is one of the most densely-populated cities on the entire west coast of California, with approximately 12,000 residents per square mile. Yet our RHNA requirement for this cycle is much higher than other cities on a percentage basis, and whose density is far less.”</p>	<p>California State Assemblymember Al Muratsuchi (66<sup>th</sup> District) and California State Senator Ben Allen (26<sup>th</sup> District) for facts surrounding the history and efforts to restore the wetland and develop a future park on the AES power plant site.</p> <p>Concerning the commenters remarks on density and other general comments related to the process of the City’s development of the HE, the City refers the commenter to the records of the many public hearings by the Mayor and City Council where the topic of density and all matters related to the State’s criteria for Housing Elements was analyzed and presented in detail.</p>
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<p>Letter to HCD from Assemblymember Al Muratsuchi and State Senator Ben Allen dated 02.10.22</p>	<p>Assemblymember Al Muratsuchi (66<sup>th</sup> District) and State Senator Ben Allen (26<sup>th</sup> District)</p>	<p>The commenters, State Assemblymember Al Muratsuchi (66<sup>th</sup> District) and State Senator Ben Allen (26<sup>th</sup> District) recite their efforts in assisting the City of Redondo Beach and the County of Los Angeles for “several years” to restore the wetland at that site (AES Power Plan Site) and create a regional park and open space amenity for the public. The commenters additionally note that “these efforts are ongoing with the assistance of the California Natural Resources Agency, State Coastal Conservancy, Wildlife Conservation Board, and surrounding communities.”</p> <p>The commenters additionally cite the following:</p> <ul style="list-style-type: none"> <li>• Along with the efforts regarding wetland restoration and open space creation the site has garnered a number of supportive public votes over the past 20 years for open space.</li> </ul> <p>The commenters cite their concerns with some individuals advocating for a zoning change to allow for residential development on the site. Additionally, the commenters note their concern that a blanket zoning change along the lines that some have advocated without the utmost care to ensure wetlands preservation “would be inconsistent with the community’s long-standing vision for the site and its environmental needs.”</p> <p>The commenters state that they would like to work with you (Robin Huntley, HCD) to ensure that (a rezoning to residential) does not happen.</p> <p>The commenters close their communication with HCD as follows:  “Thank you for taking our concerns regarding this area of the coast under consideration. We are most hopeful that the City’s vision of wetland restoration and park space at the site will finally come to fruition. The community has waited long enough.”</p>	<p>The City’s shares the concerns raised by the commenters and the revised HE is consistent with the commenters request regarding the future use of the AES power plan site.</p>
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**Written Public Comments 6<sup>th</sup> Cycle 2021-2029 Draft Housing Element**

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life*

August 30, 2021

Mr. Sean Scully  
Planning Manager  
City of Redondo Beach  
Community Development Department  
415 Diamond Street  
Redondo Beach, CA 90277

RE: City of Redondo Beach's 2021-2029  
Housing Element  
SCH # 2021080057  
Vic. LA-01 & LA-405 Citywide  
GTS # LA-2021-03676-ND

Dear Mr. Scully:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated NOP. The 2021-2029 Housing Element provides a framework for meeting the housing needs of existing and future resident populations within the City based on the Regional Housing Needs Allocation (RHNA) of 2,490 units within the City limits.

Housing Element identifies strategies and programs to conserve and improve existing affordable housing; provide adequate housing sites; assist in the development of affordable housing; remove governmental and other constraints to housing development; and promote equal housing opportunities in a strategic manner. The 2021-2029 Housing Element proposes additional residential densities within mixed-use designations, residential recycling, residential overlays in commercial and industrial zones, and residential development on religious properties through coordination with nonprofit organizations. Since this is a policy document, the land use designations and zoning amendments associated with the 2021-2029 Housing Element are not under consideration at this time.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying

transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>



Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>

Caltrans encourages lead agencies to prepare traffic safety impact analysis for all developments in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The development anticipated by the Housing Element would constitute infill development as it would occur primarily on underutilized properties within an urbanized area and would consist of various housing types. Additionally, many of the housing sites included within the Housing Element are strategically located in proximity to existing and planned Metro Transit Stations. Future development would be consistent with the City's Circulation Element, which addresses how local and regional traffic will circulate through the City under both existing and future conditions, as well as, addressing the needs of bicyclists, pedestrians, and transit and rail users.

The goals, policies and improvements in the City's Housing Element are also intended to take advantage of existing and future regional rail facilities and create an active street life that would enhance the vitality of businesses while reducing vehicle miles travelled (VMT); reduce traffic congestion while increasing pedestrian safety and welfare; and promote the use of public transit. Therefore, future development consistent with the Housing Element would be expected to generate fewer VMT and more multi-modal trips than conventional development.

For the planning benefits of the City, we recommend the City to disclose existing VMT for the housing element and City's threshold to identify potential CEQA impact. The OPR generalized recommendation is a 15% reduction below the existing VMT as a threshold for CEQA significance. This VMT analysis would provide substantial evidence whether future development would contribute any significant traffic impact. The result would assist the City in mitigating future traffic impact in the planning stage such as identifying effective TDM for the new development or implementing any traffic impact fee program.

Mr. Sean Scully  
August 30, 2021  
Page 4 of 4

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03676-ND.

Sincerely,

*Frances Duong for*

MIYA EDMONSON  
IGR/CEQA Branch Chief

email: State Clearinghouse

## Lina Portolese

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**From:** Therese Mufic Neustaedter (via Google Docs)  
**Sent:** Monday, April 12, 2021 10:27 PM  
**To:** Mendoza, Kathyren@HCD  
**Cc:** gspeng.lwv@gmail.com; Compliance Review@HCD  
**Subject:** Copy of RB Housing Element Comment GSP  
**Attachments:** Copy of RB Housing Element Comment GSP.pdf

tmufic has attached the following document:



### Copy of RB Housing Element Comment GSP



I believe that Redondo Beach is gaming the Housing Element Update. They downzoned the southern white part of town and added the homes all to the less wealthy and white northern end of town. Then they put housing overlays on the industrial area next to the freeway or sandwiched between 3 busy arterials: From Grace Peng. Please let me know if you have any trouble with this file and i will re-send it. Thanks you -- Teri Neustaedter 913 568 5466 tmufic@gmail.com

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

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April 10, 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 alarm about the [draft Housing Element](#) (HE) presented on April 7, 2021. I fear that the CA Dept of Housing and Community Development (HCD) will reject it & we will be mired in costly and time-consuming litigation and conflict with Sacramento. The draft HE does not meet the requirements of Affirmatively Furthering Fair Housing (AFFH) and produces Disparate Impacts. I would like to offer some alternatives.

I attended GPAC meetings in both Redondo Beach and Culver City to compare different approaches. I find it very odd that RB did not examine its past history to understand how we got here and to inform our decisions moving forward as Culver City did. I also find it puzzling that GPAC members felt blindsided by rules that they had only heard about in December 2020. The rules have changed since the last (fifth) RHNA cycle, but the changes were publicly available to anyone who cared to look them up.

California and Federal Fair Housing and Disparate Impacts laws were settled well before 2020. The US Supreme Court ruled on Disparate Impacts in 2015, and HUD has provided guidance to cities repeatedly, including [this plain English summary](#) published in September 2020<sup>1</sup>. Likewise, California's HCD published the [Housing Element Site Inventory Guidebook](#)<sup>2</sup> in June 2020. The [SCAG RHNA subcommittee](#) held many meetings throughout 2018-2019 to craft an equitable, sustainable and legal allocation methodology. Redondo Beach's final sixth RHNA allocation is not substantially different from the [published draft allocations](#) that have been available from their website throughout 2019-2020.

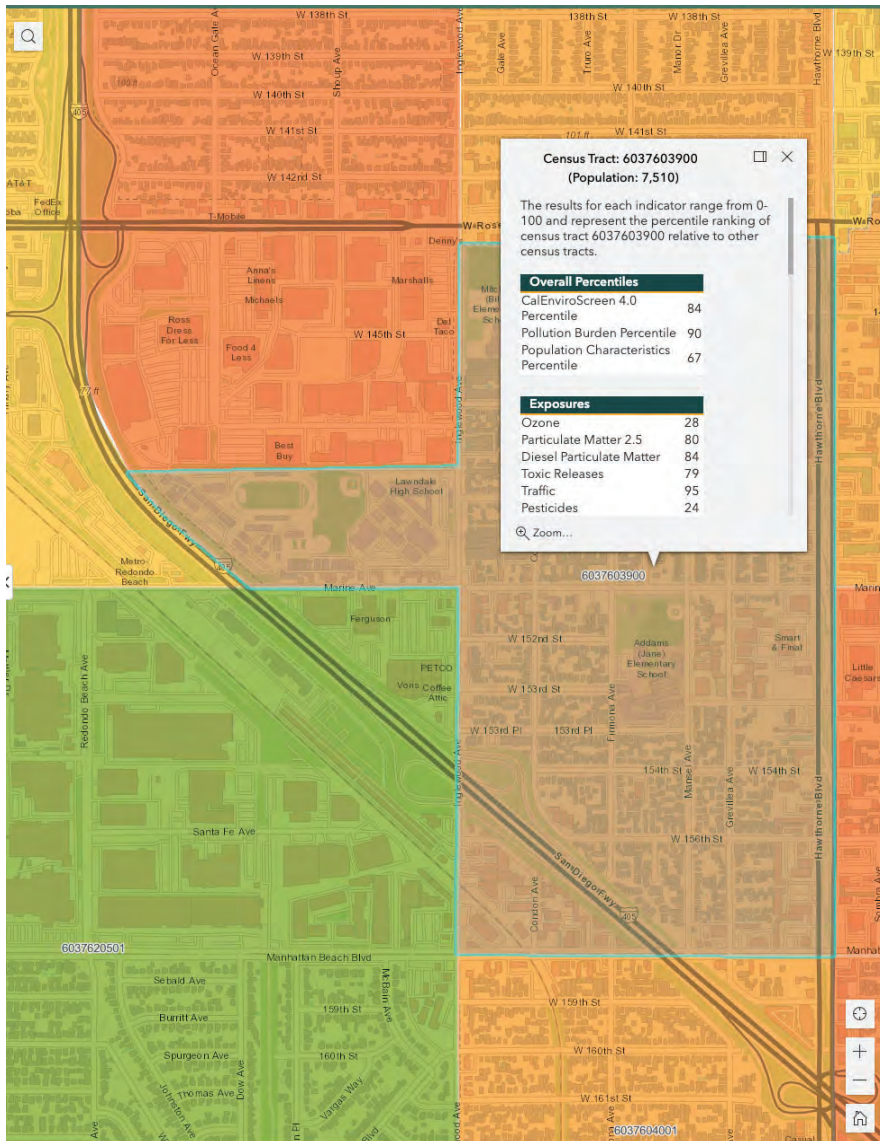
I want to point out that North Redondo Beach is famous for our role in the US Space Program from WWII through the Cold War to today, where billions carry phones with GPS receivers. GPS, a system that has become commonplace infrastructure, was born in our city. The environmental satellites that monitor weather and climate for our planet are made right here. We should be proud of, and carefully safeguard, [this important industry and economic engine](#) for our city. Preserve ample space for the industry at our existing and globally-famous hub for Space Innovation. Do not put a housing overlay on a growth industry and our biggest generator of high-income jobs.

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<sup>1</sup> HUD Issues Final Rule on the Fair Housing Act's Disparate Impact Standard

<sup>2</sup> Housing Element Site Inventory Guidebook Government Code Section 65583.2

GPAC says the draft Housing Element was guided by Environmental Justice, which is required by HCD. I explored [CalEnviroScreen](#) data (both version 3.0 & 4.0) and used their interactive maps. A high score and high percentile is bad; a low score is good. Putting housing in the NE corner (bounded by Inglewood, Marine, Redondo Beach Ave, Manhattan Beach Ave) of our city, next to the 405 freeway and its ramps would kettle residents from the rest of the city and have devastating impacts on future residents, especially young children. Census tract 6205.01 enjoys a relatively moderate Pollution Burden in the 72nd percentile because it is averaged over an area that extends south to Anderson Park and west to Aviation Blvd. However, the Pollution Burden of the housing overlay would be closer to the 90th percentile of census tract 6039.00 (NW Lawndale) which surrounds it on 2 sides.



This picture is purely for orientation purposes. The pop-up shows the EnviroScore data for Lawndale census tract 6039.00. You can see the details much more clearly on the table in Appendix A.

The Housing Overlay in the NE corner of RB (6205.01) is surrounded by 6039.00 and the I-405 freeway. It's true pollution burden is expected to be at least as high as 6039.00's.

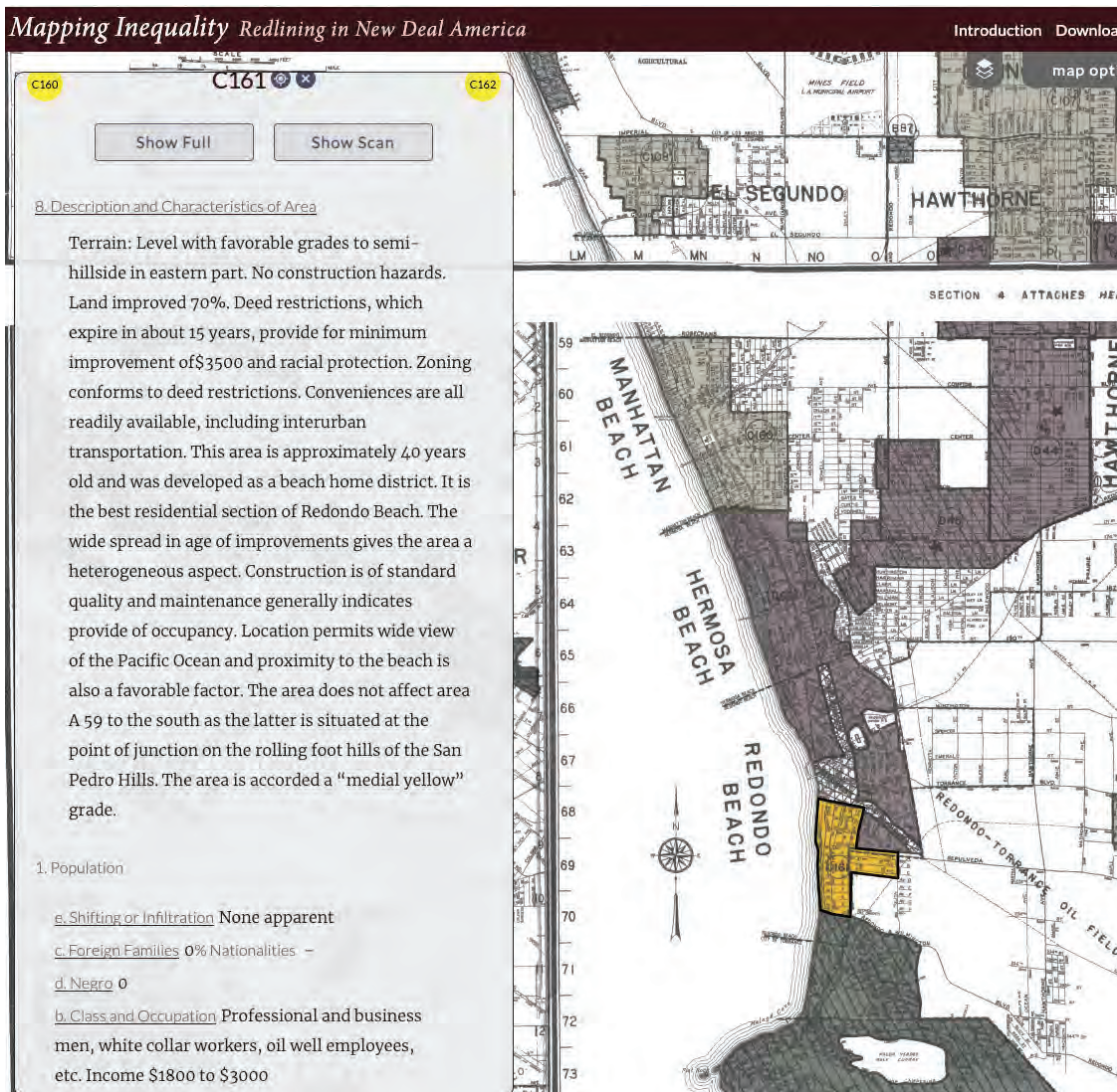
It only looks lower in reporting because 6205.01 averages over a large area away from the freeway and closer to the ocean.

In 2017, [AB 1397](#) gave HCD the power to take into account expected yield of homes that could be built on a site in 8 years. It is unlikely (and not desirable!) that Northrop Grumman would vacate Space Park to enable housing production. HCD is likely to look unkindly on this overlay.



HCD may use “expected yield” of this site and then assign the city a much higher housing target to reflect the expected low yield. Let’s not invite this level of scrutiny and punishment.

Affirmatively Furthering Fair Housing (AFFH) requires us to locate housing to reduce racial and economic segregation. Newcomers are more diverse than existing SRB residents. Redondo Beach still bears the marks of [20th century racist zoning and lending practices](#)<sup>3</sup> that reserved the southern beachfront section for whites only. The harbor area was rated median red while the northern part of the city, which is zoned for R2/R3, was rated low red and not eligible for home loans. Infill and displacement has disproportionately impacted North RB.

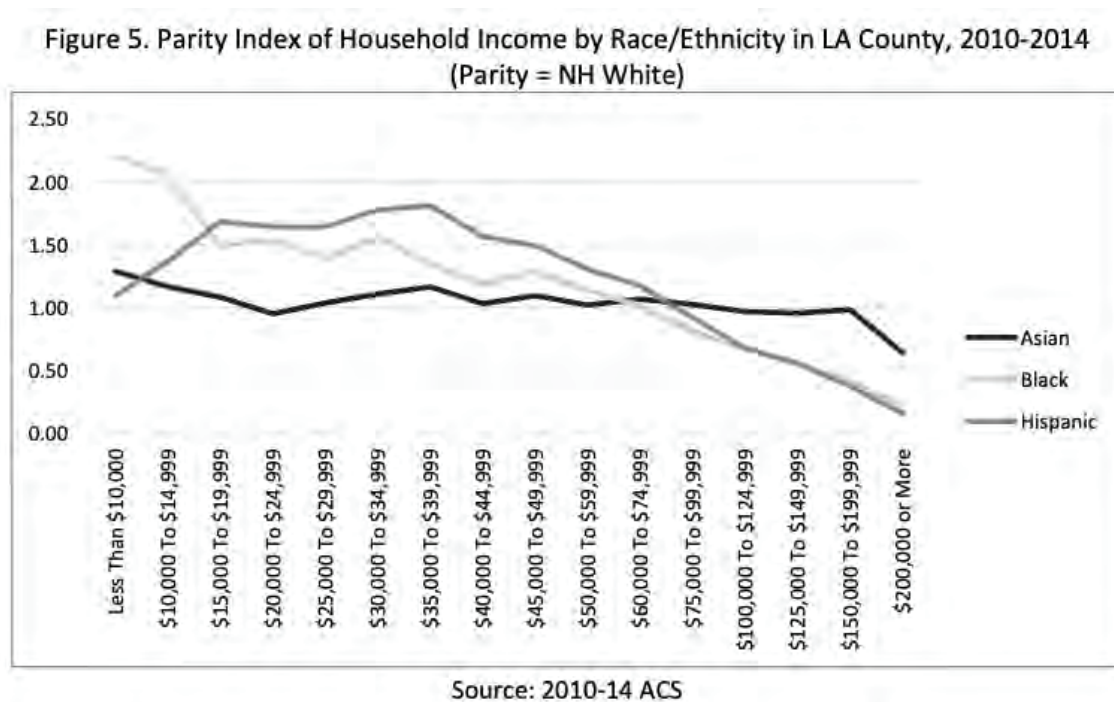


In the century since this map was published, Riviera Village has slowly evolved from 100% nonhispanic white to 75%, compared to 47-62% in North RB and 26.1% for LA County overall.

<sup>3</sup> Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=13/33.863/-118.403&city=los-angeles-ca&area=C161>

It's no accident that Redondo Beach's most integrated census tracts line the Artesia corridor, which saw the most infill home production. Single Family Home (SFH/R1) areas also endure construction, but yield only much larger homes, not additional ones. At a minimum, we should upzone historically exclusionary areas that swapped whites-only covenants for SFH zoning. Our RHNA targets are so high, we should upzone all R1<sup>4</sup> within the city to R2 or R3, and give incentives to combine lots so we can build even more densely.

SCAG's RHNA allocation methodology assigned RB a higher than average low and very low income housing allocation because our city has far below average numbers of VLI/LI units. Additionally, Very Low and Low Income (VLI/LI) residents are [disproportionately people of color](#)<sup>5</sup>. Given HCD's determination that they will only accept parcels larger than 0.5 acres & zoned > 30 homes/acre, we can only meet the VLI/LI requirement by using every possible parcel of our city, including enticements for combining lots.



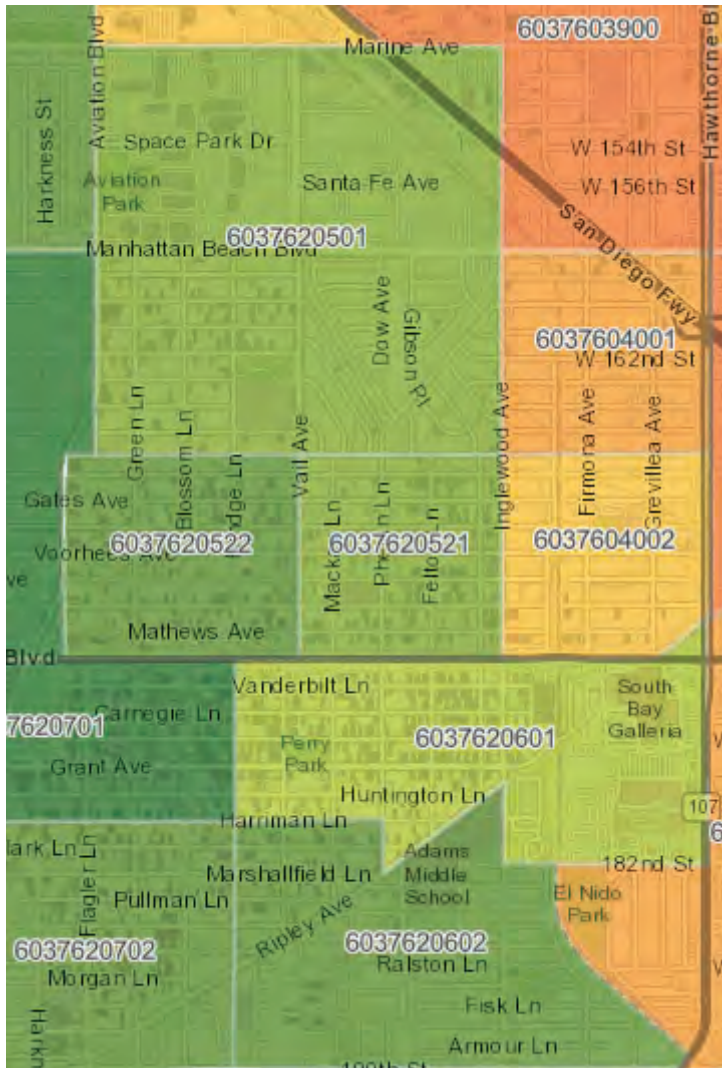
Furthermore, it is extremely challenging to finance VLI/LI homes so that they “pencil out” in an era with low public spending on housing subsidies. The federal government looks like they are willing to provide help. But, we can also make our own luck by using what we've got, which is extremely high rents in SRB. A [USC study found that high rent areas](#) are able to profitably support a higher percentage of inclusionary (subsidized) units than moderate rent ones<sup>6</sup>.

<sup>4</sup> Excluding the already dense R1 small lots currently zoned in census tracts 6207.01 & 6207.02.

<sup>5</sup> Race Ethnicity and Income Segregation in Los Angeles, by Paul Ong, Chhandara Pech, Jenny Chhea, C. Aujean Lee, UCLA Center for Neighborhood Knowledge, June 24, 2016, [https://knowledge.luskin.ucla.edu/wp-content/uploads/2018/01/Race-Ethnicity-and-Income-Segregation-Ziman\\_2016.pdf](https://knowledge.luskin.ucla.edu/wp-content/uploads/2018/01/Race-Ethnicity-and-Income-Segregation-Ziman_2016.pdf)

<sup>6</sup> Los Angeles' Housing Crisis and Local Planning Responses: An Evaluation of Inclusionary Zoning and the TransitOriented Communities Plan as Policy Solutions in Los Angeles, Linna Zhu, Evgeny Burinskiy,





The draft plan puts all new dense housing in the corner of census tract 6205.01 next to the freeway and on the eastern edge of 6206.01 between extremely busy Hawthorne and Artesia Blvds and Inglewood Ave, another arterial. Students living in the proposed housing sites will have to cross train tracks and at least one arterial to reach elementary schools. This creates disparate pollution and traffic impacts on newer, poorer and less white residents.

Those areas also feed into the schools (Adams, Madison and Washington) with the highest concentration of low income and Title I students in our city's school district. These schools also suffer disproportionately from overcrowding than schools in wealthier parts of RB bypassed for new housing in the draft HE, another disparate impact.

The city owns a large surface parking lot in (75% nonhispanic white) Riviera Village & should build housing above the parking. RV is ideal for mixed use because most of it is not next to busy arterials and children do not have to cross one to reach an elementary school. RB can give inducements to private property owners in the RV to combine lots & build mixed use.

Reducing segregation would benefit the children of South RB. Each year, Adams (North) and Parras (South) Middle School's rising RUHS Freshman attend a meet and greet "Field Day". My daughter and her friends reported bullying from the Parras children. She said that a PMS student told her, "You don't seem ghetto" and thought that was a compliment.

The AES power plant in 6212.04 is slated to close shortly. The only reason that area has a middling 45-50 pollution burden percentile is because of AES's pollution. After closure and

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Jorge De la Roca, Richard K Green, Marlon G. Boarnet; Cityscape: A Journal of Policy Development and Research, 2021

remediation, the site’s pollution burden is expected to be drastically reduced. A CalEnviroScore in the cleanest decile is probable. The proximity to the beach also means it will command the highest rents. Combined with the size of the parcel, it should be able to fit & “pencil out” the highest number of VLI/LI units in the city.

There is an environmental justice component to repurposing the AES site, which hosted an early power plant to light the whites-only resort of South RB. It used so much water for cooling that it caused seawater intrusion into wells used by inland communities of color. That led to early adjudication of ground-water pumping in the LA Basin and the use of seawater for cooling, which is also ecologically damaging.

11% of Los Angeles County Households do not own any cars. Half of LA Co HHs own 0 or 1 cars. Putting a car-light mixed-income community at AES would heal the environmental and psychic damage wrought by the power plant.

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

Kettling VLI/LI residents in a corner cut off from the rest of the city by freeways, arterials and train tracks is not AFFH and creates Disparate Impacts. There are better ways and the ideas outlined here are just a start. We can’t change our past and shameful history of deliberate segregation, but we can do better in the future. It starts with better and more equitable zoning today.

Grace Peng, PhD  
6205.22 Resident

Appendix A: [CalEnviroScreen 4.0](#) data for Redondo Beach with Lawndale and LA County data for context. Population figures from US Census Bureau's 2018 American Community Survey

Census Tract	Total Population	Area Description	DRAFT CES 4.0 Percentile	Pollution Burden Pctl	Asthma Pctl	Cardiovascular Disease Pctl	Hispanic (%)	White (%)	African American (%)	Native American (%)	Asian American (%)	Pacific Islander (%)	Other/Multi-racial (%)
603900	7510	NW Lawndale	83.90	90.06	71.37	62.60	66.2	13.1	7.5	0.0	10.9	0.2	2.0
620501	6063	TRW, Anderson	27.91	72.08	17.93	28.45	20.1	55.8	4.8	1.0	10.6	0.2	7.4
620521	4092	Artesia NE	25.52	27.95	21.98	21.21	14.5	51.4	2.8	0.0	17.8	0.5	13.0
620522	4968	Artesia NW	11.26	29.84	21.83	36.86	17.3	52.6	2.7	0.0	14.9	0.0	12.5
620601	5030	Galleria	35.85	50.32	23.90	40.83	26.0	46.6	3.3	0.0	16.6	0.0	7.4
620602	5165	Adams	17.68	63.36	12.65	19.07	23.6	59.3	0.0	0.2	13.5	0.0	3.3
620701	7184	Artesia SW	9.02	41.42	12.52	20.78	13.3	63.3	5.7	0.9	11.1	0.0	5.6
620702	7391	Jefferson	17.35	41.12	21.37	35.90	14.0	62.3	2.6	0.0	15.5	0.2	5.4
621201	6601	RUHS	12.08	52.22	5.11	9.00	25.7	57.4	0.7	0.5	11.2	0.0	4.4
621204	3142	AES	31.13	44.95	7.33	17.34	11.7	66.2	4.6	0.0	13.6	0.4	3.5
621301	6819	Alta Vista	15.70	33.15	9.55	23.13	11.5	64.8	3.6	0.0	13.9	0.0	6.3
621324	3804	Veterans Park	13.22	27.97	9.67	23.82	20.6	65.6	1.4	0.0	9.1	0.0	3.3
621326	2945	Riviera Village	9.94	23.43	9.67	23.82	13.6	75.0	1.5	0.0	5.6	0.0	4.3
621400	4496	SE PCH	7.05	37.26	6.18	13.91	12.1	71.2	2.5	0.0	9.5	0.0	4.7
LA County	10,039,107	LAC Average					48.6	26.1	9.0	1.4	15.4	0.4	3.1

## Lina Portolese

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**From:** Coy, Melinda@HCD  
**Sent:** Thursday, May 20, 2021 5:33 PM  
**To:** Mendoza, Kathyren@HCD  
**Subject:** FW: Redondo Beach Housing Element - Comment Letter

Can you pdf their letter and store in the public comments folder for the review?

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**From:** Anthony Dedousis <anthony@abundanthousingla.org>  
**Sent:** Thursday, May 20, 2021 4:08 PM  
**To:** Kirkeby, Megan@HCD <Megan.Kirkeby@hcd.ca.gov>; Coy, Melinda@HCD <Melinda.Coy@hcd.ca.gov>; McDougall, Paul@HCD <Paul.McDougall@hcd.ca.gov>; Buckley, Tyrone@HCD <Tyrone.Buckley@hcd.ca.gov>  
**Cc:** Leonora Camner <leonora@abundanthousingla.org>; Compliance Review@HCD <compliancereview@hcd.ca.gov>; Velasquez, Gustavo@HCD <Gustavo.Velasquez@hcd.ca.gov>; Jon Wizard <jon@yimbylaw.org>; Jes McBride <jes@yimbylaw.org>; Sonja Trauss <sonja@yimbylaw.org>  
**Subject:** Redondo Beach Housing Element - Comment Letter

Hi Melinda, Megan, Tyrone, and Paul,

Hope your week is going well. I'm reaching out to [share a letter \[drive.google.com\]](https://drive.google.com) from Abundant Housing LA and YIMBY Law regarding Redondo Beach's draft housing element. As you will see, our letter expresses major concerns about the City's intended approach to updating the housing element. We believe that the City's intended approach does not satisfy the intent of state law, which is to expand housing availability at all income levels.

The attached letter contains a detailed explanation of where we view Redondo Beach as having fallen short of HCD's standards and state law. We respectfully request the opportunity to discuss the issues raised in this letter with your team. Thank you for your consideration.

Regards,

Anthony

--

**Anthony Dedousis**

Director, Policy and Research  
Abundant Housing LA  
515 S Flower Street, 18th Floor  
Los Angeles, CA 90071  
516-660-7402



May 20, 2021

Mr. Gustavo Velasquez  
Director, California Department of Housing & Community Development  
2020 West El Camino Avenue, Suite 500  
Sacramento, CA 95833

Dear Director Velasquez,

We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding Redondo Beach's 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law's** mission is to make housing in California more accessible and affordable through enforcement of state housing law. We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

In October 2020, AHLA [shared a letter](#) with the Redondo Beach City Council and Planning Department, providing guidance on how the City should fulfill both the letter and the spirit of housing element law. We have reviewed the City of Redondo Beach Planning Commission staff report regarding the General Plan Advisory Committee's proposed changes to the City's General Plan, **and we have major concerns about the City's willingness and ability to meet its state-mandated RHNA target of 2,490 homes by 2029.** The staff report and draft site inventory are inconsistent with HCD's instructions and the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686.

**We are especially concerned that the City has failed to identify enough sites where the RHNA housing growth goal can be accommodated by 2029.**

The City, by its own admission, considers that only 64 units per year (i.e., one-fifth of the legally required RHNA allocation) is sufficient to meet the City's housing demand and population growth for the next two decades.<sup>1</sup> The City also intended to reduce the City's zoned capacity by at least 1,600 units before Senate Bill 166 (2017) banned this form of downzoning.<sup>2</sup> Given this history, it is not surprising that the proposed General Plan revisions appear designed to encourage relatively little new housing.

The 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.

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<sup>1</sup> Admin Report, p. 61.

<sup>2</sup> April 15, 2021 Planning Commission presentation, p.19.

3. The City bans new mixed-use development in locations where it has successfully been built in recent years.

First: it is unlikely that the City's rezoning plan will encourage meaningful housing growth. The City's list of "critical Housing Element sites" includes:<sup>3</sup>

- **The block bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards.** The City's major employers are all located here, including Northrop Grumman (which provides 1/3 of all jobs in Redondo Beach, and which is the City's largest employer), DHL, the Amazon distribution center, the Uber Greenlight facility, and a trio of new hotels.<sup>4</sup> The City's plan indicates that apartments will be built there as a result of rezoning.
  - However, while it is a good idea to encourage housing near jobs and transit, **this particular proposal is not credible for the simple reason that Northrop Grumman is very unlikely to vacate Space Park over the next 8 years.** Perhaps acknowledging this reality, the City's presentation states that it would defer to Northrop Grumman's wishes if any housing were proposed for the site, whatever those wishes might be.<sup>5</sup>
- **The Galleria District, excluding the Galleria itself.** The South Bay Galleria owners are in the process of building homes on the Galleria parcel. But under the City's plan, no additional residential development on the Galleria site would be allowed. The City's alternative is to allow apartments on the land surrounding the Galleria, which are currently occupied by strip malls, bungalows and industrial sites -- but those properties' owners have shown no interest in residential redevelopment of these sites.

Per HCD guidelines, if a jurisdiction assigns more than 50% of its lower-income RHNA to nonvacant sites (a near-certain scenario for Redondo Beach), the jurisdiction must make findings supported by "substantial evidence" that the sites' existing uses are "likely to be discontinued during the planning period."<sup>6</sup> But Planning failed to provide convincing evidence that redevelopment on the above sites is likely to happen.

Second: the City overlooks large numbers of potential housing sites, including:

- **The AES site (51 acres).** The new owner proposes to use the land for offices, hotel space and retail, with no residential component.<sup>7</sup> The land is currently zoned industrial, and the City Council would have to rezone that land to accommodate commercial use in any case. This is a golden opportunity to build lots of housing in one of Redondo Beach's most desirable areas. If the whole site were built out at ~55 units per acre (i.e., the City of Los Angeles's R3 density), nearly all of Redondo Beach's RHNA allocation could be met in one fell swoop.

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<sup>3</sup> Admin Report, p. 72.

<sup>4</sup> <https://www.redondo.org/civicax/filebank/blobload.aspx?BlobID=39015>

<sup>5</sup> April 15th, 2021 Planning Commission presentation, p. 48

<sup>6</sup> Gov't Code 65583.2(g)(2), also [HCD Site Inventory Guidebook, pg. 26-28](#)

<sup>7</sup> <https://www.dailybreeze.com/2020/03/30/aes-redondo-beach-power-plant-finalizes-sale-to-private-developer/>



- **The former South Bay Medical Center site (9.3 acres).** This site is currently being used for ordinary medical offices and is owned by the Beach Cities Health District, with vast, lightly-used parking lots which would be suitable for construction of housing. The entire parcel is 9.3 acres; if redeveloped at 55 units per acre (Los Angeles R3 density) that site alone could accommodate 20% of Redondo Beach’s RHNA allocation. Although the site is currently being redeveloped, it has capacity for additional housing. The current plans for senior housing have already been scaled down by nearly 50% from the original size, with acres of surface parking to be retained.<sup>8</sup>
- **Beachside parking lots (24 acres).** The City has large amounts of extremely valuable beachside acreage zoned Coastal Commercial. At least 24 acres is currently used for surface parking lots.<sup>9</sup> Recent sales, pre-COVID, suggest that Redondo Beach buildings near the beach sell for ~\$670 per square foot.<sup>10</sup> These are higher prices than South Beach, Miami, which is world-famous for its high-rises.<sup>11</sup> This valuation suggests that large-scale construction, similar to Marina Del Rey, would be economically feasible in these locations.
- **The Space Park and Aviation Park parking lots (62 acres).** Between Marine, Redondo Beach Ave., Manhattan Beach Bl., and Aviation is the Northrop Grumman campus, a ten-minute walk from the Green Line station. The campus is surrounded by 62 acres of parking lots that are close to jobs, transit, and parks, making them a good location for more housing. In Northern California, Google and Facebook have invested in housing construction; perhaps a similar partnership arrangement could be reached with Northrop Grumman.
- **The Riviera Village parking lot (2 acres).** The City owns a 2-acre triangular surface parking lot in Riviera Village that sits at the center of a bustling neighborhood. On this site, another 60 units could be built at the Mullin density, or 215 units at Los Angeles’s R4 density.
- **The west side of the Redondo Beach Transit Center.** It is a best practice to build apartment buildings near mass transit, and the City has planned to build a transit center at 1521 Kingsdale Ave., behind the South Bay Galleria, for over a decade.<sup>12</sup> Metro’s baseline option for extending the Green Line to Torrance includes a station at this location.<sup>13</sup> Yet the City’s plan maintains the current low-density zoning on the west side of the station. Apartment buildings at the maximum legal density should be allowed on all parcels within a half-mile of the station.

Third: the City plans to reduce the amount of development in areas where housing pencils out. This isn’t just a bad idea - it also violates Government Code section 65863.<sup>14</sup> Per HCD, “A jurisdiction may not take any action to reduce a parcel’s residential density unless it makes findings that the remaining sites identified in its Housing Element sites inventory can accommodate the jurisdiction’s remaining unmet RHNA by each income category, or if it

<sup>8</sup> <https://urbanize.city/la/post/new-look-370-million-beach-cities-health-district-campus>

<sup>9</sup> This includes, for example, APN 7505-002-908, 7503-029-900, 7503-033-903, 7503-008-901, 7503-008-902, and 7503-003-900.

<sup>10</sup> E.g., [https://www.zillow.com/homedetails/414-N-Broadway-Redondo-Beach-CA-90277/21317652\\_zpid/](https://www.zillow.com/homedetails/414-N-Broadway-Redondo-Beach-CA-90277/21317652_zpid/)

<sup>11</sup> <https://www.redfin.com/city/11467/FL/Miami-Beach/housing-market>

<sup>12</sup> <https://www.dailybreeze.com/2009/09/03/redondo-beach-approves-plans-for-new-transit-center/>

<sup>13</sup> <https://urbanize.city/la/post/more-details-emerge-south-bay-metro-rail-extension>

<sup>14</sup> This is also known as SB166 (2017).



identifies additional sites so that there is no net loss of residential unit capacity.”<sup>15</sup> Downzoning is illegal unless the City can show that the additional capacity is made up for elsewhere. Here, it is not.

Parcels proposed for downzoning include:

- **The South Bay Galleria.** The City has approved 300 apartments, 175,000 square feet of office space, and a hotel, on the block bounded by Kingsdale, Hawthorne, 177th and Artesia.<sup>16</sup> By proposing to downzone that parcel, the City has effectively eliminated any possibility of more housing being built on the site if the current redevelopment succeeds. Allowing more housing on the site makes perfect sense: the Torrance extension of the Green Line will stop at the Galleria, and the area is served by a half-dozen bus lines.<sup>17</sup> In spite of this, the City proposes to eliminate the mixed-use designation, making further residential development impossible. Tellingly, the Galleria’s owners are already building housing on the site, suggesting that more homes might be built in the future. The upzoning of the surrounding parcels, ostensibly to satisfy No Net Loss, does little to improve the situation, because none of those landowners have shown any interest in building housing.
- **Pacific Coast Highway.** Along PCH, the City has battled the developers of One South (1920 S. Pacific Coast Highway) and Legado Redondo (1700 S. Pacific Coast Highway) to downsize the new buildings, going so far as to impose a moratorium on new mixed-use development in 2017.<sup>18</sup> Perhaps having observed that new mixed-use development along PCH is feasible, the City would deter further development by banning new mixed-use development along PCH and moving the housing overlay a mile to the north.
- **Artesia Boulevard.** Here, the Montecito (2001 Artesia Bl., built 2008) and Aviation Villas (1733 Aviation Bl., built 2005) are examples of relatively new housing construction in this area. The City proposes to ban new apartment buildings along Artesia. To replace this capacity, the City plans to redevelop two commercial plots along 190th, at Mary Anne and Meyer. Given a clear indication that developers want to build apartments along Artesia, it is troubling that the City wouldn’t encourage housing on 190th **and** on Artesia.

In short, the City’s plan is: (i) plan for houses where they will not be built, (ii) leave the city’s underutilized land as-is, and (iii) ban new apartments in places where they have been built recently.<sup>19</sup> **This is a plan for failure.**

Additionally, **Planning’s intended approach to updating the housing element does not affirmatively further fair housing and reverse existing patterns of residential segregation.**

AB 686 (2018) requires housing element updates to “affirmatively further fair housing”, which is defined as “taking meaningful actions, in addition to combating discrimination, that overcome

<sup>15</sup><https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb-166-final.pdf>

<sup>16</sup> <https://www.redondo.org/civicax/filebank/blobdload.aspx?BlobID=36759>

<sup>17</sup> <http://media.metro.net/2020/GLExt-to-Torrance-Eng-map.pdf>

<sup>18</sup> <https://urbanize.city/la/post/one-south-condos-near-completion-redondo-beach> and <https://urbanize.city/la/post/site-prep-starting-rare-mixed-use-development-redondo-beach>

<sup>19</sup> Admin. Report, p. 67.

patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” **The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.**

In April 2021, HCD issued an [AFFH Guidance Memo](#), which establishes a number of important principles for promoting fair housing, including:

- A city’s AFFH analysis should reveal “current and historical spatial patterns of subsidized housing within and surrounding the jurisdiction, including emergency shelters, subsidized affordable housing, supportive housing, and usage of housing choice vouchers.”<sup>20</sup>
- The distribution of housing-element inventory sites with lower or moderate income capacity must not be skewed toward lower-income neighborhoods. To demonstrate that the site inventory furthers fair housing, the city must calculate the percentage of households at lower, moderate, and above-moderate income levels in each census tract or “block group” in the city, and then do the same for the lower, moderate, and above-moderate-income RHNA units assigned to the tract or block group. The share of lower-income RHNA units assigned to tracts (or block groups) with a higher-than-average share of lower-income households should be less than the current share of lower-income households in those tracts.<sup>21</sup>
- The housing element must benchmark the citywide distribution of household incomes against the distribution in the county or region, and state. The AFFH program of a predominantly high-income city, like Redondo Beach, must break down barriers that keep lower income and minority households from accessing housing in the city.<sup>22</sup>
- “Goals, policies, and actions” to further fair housing must be “aggressively set to overcome ... contributing factors [to fair housing problems, and thus] to meet the ‘meaningful impact’ requirement in statute.” AFFH Guidance Memo, p. 52. The list of actions shall include concrete timeframes for implementation, measurable outcomes, explicit prioritization (“high,” “medium,” or “low”), and “must be created with the intention to have a significant impact, well beyond a continuation of past actions.”<sup>23</sup>
- “The schedule of actions generally must” (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places.<sup>24</sup>

**However, the City has not presented satisfactory evidence on any of the above points.** Its proposed site inventory, which does little to encourage housing growth, is therefore unlikely to advance the goal of socioeconomic integration or greater housing affordability. Also, by proposing to accommodate the vast majority of the RHNA goal in the North Redondo block bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards, a location with significant exposure to freeway noise and pollution, and by deterring housing growth in

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<sup>20</sup> AFFH Guidance Memo, p. 46

<sup>21</sup> AFFH Guidance Memo, p. 47

<sup>22</sup> AFFH Guidance Memo, pp. 15, 32-34, 77

<sup>23</sup> AFFH Guidance Memo pp. 52, 71

<sup>24</sup> AFFH Guidance Memo, p. 54

South Redondo, where environmental quality is significantly better, the City risks perpetuating the concentration of lower-income households in areas with poor environmental quality.

**Redondo Beach can do better.** The City is already required to identify and remove constraints to housing production under Government Code section 65583. The City should commit to major constraint removal policies in order to encourage strong housing growth at all levels of income, including:

- Legalizing apartments and rowhouses on all residentially-zoned parcels in the City, including R1 parcels where single-family detached homes are required by law.
- Significant upzoning of parcels located near transit, job centers, schools, and parks in order to expand the supply of housing.
- Legalizing by-right residential and mixed-use development on commercially-zoned parcels.
- Pre-approval of standard ADU, small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.
- Introducing a density bonus program similar to Los Angeles’s Transit Oriented Communities program to permit additional affordable housing to be built near mass transit.<sup>25</sup>
- Establishing a small lot subdivision program similar to the City of Los Angeles to provide for flexible neighborhood-scale development.<sup>26</sup>
- Establishing a fast ministerial review process to approve new multifamily buildings. Sacramento has adopted a citywide ordinance which provides for 60-day approval of projects with 150 units or less, and 90-day approval for projects with 151-200 units.<sup>27</sup> Santa Monica has also adopted a ministerial review ordinance, and the time to approve new housing has dropped by 75%.
- Citywide elimination of on-site minimum parking mandates, which drive up the cost of housing production and reinforce car dependency.
- More flexibility on height, floor-area ratio, and lot coverage.

The City of Redondo Beach has a legal obligation to sufficiently plan to meet current and future residents’ housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. The issues that we’ve highlighted above suggest that the City is not on a path to fulfilling this legal obligation. We respectfully urge you to remind the City of its legal obligation to accommodate the RHNA goal by promoting a variety of attainable housing options for the residents and workers of Redondo Beach.

Thank you for your consideration.

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<sup>25</sup> <https://planning.lacity.org/plans-policies/transit-oriented-communities-incentive-program>

<sup>26</sup> <https://www.laconservancy.org/small-lot-subdivision-ordinance>

<sup>27</sup> <https://www.cityofsacramento.org/Community-Development/Planning/Major-Projects/Ministerial-Housing>

Sincerely,

Leonora Camner  
Executive Director  
Abundant Housing LA

Anthony Dedousis  
Director of Policy and Research  
Abundant Housing LA

Sonja Trauss  
Executive Director  
YIMBY Law

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom  
Assemblymember David Chiu, California State Assembly  
Senator Scott Wiener, California State Senate  
Mayor Bill Brand, City of Redondo Beach  
City Council, City of Redondo Beach  
Joe Hoefgen, City Manager, City of Redondo Beach

## Lina Portolese

---

**From:** Compliance Review@HCD  
**Sent:** Tuesday, June 1, 2021 11:23 AM  
**To:** Housing Elements@HCD  
**Cc:** Mendoza, Kathyren@HCD  
**Subject:** FW: Redondo Beach

Third Party comments for Redondo beach

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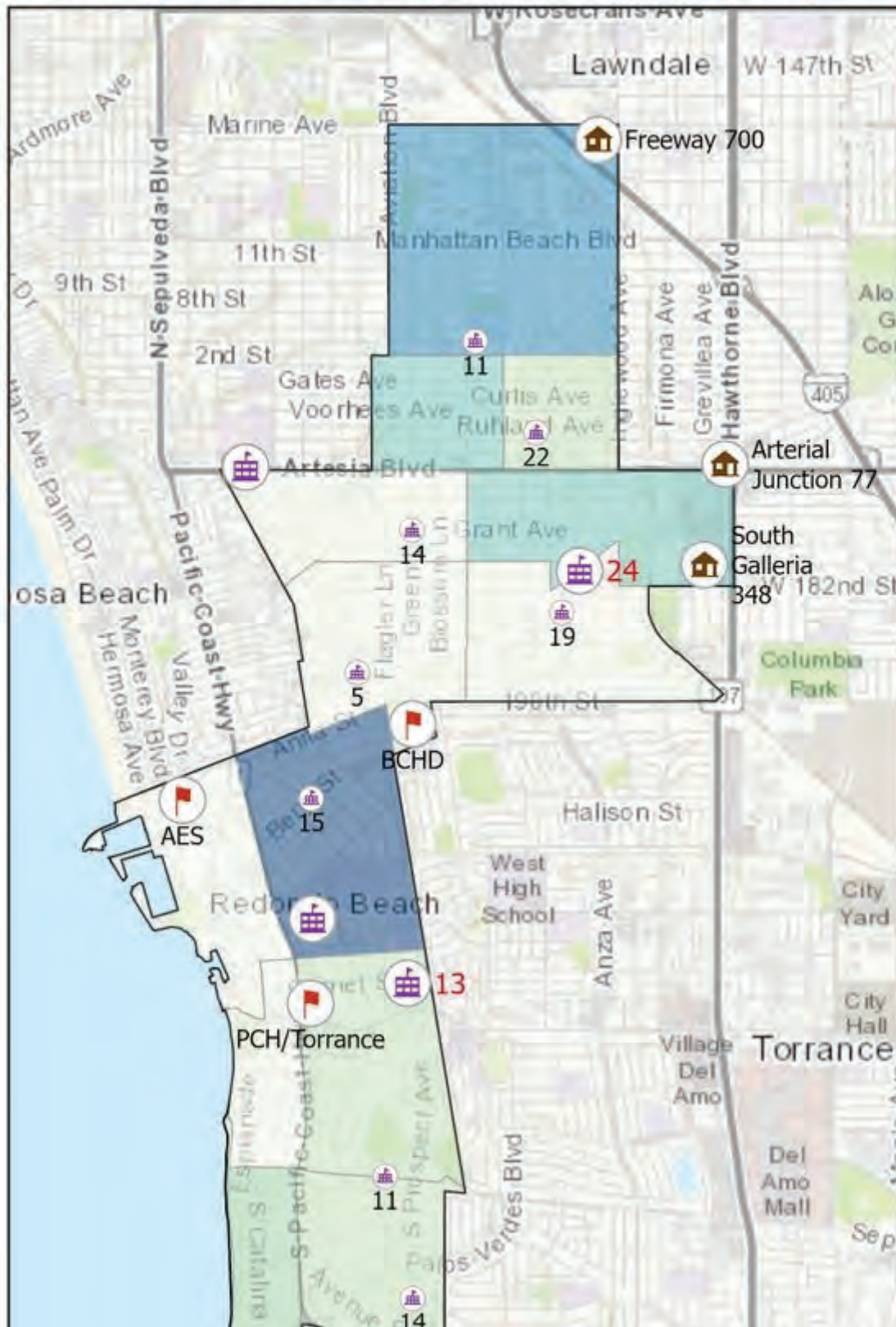
**From:** Jon Wizard <jon@yimbylaw.org>  
**Sent:** Saturday, May 29, 2021 11:20 AM  
**To:** Compliance Review@HCD <compliancereview@hcd.ca.gov>  
**Cc:** Eleanor.Manzano@redondo.org; brandy.forbes@redondo.org  
**Subject:** Redondo Beach

Hello,

Redondo Beach resident and third-party commenter Dr. Grace Peng created the following graphic that represents the city's current strategy for site selection in their housing element update. I understand they haven't yet submitted anything to HCD, but could you please see to it that the city's assigned reviewer sees this resource? Dr. Peng has been an active participant in the city's housing element discussions but a majority of the council has been unresponsive to her input thus far.



# Redondo Beach Housing Element Update Concentrates Child Poverty



- RB\_Elemen
  - RB\_Middle\_
  - Public\_High
  - Major\_Sites
  - Unused\_Sit
- Child\_Pov\_1**  
Children below poverty line
- 0
  - 1 - 12
  - 13 - 26
  - 27 - 38
  - 39 - 50
  - 51 - 70
  - 71 - 84
  - 85-89
  - 91 - 94
  - Redondo\_B

Affirmatively Furth requires that cities reduce racial and This plan fails the density low incom funnel children int which has the high students.

Red text: % LI mi  
Black text: % LI e  
Brown: Major proj units  
Red flags: sites wl

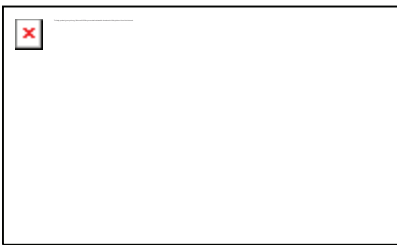
<https://pbs.twimg.com/media/E2iD7aFUcAAkEyp.jpg> [pbs.twimg.com]

Please also see this letter Dr. Peng wrote that includes other graphics and concerns about the city's progress toward a plan that affirmatively obstructs fair housing and perpetuates racially concentrated areas of affluence.

<https://abundanthousingla.org/whats-wrong-with-redondo-beachs-housing-element-open-letter/>  
[abundanthousingla.org]

Thank you,  
Jon  
--

Jon Wizard  
Policy Director he/him  
Campaign for Fair Housing Elements



[fairhousingelements.org]

[YIMBY Law \[yimbylaw.org\]](http://YIMBY Law yimbylaw.org)

1390 Market Street  
San Francisco, CA 94102

[fairhousingelements.org](http://fairhousingelements.org) [fairhousingelements.org]

Book a [15-minute \[calendly.com\]](https://calendly.com) or [30-minute \[calendly.com\]](https://calendly.com) meeting with me  
[calendly.com/housingelements \[calendly.com\]](https://calendly.com/housingelements) → housing element watchdogs calendar



From: [Maher, Bill @ South Bay](#)  
To: [RBHousingElement](#)  
Subject: Potential Site for Redondo's Future Housing Needs  
Date: Friday, July 9, 2021 10:39:48 AM  
Attachments: [306-312 S Catalina Avenue, Redondo Beach OM.pdf](#)

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

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.

Bill Maher | First Vice President  
**CBRE | Investment Properties | Office, Medical & Industrial**  
**Property Sales throughout Southern California**  
2221 Rosecrans Avenue, Suite 100, El Segundo, California 90245  
o 310 363 4929 | m 310 686 7255  
[bill.maher@cbre.com](mailto:bill.maher@cbre.com)

California Department of Real Estate License Numbers  
Bill Maher 01080990 | CBRE, Inc. 00409987

This message and any attachments may be privileged, confidential or proprietary. If you are not the intended recipient of this email or believe that you have received this correspondence in error, please contact the sender through the information provided above and permanently delete this message.

From: [Bob Pinzler](#)  
To: [RBHousingElement](#)  
Subject: Error on chart H-8  
Date: Friday, July 9, 2021 10:58:33 AM

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

Percentage share of Married with children in 2019 should be 23% not 29%,

Bob

--  
Bob Pinzler

From: [Barbara Epstein](#)  
To: [RBHousingElement](#)  
Cc: [CityClerk](#); [Bill Brand](#); [Todd Loewenstein](#); [Nils Nehrenheim](#); [Zein Obagi](#); [Brandy Forbes](#)  
Subject: Draft Housing Element Comment  
Date: Sunday, July 11, 2021 12:55:15 PM

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

Please forward my comments to the Planning Commission and GPAC.

Thank you so much for your hard work on this Housing Element.

My hope is that this planning process will be protected from special commercial interests and ill-conceived state government requirements.

To me, the most important thing to include, in all planning, is the “greening up” of Redondo. Over the planning history of our city, past city governments have catered to special developer interests, leaving inadequate front yard, side yard, and backyard setbacks on residential lots. These harmful zoning decisions need to change. This policy has left no space for beneficial trees and other plants that help capture carbon and water, beautify neighborhoods, provide oxygen, and cool the atmosphere throughout the city.

Requiring ample green space and trees as part of every residential building permit will help to remedy the planning mistakes of the past.

Requiring green parkland as a condition of issuing building permits will go a long way to improve air quality and quality of life in Redondo.

One example that comes to mind of good planning is the long-awaited development on Catalina between Diamond and Emerald streets. Preserving the cafe and adding the bakery is brilliant. The design is pleasant, though presently over-crowded. Including generous access and parking is essential. Adding shade trees and green space may reduce the building density a bit, but will go a long way to improve the essential value of the project to the community and for future residents. I am suggesting using native tree and plant species to encourage native bird, pollinating insects, and other species to make themselves at home and thrive.

Please do not hesitate to contact the South Bay Parkland Conservancy for information.

[southbayparks.org](http://southbayparks.org)

Thank you again for all you do and for keeping me posted.

Our city still has a chance, with your help.

Barbara Epstein  
230 The Village #305  
Redondo Beach, 90277  
[justbarb56@gmail.com](mailto:justbarb56@gmail.com)

Sent from my iPad

From: [Nancy Skiba](#)  
To: [Planredondo](#)  
Subject: Affordable housing for 90277 and 90278 should be equally planned.  
Date: Monday, July 26, 2021 7:12:52 PM

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

South Redondo should not be immune to the forced addition of units, while North Redondo gets the full brunt. Come on, man !

~ Nancy Skiba, District 4

Sent from [Mail](#) for Windows 10

From: [Mark Nelson \(Home Gmail\)](#)  
To: [Planning Redondo](#)  
Subject: CEQA Comment on DRAFT 2021-2029 HOUSING ELEMENT: (1) NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION; (2) NOTICE OF PUBLIC HEARING BEFORE THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH  
Date: Friday, August 6, 2021 4:14:09 PM

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The City's published document states " Since this is a policy document, the land use designations and zoning amendments associated with the 2021-2029 Housing Element are not under consideration at this time and the amendments will be processed as part of the City's ongoing and separate update to the Land Use Element of the General Plan (PLANRedondo)."

As such, please place the PLANRedondo CEQA document in to the public record in order that we can comment on the totality of land use designations and zoning amendments. Attempting to execute land use designations and zoning changes one at a time would constitute piecemealing under CEQA, since the policy document and the PLANRedondo document both envision multiple changes.

From: [Laura Emdee](#)  
To: [RBHousingElement](#)  
Subject: Draft Housing Element Comment  
Date: Monday, August 23, 2021 11:56:23 AM

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If the Housing Element has been sent to HCD, what are the purpose of the comments? Where will they go and to what purpose?

Thank you,  
Laura

Sent from [Mail](#) for Windows

From: [Natalie Bennion](#)  
To: [Planredondo](#)  
Subject: Housing needs to go in 90277  
Date: Tuesday, August 24, 2021 11:56:58 AM

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

North Redondo Beach is already doing it's share to accommodate more housing. Please zone 1,245 units in the 90277 part of town. There is availability in areas such as the 50 acre power plant site.



August 25, 2021

Ms. Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard, Suite 500  
Sacramento, CA 95833  
[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)

**Re: Redondo Beach Housing Element (2021-2029)**

Dear Ms. Huntley:

The city of Redondo Beach (Redondo) has spent the last generation fighting development, by right and otherwise. It has downzoned properties to the point that development or redevelopment of more than a handful of units is no longer feasible and often appeals projects to make sure they are developed at significantly below their underlying density.

The Legado Project at 1700 S. PCH typifies the fierce resistance to development in Redondo. First conceived in 2010 as a 180-unit project, the property was cut down by over one third (now 115 units) and is still awaiting permits more than a decade later. Even though Redondo had no intention in allowing the original project to be built and forced it into litigation for several years, it didn't mind including the 180-units in its 5<sup>th</sup> housing element cycle (2014-2021).

Given these dynamics, it's a wonder Redondo even completed 40% (559 of 1,397) of its requirement during the 5<sup>th</sup> cycle. Looking forward, it's hard to imagine how it will meet its 6<sup>th</sup> cycle requirement of 2,490 units without taking proactive steps to update its zoning throughout the city. Redondo's solution thus far has been to push nearly half the requirement (1,210 units or 49% of the total) into the fringes of the city that are highly trafficked and literally at the city's edge. In fact, a quick review of all the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190<sup>th</sup>), shows all of them to be adjacent to other, less affluent jurisdictions. Furthermore, a close review of those overlays shows the probability of any units materializing within them are extremely low. Some examples are as follows:

1. North Tech, a 5 parcel, 14.26-acre site comprised of three property owners and entirely within 250 meters of the freeway. It is the only portion of Redondo east of the 405 and surrounded by the city of Lawndale. Estimated to accommodate over a quarter of Redondo's housing requirements (685 of 2,490 or 28%), the properties include the following:
  - a. a business that has been in Redondo since 1985 and has no intentions of relocating or shutting down; and
  - b. a grocery anchored shopping center owned by a national REIT with no plans of selling or repositioning the property given its 100% occupancy strong roster of 17 tenants including Vons and Petco and no vacancy; and

- c. a national plumbing fixture showroom that has been there for years. Not only is the likelihood of any residential being developed in this area extremely low, but any units developed would pose serious adverse health impacts on its residents.<sup>1</sup>
2. The 6.21-acre South of Transit Center - Industrial Flex site at 2819 182<sup>nd</sup> Street, across the street from the city of Torrance, is planned to accommodate 224 units. The problem with the plan however is the property was purchased by NantWorks in 2019 and intended to house one of its portfolio companies. The company is owned by one of Southern California's wealthiest individuals and has been working with the city on a specific project, which does not include housing, for years.
  3. The South Bay Galleria, a 29.85-acre shopping mall across the street from the cities of Lawndale and Torrance sought entitlements for 650 units only to settle for 300 five years later. In addition to housing, it was entitled for 1,593,144 square feet of retail, office and hotel in January 2019 with groundbreaking anticipated in early 2020. Instead, halfway through 2021, no plans have been submitted to the city for review and no updated project timeline provided. Given the vast impacts of the covid pandemic on retail, significant changes to the project are likely to be requested and fought over in the years to come further pushing back the project.

As evident from the above, Redondo continues to employ the same gimmicks it has used for decades to appear to satisfy state laws while openly disregarding them. If it were serious about housing, it would zone exclusively for residential, not overlays. The reason it has avoided doing so is because eliminating non-residential uses would result incite vocal protest from the property owners, exposing Redondo to the phantom units it hopes to count.

These deceitful tactics of creating illusory housing in congested industrial corners at densities nowhere else available within the city while ignoring changes to most of the city are part and parcel of an entitled electoral body that believes itself to be above the law and beyond reproach. Convenient, if not practical, solutions supplant good policy resulting in suitable locations not being given consideration in and around more affluent parts of the city.

Appropriate alternatives that can be exclusively residential or mixed use are the 1-acre site at 1021 N. Harbor and the 50-acre power plant at 1100 N. Harbor. Both are adjacent to parks, bike paths, beaches and harbors and surrounded by developments ranging from 17.5 to 120 units per acre but were not considered for housing. In fact, the General Plan Advisory Committee was specifically instructed to not propose any zoning for 1100 N. Harbor during the general plan update and yet still, the Planning Commission voted 5-2 to recommend 50% of the site zoned at 30 dwelling units an acre. Not surprisingly, the City Council ignored the recommendation because it realized it could make up units in areas that are not suitable, practical, or even available and in fact, will never exist thus placating the state without in any way helping solve the housing crisis before us.

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<sup>1</sup> Per the American Lung Association, being within 300-500 meters of a highway has show serious health effects on both children and adults. [Living Near Highways and Air Pollution | American Lung Association](#)

1021 N. Harbor has been vacant and unused for years, has no remediation issues, is currently surrounded by housing, and has a willing property owner eager to build housing on the site. 1100 N. Harbor is being cleaned and remediated in anticipation of its closure on or before December 31, 2023, has studies and reports confirming housing could be built on the site within the 6<sup>th</sup> cycle and an eager developer seeking such approvals. One must wonder, if Redondo is open to 909 units on 20.47 acres (North Tech and Industrial Flex) that are occupied, why wouldn't it support the same spread over more than two and a half times as much land that's vacant? One must conclude that 1021 and 1100 N. Harbor were deemed unsuitable because the city knew it would mean real housing units and tangible impacts on today's housing crisis.

Therefore, I strongly urge you to reject the housing element and reprimand the city for its blatant attempt to skirt the law. If it wishes to count the 909 units, it should obtain commitments from the four property owners that they support and will pursue such plans. The concentration and location of the overlays serve as glaring reminders of how disingenuous Redondo's effort really is. HCD should demand the city be more candid with its site selection, fairer to its electorate by spreading development throughout the city and demonstrate that sites planned for housing can actually accommodate them. Lastly, I hope HCD educates the city that housing is better suited in areas surrounded by parks and open space than by freeways and industrial centers.

Sincerely,

A handwritten signature in cursive script that reads "Leo P".

Leonid Pustilnikov

Attachments:

1. Housing Element Update Letter dated May 11, 2021 regarding 1100 N. Harbor
2. Housing Element Update Letter dated May 11, 2021 regarding 1021 N. Harbor
3. Planning Commission Land Use Recommendations dated April 15, 2021

Cc: [RBHousingElement@redondo.org](mailto:RBHousingElement@redondo.org)  
[HousingElements@hcd.ca.gov](mailto:HousingElements@hcd.ca.gov)

May 11, 2021

**VIA ELECTRONIC MAIL**

Mayor Brand and Honorable Members of  
Redondo Beach City Council  
415 Diamond Street  
Redondo Beach, CA 90277

Re: Housing Element Update (RHNA Allocation for AES Power Plant Site at 1100 N. Harbor); Agenda Item N.2, 5/11/21 City Council Meeting

Dear Mayor Brand and Honorable Members of the Redondo Beach City Council:

This office represents the current fee owners<sup>1</sup> of the approximately 50-acre site on which AES operates the Redondo Beach Generating Station (“Power Plant”). As you know, on April 15, 2021, the Redondo Beach Planning Commission voted, 5 to 2, in favor of correcting the general plan designation for the Power Plant site, to mixed use allowing 30 dwelling units per acre for up to 50% of the Power Plant site. The Owners agree with the Planning Commission’s recommendation and welcome the opportunity to discuss with the City Council their plans for future reuse of the site when the Power Plant operations cease.

As it currently stands, the California State Water Resources Control Board (“Water Board”) has exempted the Power Plant site from operation of the Water Board’s new “Once Through Cooling Policy” (“Policy”) through December 31, 2021. AES will continue to operate the Power Plant through that date and further retains the right to seek additional exemptions to allow it to operate through December 31, 2023. As the Water Board has indicated, the amendment to the Policy allowing for this exempted use is, at least in part, necessary for potential backup electric generation for the regional grid.

Owners have begun planning for the ultimate re-use of the Power Plant site. While the General Plan designation previously allowed for economically viable re-uses, on November 2, 2010, the Redondo Beach electorate approved Measure G, creating a new land-use designation of “Generating Plant” (something that did not previously exist and does not exist within the City’s zoning code) which was exclusively applied to the Power Plant site (and no other). Measure G eliminated all economically viable re-uses of the site when the Power Plant operations cease.

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<sup>1</sup> The fee owners of the Power Plant site include 9300 Wilshire, LLC, 1112 Investment Company, LLC, Ed Flores, LLC, 9300 Wilshire Fee, LLC, David Dromy, 1650 Veteran, LLC, Outdoor Billboard, LLC, BH Karka, LLC, 5<sup>th</sup> Street Investment Company, LLC, 505 Investment Company, LLC, SLH Fund, LLC, and Peak Alcott, LLC. Collectively, the fee owners are referred to herein as “Owners.”

Mayor Brand and Honorable Members of  
Redondo Beach City Council  
May 11, 2021  
Page 2

Owners understand the history of the Power Plant site and the myriad land-use tools that were used to shut down the Power Plant operations and effectively convert the site to open space and parklands. These efforts are the subject of a pending inverse condemnation lawsuit filed against the City in which Owners seek just compensation as a result of the City's regulatory taking and spot zoning. (See Cross-Complaint filed in *City of Redondo Beach v. California State Water Resources Control Board*, Los Angeles County Superior Court Case No. 20STCP03193.)<sup>2</sup>

As noted, Owners welcome the opportunity to discuss with the City Council the recommended re-use of the site for mixed use development of 30 dwelling units per acre for the site. As the Southern California Association of Governments ("SCAG") has determined, the City must allow for the construction of at least 2,490 additional residential units in its Regional Housing Needs Assessment ("RHNA"). The City historically has placed most of its planned housing units in North Redondo, removing the ability to develop adequate housing on sites much better suited for residential development. With the impending closure of the Power Plant, the 50-acre Power Plant site represents the prototypical "underutilized" property that State Law has determined should be made available for future development. State law, in fact, compels the City to identify underutilized properties on which local governments may plan for future housing development.

With respect to whether the Power Plant site will be available for housing development by 2028, Owners' consultants have developed a plan and timetable for closure and clearing of the Power Plant facilities by 2027. This assumes that AES may obtain additional extensions allowing for intermittent Power Plant operations through December 31, 2023. Even with this assumed date, Owners are prepared to have a substantial portion of the site cleared allowing for residential development on approximately half the site by late 2025, with the remainder of the site cleared by 2027. There is no question this site qualifies as an appropriate "underutilized property" for which much of the additional RHNA housing units may be accommodated.

Additionally, the sites proposed in the North Tech area of the City are less suitable for redevelopment into housing and may not qualify as part of the RHNA process for the following reasons: i) they are adjacent to industrial uses and freeways which have potentially harmful effects on health;<sup>34</sup> ii) Northrup Grumman, the City's largest employer strongly opposes the overlay as the work conducted and noise emitted from such work make residential occupancy unsuitable in such close proximity; iii) eliminating commercial and industrial areas from the City will only amplify the severe housing jobs imbalance;<sup>5</sup> iv) eliminating business districts will further erode the City's tax base; v) commercial and industrial uses have staggered lease terms that may prevent the sites from being available until well after 2028;<sup>6</sup> and vi) eliminating industrial uses, many of

<sup>2</sup> Approximately 2:36-2:38 into the May 4, 2021 City Council Meeting, the City's own consultant alluded such actions were a taking.

<sup>3</sup> Sites have been analyzed whether historical use precludes residential development or what level of clean up would be necessary.

<sup>4</sup>[http://www.publichealth.lacounty.gov/place/docs/DPH%20Recommendations%20to%20Minimize%20Health%20Effects%20of%20Air%20Pollution%20Near%20Freeways\\_Final\\_March%202019.pdf](http://www.publichealth.lacounty.gov/place/docs/DPH%20Recommendations%20to%20Minimize%20Health%20Effects%20of%20Air%20Pollution%20Near%20Freeways_Final_March%202019.pdf)

<sup>5</sup> While density per zip code and district were analyzed, was school crowding per area ever reviewed?

<sup>6</sup> E.G.: 2701 Manhattan Beach Blvd. (MBB) is on a ground lease expiring 4/1/2044, 2061 MBB and 2420 Santa Fe Ave. were both acquired in

Mayor Brand and Honorable Members of  
Redondo Beach City Council  
May 11, 2021  
Page 3

which are last mile distribution of goods movement will only increase traffic as they would be pushed further away from the households they serve.

The Power Plant site is superior for a mixed use redevelopment that includes the above recommended housing in addition to uses such as office, retail, hospitality, and potentially content production or studio space. A large commercial or mixed use campus would help remedy the housing jobs imbalance of the City and actually ease traffic congestion during rush hour while relying on space capacity from the direction against gridlock.<sup>7</sup> One such development concept the owners are contemplating is as follows:

1. 750 residential housing units
2. 300 key hotel
3. 750,000 square feet of office (up to 20% of which would be studio or production space)
4. 150,000 of retail, restaurant and event space

Again, Owners stand ready, willing and able to discuss an economically viable re-use of the site as appropriately recommended by the Planning Commission. We look forward to working with the City through this Housing Element and General Plan update.

RUTAN & TUCKER, LLP



Douglas J. Dennington

DJD:pj

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2020 by Rexford Industrial, a publicly traded REIT whose business plan generally includes holding industrial assets for a decade or longer.

<sup>7</sup> If residents and pass through traffic is now captured within the City, it will ease the congestion getting out and benefit from the spare capacity from the other direction (e.g. southbound in the AM hours and northbound in the PM hours) coming into the City during rush hour.

May 11, 2021

**VIA ELECTRONIC MAIL**

Mayor Brand and Honorable Members of  
Redondo Beach City Council  
415 Diamond Street  
Redondo Beach, CA 90277  
cityclerk@redondo.org

Re: Housing Element Update (RHNA Allocation for 1021 N. Harbor); Agenda Item  
N.2, 5/11/21 City Council Meeting

Dear Mayor Brand and Honorable Members of the Redondo Beach City Council:

This office represents New Commune DTLA LLC, the owner of the only privately owned fee interest within the Harbor located at 1021 N. Harbor. The approximately 1 acre site is primarily surrounded by multifamily to the north and west and commercial uses to the south and east. The site is at the end of the Strand in Hermosa Beach developed at in excess of 17.5 units per acre and is adjacent to both the Crystal Cove Apartments and the King Harbor Apartments, developed at in excess of 50 units and 100 units per acre respectively.

The site is currently zoned CC-4 with allowed uses including but not limited to retail and restaurant on the ground floor and hotel and office above the ground floor. My client would respectfully like to request that the City Council consider allowing residential uses in addition to the other approved uses for the site at a density of not less than 30 dwelling units per acre. This change would allow my client to plan for the redevelopment of the site in the post-Covid era where more and more people are working from home while at the same time allowing the City of Redondo Beach satisfy its some of its most recent Regional Housing Needs Assessment ("RHNA") requirements.

We thank you for your consideration of this matter and look forward to working with the City through this Housing Element update.

RUTAN & TUCKER, LLP



Douglas J. Dennington

DJD:pj



**From:** Huntley, Robin@HCD <[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)>  
**Sent:** Thursday, August 26, 2021 6:45 AM  
**To:** Sean Scully <[Sean.Scully@redondo.org](mailto:Sean.Scully@redondo.org)>; Brandy Forbes <[Brandy.Forbes@redondo.org](mailto:Brandy.Forbes@redondo.org)>  
**Cc:** Veronica Tam <[veronica.tam@vta-planning.com](mailto:veronica.tam@vta-planning.com)>  
**Subject:** Fw: Resident of North Redondo

HCD is forwarding comments received on Redondo Beach's draft housing element and offers the City an opportunity to respond.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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**From:** Melissa Dagodag  
**Sent:** Wednesday, August 25, 2021 6:50 PM  
**To:** Huntley, Robin@HCD <[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)>  
**Subject:** Resident of North Redondo

I am an attorney and a resident of North Redondo Beach living in a single family house in the Golden Hills neighborhood.

***It's my opinion that the best place to build the proposed high density housing in Redondo Beach is the 50 acre Power Plant that is being decommissioned. Please don't ignore my voice. I am a Stanford University educated attorney who used to be a Commissioner for the City of Santa Monica when I lived there. I care about Redondo!***

Please don't allow the City Council to put housing in sites that are bad for the community when there are large parcels next to the beach, bike paths and parks.

Regards,

Melissa K. Dagodag

The Law Offices of Melissa K. Dagodag  
468 North Camden Drive  
Beverly Hills, California 90210  
Tel.:

Comments to the 2021-2029-Housing Element  
Sheila W. Lamb

Section	Page	Text	Comments
General			it would be helpful to the public if the new additions to the housing element were identified by marking "NEW" next to the narrative.
2.2.1	1	<b>Introduction:</b>	Please add the following paragraph to section 2.2.1 at the beginning of the section. It clarifies for the public the specific purpose for the housing element: The Housing Element is the City's official municipal response to the State Legislature's declaration that adequate housing for all economic segments of the community is a matter of statewide importance that must be addressed by all levels of government.
2.2.1C	2	<b>Public Participation</b>	See Appendix C Below
2.2.2D	22	<b>Homeless-Resources Available:</b>	Please provide a list/table of the resources available in Redondo Beach for the unhoused at the beginning of the paragraph. This section is confusing.
2.2.2D	22	<b>Homeless-Resources Available:</b>	The 2020 Greater LA Homeless Count is used here. There is an updated count for 2021-
2.2.2D	22	<b>Homeless-Resources Available</b>	Please provide clear definitions of emergency shelters, transitional shelters, and temporary shelters. Please list the shelters that are available in RB. This section is confusing.
2.2.2E. Table H22	24	Single family attached units	This section is confusing. Please provide to the public data regarding attached units: for example, what is the distinction between attached units and 2-4 units (which are also attached)? Is single family attached a required category? If this category is not required, the percentage of single family homes would be less than 40%.
2.2.3A	34	<b>Constraints on Housing Production-Government Constraints</b>	
	34	"Redondo Beach residents, however, have become increasingly concerned over the impacts of new housing on neighborhood character, public services, and infrastructure. Consequently, land use controls related to housing and residential development have been strengthened over recent years."	This is a subjective statement based on a consultant's point of view and is not relevant to the heading, "Government Constraints." Please delete this sentence. Redondo Beach residents are interested in providing affordable housing in the community. Please include that in the narrative.
2.2.3A4		<b>Provision for a Variety of Housing Types</b>	

Section	Page	Text	Comments
Table H35-H36	41-42	This table is incorrect regarding RCFE's	Any section in the <b>M/C</b> that allows senior housing by definition includes RCFE's. In sections that list RCFE's only, RCFE's are allowed in that zone but not Senior Housing in the broader term. <b>M/C</b> 10-2.1624 Housing for senior citizens-conditionally permitted in R3, RMD, RH. <b>M/C</b> 10-2.511 Senior housing conditionally permitted reaffirms the above. <b>M/C</b> 10-2.620 Senior housing conditionally permitted in C2A,B,C,PD. <b>M/C</b> 10-2.630 Senior housing permitted conditionally in C3 (as above). <b>M/C</b> 10-2.910 Senior housing conditionally permitted in MU-1, MU-3, MU-3A, MU-3B, and MU-3C mixed-use zones, and CR regional commercial zone. RCFE's are a subset of Senior Housing.
2.2.3A4		<b>Provision for a Variety of Housing Types-Zoning and Land Use</b>	The information in the Housing Element regarding senior housing and RCFE's is confusing and lacks validity. See above comment regarding Table H35.
	46	Residential care facilities for more than six persons are conditionally permitted in the Community Facility zone.	This is incorrect. Please see Comment for Table H35
	47	The City also has a P- CF community facility zone which allows residential care facilities through a conditional use permit.	This is incorrect in that it limits RCFE's to the P-CF zone. Please see Comment for Table H35.
2.2.3A4	48	<b>Provision for a Variety of Housing Types-Senior Housing</b>	The information cited here is incorrect. See Comment for Table H35.
2.2.3A4	48	<b>Provision for a Variety of Housing Types-Emergency Shelters, Transitional Housing, Supportive Housing, SRO's</b>	A table here identifying the types of shelters and the location in RB of each type would provide greater clarity for the public.
2.2.3.B5	61	<b>Liquefaction</b>	"Ground water depths within 30 feet of the ground surface is also a condition necessary for liquefaction to occur. For the City of Redondo Beach, a very high zone of liquefaction susceptibility exists within the coastal area where elevations are less than 30 feet above sea level." Please explain how this is a constraint on housing production.
2.2.3B	61-64	<b>Flooding</b>	From the information provided, there are 15 separate sites that are considered high flood risks. Please consider using a table to list these instead of a narrative. A table will provide greater clarity.
Fig. H2/H3	75-76	<b>Sites Inventory</b>	The public will benefit from viewing a "2021 Existing Land Use Map" in addition to the sites inventory map.
Appendix C	C-1	<b>Public Participation</b>	Please list the public workshops that were held specifically for the Housing Element in which the public was able to ask questions regarding information provided in the Housing Element. If no such workshops were held, please include that no specific workshops were held for the public in the Public Participation section, adding suggestions for public participation during the next cycle.

Section	Page	Text	Comments
Add Appendix		List of legislation mentioned in the text.	Please consider adding an additional appendix: A comprehensive list of all the legislation that is mentioned in the text. This would serve to clarify for the public the extensive nature of the state of California's mandates around housing.
Add Appendix		List of zoning amendments in the text.	Please consider adding an additional appendix: A comprehensive list of the new zoning amendments proposed in the Housing Element.
Add Additional Numbers			Please add additional numbers to headings so that the public can more easily search the document.

From: [Brian Clark](#)  
To: [RBHousingElement](#)  
Subject: Comment on Housing Element  
Date: Thursday, September 2, 2021 11:09:01 PM

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

Dear City Council,

I would like to express my opinion on the proposed Housing Element. I have read the full plan, commented previously, and listened to all City Council Meetings on the topic.

First, knowing how much discussion and work went into the development of this plan and the complexities of any large scale endeavor like this, thank you for all your hard work and dedication.

I have several issues with the current plan:

1) **As far as I can tell there is no mention of the GLBTQIA+ at all in the document.** All other categories of people (ethnicities, family types, and even occupations) receive some mention and supporting data. I suppose we are listed anonymously under "other families." But that is insufficient. As a gay member of the community, I feel very disincluded and overlooked. The GLBTQIA+ community is still fighting to hold onto equal rights that are under constant attack. We regularly have to fight for fair consideration and against prejudice and hate crimes and need to be represented in this document in a formal way. We represent a high percentage of homeless teens. The lack of mention show's the city's lack of understanding, caring and support for this part of the population. I can't speak about the entire city, but in the last two years 2 gay families have moved out our block in Golden Hills. I expect more are out there and should be counted and given the specialized support resources other segments of the population have been given as well. Please feel free to correct me if I missed this information in the long document. A read and a search for LGBT did not turn up any results.

2) **I do not support the placement of the majority of housing in North Redondo Beach, and most specifically the housing adjacent to the 405 freeway.** As a society, we should not be aiming to house the least affluent people in industrial areas or near freeways. This devalues them as people. It harms their health and well being, promotes unhappiness and hurts the greater community. Have you stood near the freeway and experienced the noise and pollution? The least affluent members of our community have enough challenges, without these added stresses and health impacts. This is clearly an area better served by industrial and commercial zoning. I would encourage the Council to think from a human perspective and find housing locations that are suitable for the kind of life that human beings deserve. I know way of thinging will be a departure from the norm, but Redondo Beach has shown itself to be a leader in many areas (like homelessness) and can do so again. Make a plan that is something that truly benefits people. It is the most important and impactful thing the Council can do.

3) **On a broader scope, I am nervous that over-densifying the Northern-most corners of the city will be too impactful a change for one area.** Wouldn't it be better to spread out the development more evenly in smaller parcels? So one corner of the city (that butts up against

other dense regions) is not over developed, while others remain untouched? There was an implication that the Northern corners were closer to transit and so there would be less traffic impact on Redondo by this placement. But just like all of us, life in Redondo moves towards the beaches, west and south. All of these new residents will be travelling (by car mainly) down Artesia and Aviation. Any large-scale density change in one nook of the city is going to have detrimental effects that web out to nearby areas. Spread out the housing so all corners of the city take on their share.

**4) During the City Council debates over this issue (which turned caustic, personal and were very disappointing to watch), viewpoints of some council members were completely overlooked, consensus was not gained and important minority voices were disregarded.** Similarly, it seems that the majority of community reactions to the plan were minimized or ignored. This is a shame and I hope that the Council can find a better way of working together with each other and residents to the benefit of the city. This is an extremely smart Council and I was saddened to see the discussion take a negative turn and to watch as personal grievances obscured the needs of residents. Before this plan becomes a permanent part of your legacy, please find a way to focus solely on the needs of the city.

Once again, thank you so much for all you do. I know each of you and the staff put in way many more hours than you need to and that you are trying to do the impossible. Your hard work and dedication is appreciated and noticed, even if residents like me disagree or have commentary on the decisions made.

All the best.

Brian Clark

From: [Dan Elder](#)  
To: [RBHousingElement](#)  
Subject: Draft Housing Element Comment  
Date: Thursday, September 2, 2021 3:14:18 PM

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It's disappointing that the overwhelming feedback from residents and the Planning Commission was ignored by City Council in identifying Residential Overlays for the required RHNA housing location. Allocating nearly every affordable housing unit in North Redondo through high density housing may satisfy the RHNA but puts a significant burden on infrastructure. A more balanced approach as identified by resident feedback in the Community Workshop (April 7, 2021), Social PinPoint (April 7 April 11, 2021), Planning Commission Meeting (April 15, 2021), and even City Council Meetings (April 20, May 4, May 18, and June 15, 2021) would be preferable. While I realize none of our locally elected officials support the RHNA methodology and the impact this much added housing will have, it really appears that the feedback from residents north of 190th was completely ignored in this process.

Thank you,  
Dan Elder



From: [Barbara Epstein](#)  
To: [RBHousingElement](#)  
Subject: Draft Housing Element Comment  
Date: Thursday, September 2, 2021 12:17:25 PM

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

Thank you so much for all your work on this.

In spite of state requirements, my view is to preserve and create as much open space and parkland as possible. Greenspace does much to capture water run-off, add ambience, and provide important recreational opportunities for our citizens.

Redondo Beach has suffered from too much density zoning to begin with, so we should minimize density as much as possible in residential neighborhoods. Commercial corridors would be greatly improved with imaginative design.

It is critical to increase the tree canopy in the city, insuring healthier air quality, capture carbon, provide shade, and create habitat and beauty around every neighborhood.

Thank You

Barbara Epstein  
SBPC  
RBCG Committee

Sent from my iPad

**Comments on City of Redondo Beach: 2021-2029 Housing Element (June 2021)**

From: Gregory McGinity (1916 Carnegie Lane #C, Redondo Beach, California 90278)

Date: September 2, 2021

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**SUMMARY**

I would strongly urge the Redondo Beach City Council and the Redondo Beach Planning Commission to reject the *2021-2019 Housing Element (June 2021)*. Due to a severe lack of water, the City of Redondo Beach is not in a position to adopt any plan that calls for additional housing. Instead, the City of Redondo Beach should put in place a system similar to that found in the City of Cambria, which does not allow for additional housing to be developed without additional water. In the City of Cambria, where there has been a long-standing water shortage, the County has imposed a “growth management” ordinance that limits annual issuance of building permits based on access to water.<sup>1</sup>

**BACKGROUND: 2021-2029 Housing Element**

On pages 66-67, the *2021-2029 Housing Element* states the following:

“The City of Redondo Beach receives its water service from the California Water Service Company (CWSC), an investor-owned public utility whose operations are regulated by the State of California Public Utilities Commission (PUC). The California Water Service Company has been providing water service to the City since 1927. For operational and maintenance purposes, the City of Redondo Beach is classified within the Hermosa-Redondo District, an area containing all of the City of Hermosa Beach, all of the City of Redondo Beach, and an 800-acre portion of the City of Torrance located directly south and southwest of the City of Redondo Beach. All water supplied to and used in the City of Redondo Beach comes from one of two sources.

- 1) Water purchased by the California Water Service Company from the larger, regional Metropolitan Water District (MWD). This water is pumped into the city through four MWD connector lines.
- 2) Water pumped up from local groundwater sources by the California Water Service Company through a series of three wells located in the far north end of North Redondo Beach.

Approximately 85 percent of the water supplied to the City of Redondo Beach is purchased from the MWD, while approximately 15 percent is pumped up from groundwater sources through wells in the city. The California Water Services Company reports that it is presently meeting all of the district’s existing water service needs and the vast majority of its systems pipes are in better than average conditions. According to CalWater’s Urban Management Plan, water demand in the Hermosa-Redondo District is

anticipated to reach 14,778 AFY (Acre Feet Per Year) in 2040. The water supply is projected to be 14,967 AFY in 2040. **Therefore, adequate water supply is available to accommodate the City's housing needs through 2040**, well beyond the current RHNA planning period.

The facts of our current environmental and water circumstances, including the recent report from the Intergovernmental Panel on Climate Change (IPCC), recent announcements from several California agencies, and the challenges confronting the Colorado River Compact all belie this statement. I believe if the City Council and Planning Commission were to carefully review the current status of the City of Redondo Beach's water supply, you will find that we do not, in fact, have anywhere enough water to accommodate the City's housing needs through 2040.

To the contrary, I would argue that the City of Redondo Beach does not have nearly enough water to accommodate the City's current water needs without severe restrictions. Any new housing approved in the City will require additional water rationing on the part of current residents. As it is the City Council's primary purpose to protect and support the current residents of Redondo Beach, such a policy and the *2021-2029 Housing Element* should be rejected.

### **BACKGROUND ON IMPACT OF CLIMATE CHANGE ON CALIFORNIA'S AND REDONDO BEACH'S WATER SUPPLY**

According to the federal National Aeronautics and Space Administration (NASA), "global warming is expected to make droughts more severe in the future. Even in "low emission" climate scenarios (forecasts that are based on the assumption that future carbon dioxide emissions will increase relatively slowly), models predict precipitation may decline by 20-25 percent over most of California, southern Nevada, and Arizona by the end of this century. Precipitation declines combined with booming urban populations will present a significant challenge to Western water managers in the near future."<sup>ii</sup>

This finding is echoed in the recently released report from the IPCC, which indicated that, "Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation and the severity of wet and dry events."<sup>iii</sup> That is, the continued global warming is intensifying the challenges related to droughts, such as the one we have been experiencing in California.

It is clear that climate change will put significant stress on Redondo Beach's current water supply.

### **CURRENT AND FUTURE WATER RESOURCES**

Cal Water has provided high-quality water utility services in the Hermosa Redondo area since 1927. The Hermosa-Redondo system serves customers in the cities of Hermosa beach, Redondo Beach, and portions of Torrance. To serve the customers in this area, Cal Water uses a combination of local groundwater and surface water purchased from the Metropolitan Water District of Southern California (MWD), which is imported from the Colorado River and the State Water Project in northern California.<sup>iv</sup>

To reiterate, as indicated in the *2021-2029 Housing Element*, 85 percent of the water we need comes from the MWD. The MWD doesn't produce any water, so where does it come from?

According to the MWD, 45% of their water comes from "Local Stormwater, Groundwater, Recycling, and Desalination." 30 percent of the MWD water comes from "the State Water Project" and 25% of the MWD water comes from "the Colorado River Aqueduct."<sup>v</sup> So 46.8 percent, or nearly half, of the water we receive in the City of Redondo Beach comes from the State Water Project and the Colorado River Aqueduct.

I think we would agree that if the sources of almost 50 percent of our water needs were not able to supply our water that would be a problem for current Redondo Beach residents and not provide any opportunity for new housing. Yet, that is where we find ourselves today. If we conduct a careful analysis of the status of both the State Water Project and the Colorado River, one cannot help but see the water supply for the City of Redondo Beach is in a perilous condition.

### **BACKGROUND ON THE STATE WATER PROJECT**

In March of this year, the California Department of Water Resources (DWR) announced an adjustment to its initial State Water Project allocation for the 2021 water year. "The department now expects to **deliver 5 percent of requested supplies this year**, down from an initial allocation of 10 percent."<sup>vi</sup> The Director of DWR stated, "We are now facing the reality that it will be a second dry year for California and that is having a significant impact on our water supply."<sup>vii</sup> The ongoing megadrought that we are facing in California will have significant and long-term negative consequences on the ability of the State Water Project to supply the MWD with the water it is counting on, which means the MWD will likely not be able to provide Redondo Beach and other cities in Southern California with the water we all need.

### **BACKGROUND ON THE COLORADO RIVER**

There has been a two-decade-long megadrought along the Colorado River. In August 2021, low water in the Colorado River's largest reservoir triggered the first-ever federal declaration of a Tier 1 shortage. According to the United State Bureau of Reclamation, which manages the water that the seven states (40 million people) use from the Colorado River, water in Lake Mead, which is one of the largest reservoir's that feed the water systems in the western United States, was about 35 percent full.<sup>viii</sup> While California does not lose any water under a Tier 1 shortage, if trends continue, it will be only a matter of time before California will begin to lose water from the Colorado River that flows into the MWD system that then flows to Redondo Beach.

It is important to recognize that the current Colorado River Compact, which governs the allocation of water, will have to be re-negotiated in 2026. If the drought continues to worsen, which given the previous twenty years of data is highly likely, California will likely experience a cut in its allocation, which means the MWD will see a reduction in its allocation, which means Redondo Beach will see a reduction in its allocation.

According to the environmental organization the Glen Canyon Institute, it is clear that the "Colorado River Basin is facing a water supply crisis...the growing demand (for water), the

relentless shortage (of water), and climate change are creating an average water deficit of almost 1 million acre-feet per year in the Colorado River System.”<sup>ix</sup>

According to the U.S. Department of the Interior, since 2000, the Colorado River Basin has experienced the driest 16-year period in over 100 years of historical natural flows (Bureau of Reclamation, 2015). This period also ranks as the fifth driest 16-year period in the last 1,200 years (Meko et al., 2007a and 2007b).<sup>x</sup> By all accounts, the idea that in the near term the MWD can continue to count on the usual allocation of water from the Colorado River is foolhardy. The idea that the MWD can count on the usual allocation of water from the Colorado River through 2040, which is the statement in this report, is laughable.

### **ADDITIONAL BACKGROUND**

Many experts believe that climate change has created a situation in California and in the west that is past a drought and moved to aridification – a long-term, more permanent desiccation of the region. According to Jay Lund, the co-director of the Center for Watershed Sciences at the University of California at Davis, “We are in worse shape than we were before the last drought, and we are going to be in even worse shape after this one.”<sup>xi</sup> We know that three-quarters of California is already experiencing extreme drought. Governor Gavin Newsom declared a drought emergency in 41 counties.<sup>xii</sup>

The Sierra Nevada snowpack, which provides about a third of California’s water, dwindled to 5 percent of average in May of this year. This equaled April 2015’s record-low percentage. According to a CalMatters article these changes signal “trouble for California reservoirs.”<sup>xiii</sup>

Given these current circumstances, it would not be surprising if the State of California were to mandate more than the 25 percent cut in water usage that the State Water Resources Control Board implemented in 2015.<sup>xiv</sup>

As for the future, according to the California Department of Water Resources, “Climate change is expected to impact our supply and demand for water in critical and non-complimentary ways. Earlier and decreased runoff can reduce water supplies, even when overall rainfall remains the same. This trend could mean less water available for agriculture, the environment, and a growing population (NOTE: such as for additional housing in Redondo Beach.) Decreased snowpack is a critical concern. Warmer temperatures will lead to higher snow levels and cause what snow we do get to melt faster and earlier, making it more difficult to store and use. This loss of snowpack means less water will be available for Californians during the hot summer months. At the same time, water demand is expected to grow as higher temperatures and a longer growing season increase the demand for water.” In addition, they believe that “Past patterns can no longer be used to confidently forecast the future.”<sup>xv</sup>

### **CONCLUSION**

It seems clear from all the available data it is unlikely, or at least highly questionable, that the MWD will be able to supply the water Redondo Beach needs for its current residents. The City of Redondo Beach rather than planning for additional housing development for which there will be no water needs to be strategizing on how it will manage the coming water shortage.

In analyzing the data, the key question that must be asked is do we think the current water situation will get better (i.e., more rain, more snow, Lake Mead and Lake Powell will be filled, etc.), or, more likely, will the situation get worse (i.e., climate change intensifies the current drought, the State of California imposes harsh water cuts, etc.)? If you believe the situation will get worse, and I suggest that is what the data indicates, then it would be foolhardy and a dereliction of duty for the City Council and the Planning Commission to approve this plan. I strongly urge a rejection of this plan.

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<sup>i</sup> <https://www.cambriacsd.org/water-service-faqs>

<sup>ii</sup> <https://earthobservatory.nasa.gov/world-of-change/LakePowell>

<sup>iii</sup> [https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_Full\\_Report.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf)

<sup>iv</sup> <https://www.calwater.com/facebook-page/>

<sup>v</sup> <https://www.mwdh2o.com/planning-for-tomorrow/securing-our-imported-supplies/>

<sup>vi</sup> <https://water.ca.gov/News/News-Releases/2021/March-21/SWP-Allocation-Update-March-23>

<sup>vii</sup> <https://water.ca.gov/News/News-Releases/2021/March-21/SWP-Allocation-Update-March-23>

<sup>viii</sup> <https://www.washingtonpost.com/nation/2021/08/16/colorado-river-water-cuts-drought/>

<sup>ix</sup> <https://www.glencanyon.org/fill-mead-first/>

<sup>x</sup> <https://www.doi.gov/water/owdi.cr.drought/en/>

<sup>xi</sup> <https://calmatters.org/environment/2021/05/unprepared-california-drought-2021-lessons-learned/>

<sup>xii</sup> <https://www.gov.ca.gov/wp-content/uploads/2021/05/5.10.2021-Drought-Proclamation.pdf>

<sup>xiii</sup> <https://calmatters.org/environment/2021/05/unprepared-california-drought-2021-lessons-learned/>

<sup>xiv</sup>

[https://www.waterboards.ca.gov/water\\_issues/programs/conservation\\_portal/docs/factsheet/implementing\\_25percent.pdf](https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/factsheet/implementing_25percent.pdf)

<sup>xv</sup> <https://water.ca.gov/Water-Basics/Climate-Change-Basics#:~:text=Climate%20change%20is%20expected%20to,environment%2C%20and%20a%20growing%20population.>

From: [Chris Ahearn](#)  
To: [RBHousingElement](#)  
Subject: Draft Housing Element Comment  
Date: Friday, September 3, 2021 7:26:20 AM

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It is very difficult to see the maps on the draft. Printing them out wastes so much ink for residents, plus they are no clearer when you do that. Your office kindly emailed copies, but the quality was the same, poor. Phone calls to receive better copies went unreturned. As a homeowner in Redondo, I don't feel I have enough information to comment intelligently, and that's a shame. The document is lengthy and quite detailed, and shows evidence of a lot of work, but it does not specifically answer how this plan will affect current homeowners, and it should.



From: [peter aziz](#)  
To: [RBHousingElement](#)  
Subject: Draft Housing Element Comment  
Date: Friday, September 3, 2021 6:39:22 PM

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The Housing needs to be equally distributed throughout all of Redondo Beach, not just absorbed by one or two of the highest densest districts. Ignoring the public input of nearly 500 residents is a sheer dereliction of duty and equal representation. To move forward and place some of the housing elements in the most undesirable locations in a corridor deemed unfit for housing according to the 2005 AQMD air quality guidelines further demonstrates ignorance on behalf of the council representative and as well as the coercion of the planning department. I certainly hope that the planning department both on staff and on commission understands the impact on quality of life and health which this particular zoning near the freeway can be affected by.

While the council representative so ignorantly cited and stated this article.

<https://www.vcstar.com/story/news/2018/01/01/regulators-shift-views-housing-near-warned-against-housing-near-freeways-due-health-risks-now-theyre/986355001/>

He failed to acknowledge the articulation and competence behind such said studies and missed the exact title of this article <https://www.latimes.com/local/california/la-me-freeway-homeless-housing-20171217-htmlstory.htm>

## **California officials say housing next to freeways is a health risk — but they fund it anyway**

Which Further states the reasoning behind why such poor choices in funding and approving the housing elements in D5 near a freeway are in fact undesirable and hazardous simply equating strategic alterations of air filtration systems and proper greenery will suffice to improve the quality of life that Many of the south Redondo council and residents so flagrantly claim to state "beachlyfe" lifestyle.

[http://ph.lacounty.gov/place/docs/DPH%20Recommendations%20to%20Minimize%20Health%20Effects%20of%20Air%20Pollution%20Near%20Freeways\\_Final\\_March%202019.pdf](http://ph.lacounty.gov/place/docs/DPH%20Recommendations%20to%20Minimize%20Health%20Effects%20of%20Air%20Pollution%20Near%20Freeways_Final_March%202019.pdf)

The 2005 AQMD study states on **16 different pages** how increased health risks for lower-income households have risen as contributing factors to poor land-use mitigation occurs on behalf of the biased and unequal representation of incompetent elected officials making those

choices on their behalf.

"The highest cancer risk occurs in south Los Angeles county -- including the port area -- and along major freeways. " (<http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf>)

Please consider removing this motion of the housing element to be appropriately and equally distributed throughout the entire city.

From: [Alisa Beeli](#)  
To: [RBHousingElement](#)  
Subject: Redondo Beach Housing Element comments  
Date: Friday, September 3, 2021 7:40:32 PM

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

Dear Redondo Beach Housing Element,

I am a resident of Redondo Beach and would like to submit the below comments to the Redondo Beach Housing Element 6th cycle plan.

I strongly urge you to reject the Housing Element plan for the following reasons:

- The Housing Element plan approved by the Redondo Beach City Council places nearly all (94%) of the required units in the North/90278 zip code (2,340 of the 2,490 required units). This is blatantly unfair to the residents of North Redondo and the required housing should be distributed throughout all of Redondo Beach, including the South/90277.
- The plan places nearly all of the newly zoned parcels into the edges of the city, areas that are highly trafficked and bordering surrounding cities such as Lawndale and Torrance which of course have their own housing requirements. This will not solve our housing issues, it will exacerbate them.
- All of the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190th) are adjacent to less affluent areas of the city, all in North Redondo/90278. By contrast, the plan does not provide increased housing in the more affluent, beach-adjacent, communities of South Redondo/90277. My understanding is that state law prohibits the concentration of low income housing in one location, and that it must be distributed throughout the city. I do not understand why the Housing Element plan can even be considered in its current state.
- The North Tech area is estimated to accommodate 28% (685) of the required units on its own. The current property owners on that parcel include a business and grocery anchored shopping center with no plans of relocating. It is also in close proximity (within 250 meters) of the 405 Freeway. Not only is the likelihood of any residential units being developed in this area extremely low, but any units developed would pose serious adverse health impacts on its residents. The residents of this area would also have a roughly 45-minute commute to the one high school in Redondo Beach.
- There are alternative options in South Redondo/90277 that were not considered by the City Council. Those include the 1-acre site at 1021 N. Harbor and the 50-acre power plant at 1100 N. Harbor. The power plant location is being cleaned and remediated in anticipation of its closure by the end of 2023. It is also adjacent to parks, bike paths, the beach and the high school. South Redondo options were largely ignored by the City Council, even though the Redondo Beach Planning Commission voted 5-2 to recommend 50% of the power plant site zoned at 30 dwelling units per acre.
- Redondo Beach completed 40% (559 of 1,397) of its 5th cycle RHNA. Given the issues of the 6th cycle plan, it's difficult to imagine how Redondo Beach would meet its requirement of 2,490 units without taking proactive steps to update its zoning throughout the city.

Placing the majority of new housing units in North Redondo/90278 near freeways and industrial centers does not seem realistic or equitable. I am concerned about traffic and over-crowding at North Redondo schools, if this Housing Element were ever to be implemented.

I am also concerned that the hundreds of public comments and emails to the City Council and Mayor regarding the issue of placing the majority of units in North Redondo have been entirely ignored.

Please listen to our concerns and evaluate the plan with the idea of better distributing housing throughout the entire City of Redondo Beach, not just the North.

Thank you for your time and consideration.

From: [Mariam Pashtoonwar](#)  
To: [RBHousingElement](#)  
Subject: Draft Housing Element Comment  
Date: Friday, September 3, 2021 7:51:18 PM

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

Hello,

I am a resident of North RB in D4, and am requesting the housing be evenly distributed throughout the city to minimize impact to one particular district. D4 is already the second densest district, if not the most, and we cannot accept the majority of housing. We need to consider the impact on our schools and resources. Additionally, low income housing should certainly be distributed equally throughout Redondo to ensure housing equality.

Thank you,

Mariam P. Butler DPT  
Sent from my iPhone

From: I  
To: [RBHousingElement](#)  
Cc: [HousingElements@hcd.ca.gov](mailto:HousingElements@hcd.ca.gov); [info@fairhousingelements.org](mailto:info@fairhousingelements.org)  
Subject: Segregation is NOT normal, it's an act of systematic violence against civilians that is still be committed today!  
Denying housing is an act of violence!  
Date: Friday, September 3, 2021 11:29:19 PM

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We must build more affordable housing in ALL neighborhoods across Redondo Beach! The working class, seniors, students, those with low or no income, and many others all deserve safe, clean, and affordable housing. Segregation is NOT normal and the coastal cities have been absolutely violent in the displacement of **lower-income and black residents specifically!**

Denying housing that residents can afford is an act of violence and as a friendly reminder, the state can capture public land from local cities refusing to comply with the housing element. **LA County residents have been requesting more affordable housing for over 10 years now, we've been patient long enough!** It's time to return affordable housing, both rent and homeownership, to the working class, seniors, students, & many others in need!

**Poverty is a failed policy choice!** We don't need local jurisdictions upholding illegal segregation as it relates to race & class, as I said it's illegal, and cities can be sued for it! **We MUST build more housing in ALL communities across Redondo Beach especially as SFZ comes to an end!**

--

Best,  
Tieira

[www.HTWWS.org](http://www.HTWWS.org)



**((Matthew Lewis))** has some... · 7h ...

Replying to [@constans](#)

[@HowTheWestWS](#) and [@schroedinger\\_](#)

We don't have a "housing market" in California, by any sense of the term. We have a cartel of city governments who openly and proudly conspire to limit the supply of housing.

**car·tel** | kär'tel | noun

• an association of manufacturers or suppliers with the purpose of maintaining prices at a high level and restricting competition



**8%** of the overall population is Black, but Black people represent

**34%** of those experiencing homelessness.

#BlackHistoryMonth





**Vaccinated** **Masked** **Pr...** · 13h ...

We don't have to have a landlord/tenant model of housing. Let's start there.

80 1,334 7,775



**Vaccinated** **Masked** **Pr...** · 13h ...

This is another example of how European colonization operates to limit our imagination of what is possible in terms of how we exist as a human civilization. The whole model of landlords & tenants is an export of the European feudal system. We don't have to keep it.



**Vaccinated** **Masked** **Pr...** · 13h ...

Replying to [@BreeNewsome](#)

We're talking about a situation where white colonizers stole vast amounts of land they continue to occupy and charge us rental fees for. The origins & underlying structures of the system make it impossible for justice or fair access to exist.













From: [mjteola@aol.com](mailto:mjteola@aol.com)  
To: [RBHousingElement](#)  
Subject: Draft Housing Element Comment  
Date: Friday, September 3, 2021 9:09:18 PM

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

Good Evening,

I briefly scanned this document. The document is very thorough and it is evident that a lot of research went into the preparation and organization of data.

I am disappointed in the timelines. I received the email regarding this document yesterday, and the comments were due today, September 3. I did attend two meetings of the General Plan and participated in the "Pinpoint" Survey. I notice there were meetings in April, in addition to discussions at City Council. I was not aware of other discussions of the Plan. If you truly want public input, I would suggest that you notify residents in a timely matter so they can actually participate. In scanning the document, which is rather long, I would suggest, that a summary be attached as to the main points. How will the city of Redondo Beach be impacted by the recommendations in this document?

Though I did not have as much time as I would have liked to review the document and ask clarifying questions, I do not understand how a single family residence in District 3 can be compared to a single family residence in District 1. How can these possibly be the same? One chart seems to indicate the height of the homes are 30 feet and two-story. If that is the case, why are there two-story homes with a third floor?? Is this a change in the building code? I am proposing that a meeting, zoom meeting, be scheduled to discuss the plan in terms that the average citizen can understand. In addition, Beach Cities Health District is located in Redondo Beach. Why is that not addressed in the Plan. My understanding is the the deed to the property indicated it is to be used for a hospital? Have other plans been made for the usage of this land?

Sincerely yours,

Marianne Teola

From: [Gabrieleno Administration](#)  
To: [Sean Scully](#)  
Cc: [Anna Millar](#); [John Torres](#); [Lina Portolese](#); [Luci Hise-Fisher](#); [Matthew Teutimez](#); [Matthew Teutimez](#)  
Subject: Re: City of Redondo Beach Housing Element Update - AB 52 and SB 18 Tribal Consultations  
Date: Friday, July 23, 2021 2:47:56 PM

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

Hello Mr. Scully,

This is Mr. Salas , I want to thank you for your email . Please note we are fine with your housing element update however if there is any anticipated construction or ground disturbances at this location in the mere future we would like to consult per AB52 and SB18. Thank you for your time and consideration.

On Fri, Jul 23, 2021 at 2:06 PM Sean Scully <[Sean.Scully@redondo.org](mailto:Sean.Scully@redondo.org)> wrote:

Hello Matthew, Andy, and Brandy,

Thank you very much for taking my call Brandy! I really appreciate it!

I'm following up with this brief email per our call.

Look for a couple letters per AB 52 and SB 18 to be submitted to your office, electronically, in the next couple weeks informing you of the City's release of a CEQA document, Initial Study Negative Declaration, prepared in support of the City's Housing Element Update.

Per our call we'll look forward to your email back noting that the City's Housing Element document (policy document), as it does not include any ground disturbance activities, will not require formal consultations with your Tribe.

Thank you in advance! Looking forward to working with you again!

Sean Scully

Planning Manager

Community Development Department, Planning Division

[415 Diamond Street](#), Door "2"

Redondo Beach, CA 90277

Tel 310-318-0637/1+2405

Fax 310-372-8021

[sean.scully@redondo.org](mailto:sean.scully@redondo.org)

[www.redondo.org](http://www.redondo.org)

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Admin Specialist

Gabrieleno Band of Mission Indians - Kizh Nation

PO Box 393

Covina, CA 91723

Office: 844-390-0787

website: [www.gabrielenoindians.org](http://www.gabrielenoindians.org)



*The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. “The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area “. “That’s a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.”*



**From:** Mark Nelson

**Sent:** Friday, September 10, 2021 7:17 PM

**To:** Brandy Forbes <[Brandy.Forbes@redondo.org](mailto:Brandy.Forbes@redondo.org)>

**Subject:** Fwd: Draft Housing Element Final IS/ND and Planning Commission Report Now Available



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I have yet to review the full policy document, but the path forward to PlanRedondo and this particular Neg Dec look perfectly reasonable. Thanks!

**From:** Mark Nelson

**Sent:** Monday, September 13, 2021 12:56 PM

**To:** Brandy Forbes <[Brandy.Forbes@redondo.org](mailto:Brandy.Forbes@redondo.org)>

**Cc:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>

**Subject:** Public Comment to Planning Commission Upcoming Meeting on RESOLUTION NO. 2021-\*\*-PCR-\*\*



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

Commissioners and Director:

The Commission's resolution labeled RESOLUTION NO. 2021-\*\*-PCR-\*\* contains a material inaccuracy regarding the outreach effort. Specifically, it states that "groups" such as BCHD were contacted. BCHD is a government district, not a group. Furthermore, BCHD has an organizational self interest as it attempts to develop a 133-foot above the street, nearly 800,000 sqft development that is roughly the size of Staples Center. BCHD also made materially inaccurate comments in public that its project could qualify for RHNA, which is objectively false for a facility charging \$7,500 to \$12,500 per month rent for senior living. As such, it is clear that BCHD was simply posturing for its project, which will be 100% commercially constructed and operated, and 80% owned by commercial entities. Therefore, BCHD comments are no different than any commercial comment and must be accurately represented.

Mark Nelson  
3+ Year BCHD Volunteer  
Redondo Beach

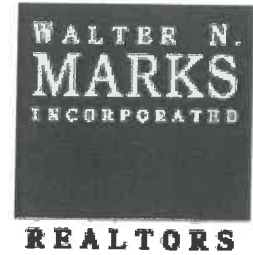
cc: Public Comment City Council Meeting

From: [Mike Martin](#)  
 To: [RBHousingElement](#)  
 Subject: RE: Draft Housing Element Final IS/ND and Planning Commission Report Now Available  
 Date: Saturday, September 11, 2021 4:49:43 PM  
 Attachments: [6528A10EE5074B919A77E5B4A7E4E8D2.png](#)

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“Description” needs to be edited to match “density/intensity” column in Draft Land Use Definitions. Especially in PI and OS.

Land Use Category	Density/Intensity	Description
<b>PUBLIC / INSTITUTIONAL / OPEN SPACE</b>		
Public/Institutional (PI)	Max. FAR <del>1.25</del> 0.75 FAR (1.25 FAR at City Hall bounded by PCH, Broadway, Carnelian St, and Diamond St; 1.25 FAR at the Annex site on Northeast Corner of PCH and Vincent St) (subject to Planning Commission Design Review)	Provides for governmental administrative and capital facilities, schools, libraries, hospitals and associated medical offices, public cultural facilities, and other public uses <del>including residential-care facilities for the elderly</del> , ancillary parks, recreation and open spaces. <i>Maximum FAR 1.25 (subject to Planning Commission Design Review).</i>
Public/Utility (U)	Max. FAR 0.10	Provides for utility uses including easements with public access for recreation and parking. <i>Maximum FAR 0.10.</i>
Parks and Open Space (OS)	Max. FAR <del>[0.25]</del> 0.20	Provides for public open space, passive park uses, sports fields, active recreation uses, and coastal-related recreational activities as well as accompanying public facilities such as restrooms, picnic pavilions, parking facilities, and lifeguard towers. <i>Maximum FAR 0.25.</i>



**Redondo Beach**  
*Housing Element Document*  
*Planning Commission – Item J.3*

September 15, 2021

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**I support this Housing Element document** as it is concerned with specifically identifying ways in which the housing needs of existing and future resident populations can be met. Moreover, the focus on improving existing affordable housing, finding developments for affordable housing, and promoting equal housing opportunities, all the while, removing governmental and other constraints to housing development, in general, is laudable.

I hope this body will keep in mind that these policy decisions will only be achieved, and thus realized in the built environment, through updated zoning and the soon-to-be created Inclusionary Housing Ordinance.

If yesterday's zoning continues to dictate, and thus limits the ability for architects and property owners to imagine new ways to build (read: climate resiliency), adapt to work-from-home phenomenon, and make Redondo Beach the most desirable place to live, work and play.

Further, incentive based policies that enhance the construction of affordable units throughout Redondo Beach will be imperative to nudge property owners to extend themselves and include affordable units. I have witnessed firsthand that lack of built affordable units because the incentives fell short.

In the months and years ahead, this body and the City Council has the ability to craft forward-thinking policies ensuring that the new housing (of all types and income levels) to be built in our City will benefit the residents, then the community and thus the City through the economic development that it all incites.

Thank you.

A handwritten signature in blue ink that reads "Wally Marks". The signature is fluid and cursive, with a long horizontal stroke at the end.

---

Wally Marks  
Property owner: 2810-2860 Artesia Boulevard



[Read about the coalition here](#)



JOHN JACKSON



ABUNDANT HOUSING LA



Ending Isolation and Homelessness in Hollywood

THE CENTER



LACBC



DISABILITY COMMUNITY RESOURCE CENTER



Building a Movement in the Eastside



GREATER LOS ANGELES



September 14, 2021

Redondo Beach City Council  
 Redondo Beach City Hall  
 415 Diamond Street  
 Redondo Beach, CA 90277

Dear Councilmembers:

**Why does this matter?** Because we face a cascade of housing crises in our region. And while nearly everyone in Los Angeles County feels the crush of our housing crisis, Black and Latino residents feel it more than most:

- Black households have 1.12% the wealth of white households, and Latino households less than 5% (Federal Reserve Bank of San Francisco)
- Black people make up 8% of the county population, but 33.7% of people experiencing homelessness (LAHSA)
- Even under COVID-related eviction moratoriums, Black and Latino neighborhoods face disproportionately higher eviction threats (Los Angeles Times, UCLA)
- One in four AAPIs pay more than half of their income toward housing costs compared to whites (16 percent), putting many on the edge of financial vulnerability. This segment of the population is considered severely cost-burdened (Crisis to Impact Report, A joint publication of the National Coalition of Asian Pacific American Community Development and the University of California, Los Angeles)

These are the effects of decades of racist policies that we have not eradicated: Restrictive covenants, exclusionary zoning, and redlining made it impossible for Black families to build wealth through homeownership, and result in lower homeownership and higher rents today. The California Constitution's Article 34 and local "crime-free housing" policies put roadblocks in the way of addressing racial divisions in Californians' housing affordability and security.

This impact was felt devastatingly during the pandemic, when essential workers living in overcrowded housing were exposed to COVID at work and had no choice but to expose their families at home, leading to disproportionate deaths among Black and Latino people. Neighborhoods in South and Southeast LA, where nearly 20% of homes are overcrowded (defined as more than one person per room) had COVID rates of roughly 14,000 cases per 100,000 people. Neighborhoods on the Westside, where less than 5% of homes are overcrowded, had rates well under 5,000 cases per 100,000 people.<sup>1</sup> Death rates were similarly disproportionate -- at a time (January 2021) when the city of Beverly Hills was reporting 21 COVID deaths, and the neighborhood of Brentwood 9, the city of Compton reported 147, and the neighborhood of Westlake 202.<sup>2</sup> In all, COVID-19 mortality rates in LA County were roughly twice as high for Black people (31 deaths/100,000 individuals) and Latinos (29/100K) as for whites (15/100K) (from CGLA).

Of the 3,007 counties in the United States, L.A. County ranks last in housing affordability, overcrowding, and unsheltered homelessness. We are not doing enough to preserve and create homes for working class and lower-income people. The affordable housing crisis, rampant speculation, lack of tenant protections and rent control, and affordable housing shortage have gotten so bad that lower-income Black, Latino and AAPI families are being pushed out of their homes and communities at an alarming rate. At the rate we're going, next generations won't be able to live in Los Angeles County.

Los Angeles County is legally required to build 341,000 affordable homes by 2030. [To truly address our needs, we need more than double that.](#) At the rate we're going today, we might build 25,000. That's 7% of what's needed. That kind of failure will fall hardest on Black and Latino families, who disproportionately face eviction, homelessness and having to choose between rent and food. Our Future LA demands we not let that happen.

In order to create a better housing future, we must make every neighborhood resource-rich so people can live where they want to live and don't have to leave their community to find opportunity. The Housing Element must also consider the intersection between housing, public health, and environmental justice. The very communities facing the highest rent burden are often the same communities who bear the brunt of the negative impacts brought on by environmental contamination and exposure to the worst air and soil qualities. For example, in LA County, 75% of active oil wells are located within 2,500 feet of homes, the vast majority of which are occupied by low-income people of color. We must also achieve equitable land use and zoning so that historically exclusionary communities build at greater densities, with value

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<sup>1</sup> ["When coronavirus invaded their tiny apartment, children desperately tried to protect dad". LA Times. 1/29/21](#)

<sup>2</sup> ["We Are Forced to Live in These Conditions': In Los Angeles, Virus Ravages Overcrowded Homes". NY Times. 1/23/21](#)



capture, while also ensuring that areas already zoned for density are protected from environmental and spatial racism and displacement pressures. As the region plans for growth, there must be no conversion of wildlife habitat to housing or further development in wildfire hazard areas, as identified by CalFire. We understand that Redondo Beach cares deeply about these issues, and we hope to offer assistance in addressing them.

As it stands right now, the draft housing element will not meet Redondo Beach's goals around equity and affordability. We submit these comments in the spirit of collaboration in order to partner and provide research, grounded data to help in meeting housing needs. We are interested in having a meeting to discuss these comments more.

## **Our Future LA Housing Element Comments**

### **1. Protections**

- A. The housing element should expand just-cause eviction protections to cover all tenants and establish a corresponding enforcement program.**
- B. The housing element should implement a local RSO or strengthen/reduce the annual allowable rent increase for the existing RSO program.**
- C. The housing element should codify a tenant's right to counsel in an eviction proceeding.**
- D. The housing element should strengthen its permanent tenant education program to inform tenants of their rights and how to access eviction defense resources.**
- E. The HE should create and implement a tenant anti-harassment ordinance combined with enforcement resources.**

### **2. Preservation**

- A. The housing element must do more to prioritize rezoning - with value capture - in high-resource neighborhoods which are transit- and job-rich, including single-family zoned areas. This is necessary to expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.**
- B. The housing element should exclude parcels containing RSO housing units in the housing element's site inventory.**
- C. The housing element should require that no net loss provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.**

D. The housing element should institute local programs and funding sources for preservation of existing affordable housing.

**3. Prioritization of affordable housing**

A. The housing element should utilize a value capture mechanism, such as inclusionary zoning, to locally fund and/or incentivize affordable housing.

B. The housing element should prioritize creation of affordable housing on public land.

C. The housing element should streamline affordable housing production.

D. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas.

E. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas currently zoned R1.

**4. Site Capacity Assessment**

A. The housing element should estimate and report both the likelihood of discontinuation and the realistic capacity of inventory sites, both vacant and nonvacant.

**Comparison of claimed capacity vs. estimated realistic capacity**

Income Category	Claimed Capacity in			Estimated Add'n Dev Potential in Draft HE (13% dev likelihood)	Recommended Add'n Dev Potential w/20% NNL	Gap in Add'n Dev Potential
	RHNA Target	Draft HE	NNL Buffer			
VLI + LI	1,444	1,648	14%	214	1,733	-1,519
MI	490	671	37%	87	588	-501
AMI	556	861	55%	112	667	-555
<b>Total</b>	<b>2,490</b>	<b>3,180</b>	<b>28%</b>	<b>413</b>	<b>2,988</b>	<b>-2,575</b>

We estimate that the draft housing element will fall short of the RHNA goal, by 2,575 units of realistic capacity. The City must *fairly* estimate the likelihood of development for all parcels on the suitable sites inventory.

**B. The housing element should report the proportion of sites from the previous housing element's inventory that were developed during the previous planning period, and HCD-recommended methodologies and data sources should be used in order to conduct a thorough "factors" analysis of sites' realistic development capacity.**

**C. The housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, but should use statistical methods (e.g. surveying a random sample of owners of nonvacant sites) to determine that the sites' existing uses are likely to be discontinued during the planning period.**

**D. A buffer of at least 15-30% extra capacity should be included in the housing element site inventory. This capacity buffer is especially necessary in order to accommodate the lower-income RHNA target.**

See No Net Loss (NNL) section of 3A.

**E. The housing element should provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and should adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.**

**F. The housing element should commit to a mid-cycle review to verify the housing element's assumptions about development probabilities.**

### **5. Affirmatively Furthering Fair Housing**

**A. The housing element should meaningfully increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is low.**

**B. The housing element should meaningfully reduce the concentration of lower-income households in areas with significant exposure to noise/pollution and commit to reducing/addressing noise and pollution.**

**C. The housing element should ensure community-serving investment in historically disinvested areas. This includes place-based strategies that create a net gain of affordable housing and stop displacement, prioritize environmental justice, enhance community health and strengthen equitable community leadership in land use planning.**

**D. The housing element should include a thorough analysis of local patterns in socioeconomic/racial segregation and integration, including patterns of overt racial or ethnic discrimination in the housing and land development market.**

**E. The housing element should adequately prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities.**

**F. The housing element should adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.**

**G. The jurisdiction should adequately solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction's socioeconomic makeup.**

### **6. Forecasts of ADU Development**

**A. The housing element should use an HCD-recommended safe harbor methodology for forecasting future ADU production.**

**B. The housing element should provide for mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be large enough to make up for an ADU shortfall.**

**C. The housing element should assess the affordability of forecasted ADUs using city-specific data; it instead uses a regional average.**

\*\*\*

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

[Our Future LA](#)  
[Steering Committee Members](#)

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom  
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD  
Melinda Coy, Land Use and Planning Manager, HCD  
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD  
Paul McDougall, Housing Policy Development Manager, HCD



September 15, 2021

Redondo Beach City Council  
City of Redondo Beach  
415 Diamond Street  
Redondo Beach, CA 90277

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of Redondo Beach's general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding the 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law**'s mission is to make housing in California more accessible and affordable through enforcement of state housing law.

We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

In May 2021, [we submitted a comment letter](#) regarding Redondo Beach's draft housing element update. In the letter, we highlighted significant inconsistencies with state housing element law, including the requirement that housing element updates affirmatively further fair housing (AFFH), as well as inconsistencies with the State Department of Housing and Community Development (HCD)'s instructions regarding housing element design and implementation. Additionally, in October 2020, we shared [an outreach letter](#) and "[Requirements and Best Practices](#)" memo sharing general principles for high-quality housing element updates.

**[HCD's recent comment letter](#) on the City's draft housing element update directly addresses many of the same deficiencies that our May letter highlighted, and also states that "revisions will be necessary to comply with State Housing Element Law."<sup>1</sup> We have provided a brief summary below (Exhibit A) illustrating how HCD's comments on the City's draft housing element are largely congruent with our previous analysis.**

These deficiencies must be addressed in the final version of the housing element update. We urge the City to swiftly adopt a legally compliant housing element that accommodates the City's RHNA target and provides a variety of attainable housing options for the City's residents and workers.

Thank you for your time and consideration.

Sincerely,

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<sup>1</sup> HCD, Review of the City of Redondo Beach's 6th Cycle (2021-2029) Draft Housing Element Update, 9/2/21, pg. 1

Leonora Camner  
Executive Director  
Abundant Housing LA

Sonja Trauss  
Executive Director  
YIMBY Law

CC: Megan Kirkeby, Deputy Director, Housing Policy Development, HCD  
Melinda Coy, Land Use and Planning Manager, HCD  
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD  
Paul McDougall, Housing Policy Development Manager, HCD



**Exhibit A: Comparison of HCD Comment Letter and AHLA/YIMBY Law Comment Letter and Policy Recommendations**

<b>Deficiency</b>	<b>HCD Comment Letter Appendix</b>	<b>AHLA/YIMBY Law Comment Letter</b>	<b>AHLA/YIMBY Law Policy Recommendations</b>
<p><b>Insufficient AFFH analysis and policy reforms to promote integrated neighborhoods</b></p>	<p>Page 1: “The comparison of segregation levels at the regional and local levels must be complemented by local knowledge and relevant factors supporting conclusions. For example, the analysis should incorporate local conditions such as community opposition to affordable housing, and the City’s land use and zoning laws.”</p> <p>Page 1: “The element must demonstrate the sites inventory AFFH. [...] The site inventory analysis should address how the sites improve or exacerbate conditions relative to access to opportunity; segregation and integration; racially and ethnically concentrated areas of poverty and affluence; and disproportionate housing needs...”</p> <p>Page 5: “Program 15 (Fair Housing Program) should be revised to replace non-committal language such as “if feasible”, “assess the feasibility of”, or “assess” with language that commits to follow-up actions. The program must include specific timeframes for action and provide quantifiable description of actions to objectively measure for successful outcomes.”</p>	<p>Pages 4-5: “Planning’s intended approach to updating the housing element does not affirmatively further fair housing and reverse existing patterns of residential segregation. [...] The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.”</p> <p>Page 5: “In April 2021, HCD issued an AFFH Guidance Memo, which establishes a number of important principles for promoting fair housing, including [...] The distribution of housing-element inventory sites with lower or moderate income capacity must not be skewed toward lower-income neighborhoods. [...] The share of lower-income RHNA units assigned to tracts (or block groups) with a higher-than-average share of lower-income households should be less than the current share of lower-income households in those tracts.”</p> <p>Pages 5-6: “[The City’s] proposed site inventory, which does little to encourage housing growth, is therefore unlikely to advance the</p>	<p>Rezone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in high- and highest-resource areas, including R1 parcels where single-family detached homes are currently mandated by law.</p> <p>Do more to reduce the concentration of lower-income households in neighborhoods with high concentrations of low- and moderate-income households or with high exposure to pollution.</p> <p>Identify new funding sources and public resources to encourage the production and preservation of affordable housing, such as a real estate transfer tax, an introduction of congestion pricing, creation of a local density bonus program, and active abatement of unhealthy facilities, such as pumping stations, incinerators, and other polluting infrastructure.</p> <p>Exempt parcels containing rent-restricted and de facto affordable housing units from rezoning to prevent displacement of vulnerable households.</p>

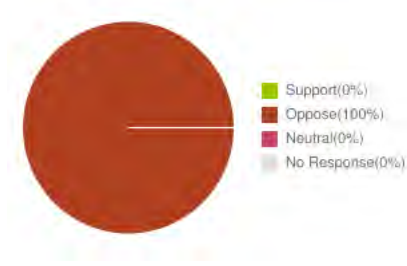
		<p>goal of socioeconomic integration or greater housing affordability. Also, by proposing to accommodate the vast majority of the RHNA goal in the North Redondo block bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards, a location with significant exposure to freeway noise and pollution, and by deterring housing growth in South Redondo, where environmental quality is significantly better, the City risks perpetuating the concentration of lower-income households in areas with poor environmental quality.”</p>	<p>Ensure that “no net loss” provisions apply to parcels in the site inventory and rezoning program with an annual and ongoing monitoring and implementation program.</p> <p>Prioritize the production of affordable housing on publicly-owned land, and offer that land to nonprofit developers at no cost as a lawful and bona fide concession through state density bonus law.</p> <p>Create a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.</p>
<p><b>Poor site suitability and failure to analyze likelihood of discontinuation for nonvacant sites</b></p>	<p>Page 2: “...the element identifies five nonvacant sites on 14.26 acres within the North Tech District as sites for residential overlay zoning to accommodate over half of the City’s RHNA shortfall for lower-income households. [...] The element includes only minimal analysis and description of the sites to establish their adequacy and concludes, “Existing conditions are ripe for redevelopment”. However, the sites include uses by large national business chains such as Vons, Baskin Robbins, and Super Cuts as well as a premier motorcycle dealership, a large plumbing business, and multiple locally owned restaurants. Additionally, the “triangle” area of the North Tech District appears to be an isolated location that is bordered on two sides by Lawndale and on</p>	<p>Page 2: “Per HCD guidelines, if a jurisdiction assigns more than 50% of its lower-income RHNA to nonvacant sites (a near-certain scenario for Redondo Beach), the jurisdiction must make findings supported by “substantial evidence” that the sites’ existing uses are “likely to be discontinued during the planning period.” But Planning failed to provide convincing evidence that redevelopment on the above sites is likely to happen.”</p> <p>Page 2: “...it is unlikely that the City’s rezoning plan will encourage meaningful housing growth. The City’s list of “critical Housing Element sites” includes: The block</p>	<p>Provide a quantitative estimate of parcels’ development probabilities, and incorporate this factor into the estimate of sites’ realistic capacity. Valid methodologies include the Survey Method or the Historical Redevelopment Rate Method.</p> <p>Report the proportion of sites in the previous housing element’s inventory that were developed during the planning period.</p> <p>Share letters from owners of the site inventory parcels, indicating their interest in selling or redeveloping these properties during the 6th Cycle. At a minimum, these letters would express interest, but, ideally,</p>

	<p>the third side by the 405 Freeway. Additional analysis is required to establish the adequacy of the sites and that existing uses do not preclude development within the planning period. If additional analysis does not establish the adequacy of the sites, the element will need to identify alternate sites for rezoning.”</p> <p>Page 2: “The element demonstrates a shortfall of 1,258 sites to accommodate the City’s RHNA for lower-income housing and identifies multiple sites from the Preferred Land Use Plan anticipated to accommodate the shortfall (pending approval of the electorate). All sites accommodating a shortfall must meet the requirements of Government Code section 65583.2, subdivisions (h) and (i). One of these requirements is that each site must accommodate a minimum of 16 units. Several sites have capacity estimated under 16 units and do not meet this threshold.”</p> <p>Page 3: “...the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established.”</p>	<p>bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards. The City’s major employers are all located here, including Northrop Grumman (which provides 1/3 of all jobs in Redondo Beach, and which is the City’s largest employer), DHL, the Amazon distribution center, the Uber Greenlight facility, and a trio of new hotels. The City’s plan indicates that apartments will be built there as a result of rezoning.</p> <p>However, while it is a good idea to encourage housing near jobs and transit, this particular proposal is not credible for the simple reason that Northrop Grumman is very unlikely to vacate Space Park over the next 8 years.”</p> <p>Page 2: “The South Bay Galleria owners are in the process of building homes on the Galleria parcel. But under the City’s plan, no additional residential development on the Galleria site would be allowed. The City’s alternative is to allow apartments on the land surrounding the Galleria, which are currently occupied by strip malls, bungalows and industrial sites -- but those properties’ owners have shown no interest in residential redevelopment of these sites.”</p>	<p>letters would describe plans in sufficient detail as to allow the City to quantify such interest into a likelihood of development.</p> <p>If the City lacks enough suitable sites to achieve the RHNA target, rezone additional parcels where redevelopment is likely. Merely adding more theoretical units to existing multifamily does not fulfill the City’s duty to AFFH (see above).</p> <p>Commit to a mid-cycle review to verify Planning’s assumptions about development probabilities and make adjustments if necessary.</p> <p>Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly. If the City does not have these data, it should apply the same discount as the City of Los Angeles due to the close proximity and microeconomic conditions that exist there.</p>
<b>Lack of</b>	Page 3: “Since the element does not	Page 3-4: “...the City plans to	Create a high-quality local density

<p><b>concrete constraint removal and adequate rezoning program</b></p>	<p>identify adequate sites to accommodate the regional housing need for lower-income households, it must include a program to identify sites with appropriate zoning to accommodate the regional housing need within the planning period.”</p> <p>Page 4: “Existing parking requirements are a constraint to the development of all multifamily units, not just smaller units. Therefore, the program should be revised to amend the parking standards for all multifamily development, not just for a subset of smaller units.”</p> <p>Page 4: “Program 15 (Monitoring the Effect of Article 27 of the City Charter (Measure DD)) should be revised to identify the relationship between the approval of the electorate on the November 2022 ballot measure and continued housing element compliance. The element currently demonstrates a shortfall of sites to accommodate its RHNA for lower-income households. The zoning actions required to provide sufficient adequate sites are contingent upon approval of the Preferred Land Use Plan by the electorate. The element should acknowledge that if the electorate rejects the ballot measure, the City must take additional action to retain housing element compliance.”</p> <p>Page 5: “The element describes typical fees for multifamily units to exceed typical fees for single-family units by over \$10,000 per unit. This is a potential constraint to multifamily development. The element should include a program to analyze why</p>	<p>reduce the amount of development in areas where housing pencils out. This isn’t just a bad idea - it also violates Government Code section 65863. Per HCD, “A jurisdiction may not take any action to reduce a parcel’s residential density unless it makes findings that the remaining sites identified in its Housing Element sites inventory can accommodate the jurisdiction’s remaining unmet RHNA by each income category, or if it identifies additional sites so that there is no net loss of residential unit capacity.” Downzoning is illegal unless the City can show that the additional capacity is made up for elsewhere. Here, it is not.”</p> <p>Page 6: “The City is already required to identify and remove constraints to housing production under Government Code section 65583. The City should commit to major constraint removal policies in order to encourage strong housing growth at all levels of income.”</p> <p>Pages 2-3: “The City overlooks large numbers of potential housing sites, including: the AES site (51 acres), the former South Bay Medical Center site (9.3 acres), beachside parking lots (24 acres), the Space Park and Aviation Park parking lots (62 acres), the Riviera Village parking lot (2 acres), and the west side of the Redondo Beach Transit</p>	<p>bonus program, which would also apply to low-density parcels where apartments are banned today.</p> <p>Pre-approve standard accessory dwelling unit (ADU), small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.</p> <p>Speed up the timeline for ministerial review, and expand ministerial review to apply to more projects.</p> <p>Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.</p> <p>Reduce restrictions on maximum height, floor-area ratio, unit size, setbacks, and lot coverage.</p> <p>Rezone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in high- and highest-resource areas, including R1 parcels where single-family detached homes are currently mandated by law.</p> <p>Reduce fees on multifamily residential development.</p>
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	this occurs and include actions to mitigate the effects.”	Center.	
<b>Insufficient public review</b>	Page 6: “HCD understands the City made the element available to the public less than a week prior to its submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD’s ability to consider public comments during its review.”	Page 8, <a href="#">Supplemental Memo</a> : “To overcome bias in patterns of public participation, jurisdictions should sample a random cross-section of the community (e.g., from voter or jury rolls), and elicit the respondents’ preferences and priorities regarding zoning and residential development. If response rates vary with demographic or geographic characteristics of respondents, the survey results should be reweighted accordingly so that they more accurately reflect the distribution of opinion within the community.”	Survey or poll a statistical sample of the community, and elicit the respondents’ preferences and priorities regarding zoning and residential development. If response rates favor privileged groups, the survey results should be reweighted accordingly so that they more accurately reflect the distribution of opinion within the community. Offer this survey mechanism in the top languages spoken in the City, in both online and hardcopy formats.

## Overall Sentiment



### **Alisa Beeli**

Location:

Submitted At: 2:12pm 09-16-21

Dear Planning Commission,

I am writing to voice my concerns with the 6th Cycle Housing Element, and urge you to reject it. The Housing Element places nearly all of the required units in 90278, which is blatantly unfair to the residents of North Redondo. A better, more equitable plan would distribute the units throughout the entire city, including 90277. My concerns include:

1. The plan places nearly all of the new units on the edges of the city, areas that are highly trafficked and bordering surrounding cities such as Lawndale and Torrance, which of course have their own housing requirements. This will not solve our housing problem, it will exacerbate it.
2. All of the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190th) are adjacent to less affluent areas of the city, all in North Redondo. By contrast the plan does not provide increased housing in the more affluent, beach-adjacent, communities of the South. My understanding is that state law prohibits the concentration of low income housing in one location. How can the Housing Element plan be considered in its current state?
3. North Tech is estimated to accommodate 28% (685) of the required units on its own. Do the current property owners plan on relocating? Also this location is within 250 meters of the 405, which would pose serious health impacts on residents, not to mention a roughly 45-minute commute to high school.
4. Although the Planning Commission originally voted 5-2 to recommend 50% of the power plant site zoned at 30 dwelling units per acre, City Council rejected that idea. City Council also ignored the hundreds of public emails and statements asking to consider alternative sites within 90277, including the power plant site, with its adjacency to parks, the beach and high school.
5. Redondo Beach completed 40% of its 5th cycle RHNA. Given the issues of the 6th cycle plan, it's difficult to imagine how Redondo Beach will meet its requirement of 2,490 units in its current state.

Thank you for listening to my concerns. Please work toward a more equitable distribution of the housing units throughout the entire city of Redondo Beach.

Sincerely,  
Alisa Beeli

From: [Huntley, Robin@HCD](mailto:Huntley_Robin@HCD)  
To: [Sean Scully](#); [Brandy Forbes](#)  
Cc: [Veronica Tam](#)  
Subject: Fw: REDONDO BEACH HOUSING ELEMENT - OVERDEVELOPE IS OUT OF CONTROL  
Date: Friday, September 17, 2021 9:23:56 AM  
Attachments: [Outlook-dxponevd.png](#)

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

HCD is forwarding comments received and offers the City the opportunity to respond.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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**From:** luvmypets.07@verizon.net <luvmypets.07@verizon.net>  
**Sent:** Sunday, September 12, 2021 7:52 AM  
**To:** Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>; luvmypets.07@verizon.net <luvmypets.07@verizon.net>  
**Subject:** RE: REDONDO BEACH HOUSING ELEMENT - OVERDEVELOPE IS OUT OF CONTROL

Ms. Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard, Suite 500  
Sacramento, CA 95833  
[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)

RE: Redondo Beach Housing Element

“The best place to put high density housing is the 50 acre Power Plant that is being decommissioned because ocean through cooling plants are now banned. Please don’t ignore the 500 voices who used Social Pin Point to express their opinion on where high density housing should be placed.”

~

The City Council ignored a large 50 -acre parcel for affordable housing. The owner of the 50 acre parcel submitted a letter stating the land could be ready for housing yet his land was ignored. Appropriate alternatives that can be exclusively residential or mixed use are the 1-acre site at 1021 N. Harbor and the 50-acre power plant at 1100 N. Harbor. Both are adjacent to parks, bike paths, beaches and harbors and surrounded by developments ranging from 17.5 to 120 units per acre and yet were not considered for any housing.

The Planning Commission voted 5-2 to recommend 50% of the 1100 N Harbor Drive site zoned at 30 dwelling units an acre The City Council ignored the recommendation and placed all the new zoning in the



north side of town in areas that are not likely to be built.

Redondo completed 40% (559 of 1,397) of its 5<sup>th</sup> cycle RHNA. Looking forward, it's hard to imagine how it will meet its 6<sup>th</sup> cycle requirement of 2,490 units without taking proactive steps to update its zoning throughout the city.

Redondo Beach City Council 's solution is to put all of the newly zoned parcels into the fringes of the city that are highly trafficked and literally at the city's edge. While ignoring a 50 – acre site of a decommissioned Power Plant whose owner is more than willing to build affordable housing.

All the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190<sup>th</sup>), show all of them to be adjacent to other, less affluent jurisdictions.

All the overlays shows the probability of any units materializing within them are extremely low. Some examples are as follows:

1. North Tech, a 5 parcel, 14.26-acre site comprised of three property owners and entirely within 250 meters of the freeway. It is the only portion of Redondo east of the 405 and surrounded by the city of Lawndale. Estimated to accommodate over a quarter of Redondo's housing requirements (685 of 2,490 or 28%), the properties include the following:
  - a. a business that has been in Redondo since 1985 and has no intentions of relocating or shutting down; and
  - b. a grocery anchored shopping center owned by a national REIT with no plans of selling or repositioning the property given it 100% occupancy strong roster of 17 tenants including Vons and Petco and no vacancy; and
  - c. a national plumbing fixture showroom that has been there for years.Not only is the likelihood of any residential being developed in this area extremely low, but any units developed would pose serious adverse health impacts on its residents. The residents would have a 45 minute commute to the only High School and would not be near any of Redondo's neighborhood amenities.
2. The 6.21-acre South of Transit Center - Industrial Flex site at 2819 182<sup>nd</sup> Street is planned to accommodate 224 units. The property was purchased by NantWorks in 2019 and intended to house one of its portfolio companies. The company is owned by one of Southern California's wealthiest individuals and has been working with the city on a specific project, which does not include housing.
3. The South Bay Galleria, a 29.85-acre shopping mall across the street from the cities of Lawndale and Torrance sought entitlements for 650 units only to settle for 300 units. There already is an EIR in place for 650 units.

I live in North Redondo and we are losing our small town charm. Development is out of control. The traffic in the residential area is bad. The streets are clutter with cars, resulting from families having more than one car, and drive ways are full. The streets are getting narrow, due to the parking. Some streets are worst than others, because parking is on both sides (one way streets). Artesia Blvd, traffic has increased substantially and not safe. Overdeveloped is out of control, and is very disappointing when, people, who sit behind a desk make these decisions, and have no idea what it really looks like around here. North Redondo is packed already. We are not a dumping ground. At what point, is someone going to put a CAP on growth. Over crowding does not make it safe.

Please don't let City Council get away with zoning housing in unlikely sites while ignoring large parcels next to the beach, bike paths and parks.

Thank you for the consideration,

Mary Schurr  
North Redondo Beach, California

From: [Robert Doran](#)  
To: [Maria Herrera](#)  
Cc: [Sean Scully](#); [Lina Portolese](#)  
Subject: FW: General Plan Update - Redondo/"Opportunity Area" Designation - 4001 INGLEWOOD AVE AND 4051 INGLEWOOD AVE  
Date: Wednesday, September 22, 2021 1:52:37 PM  
Attachments: [image004.png](#)  
[.msg](#)  
[2021\\_09\\_22\\_13\\_45\\_09.pdf](#)

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Maria:

ROIC would welcome the opportunity to introduce High Density Residential to our Redondo Beach Plaza. I have attached some examples of other properties we own where we have recently completed or are in the process of entitling/permitting densification efforts which includes residential components.

Please let me know if I can be of any further assistance in this endeavor.

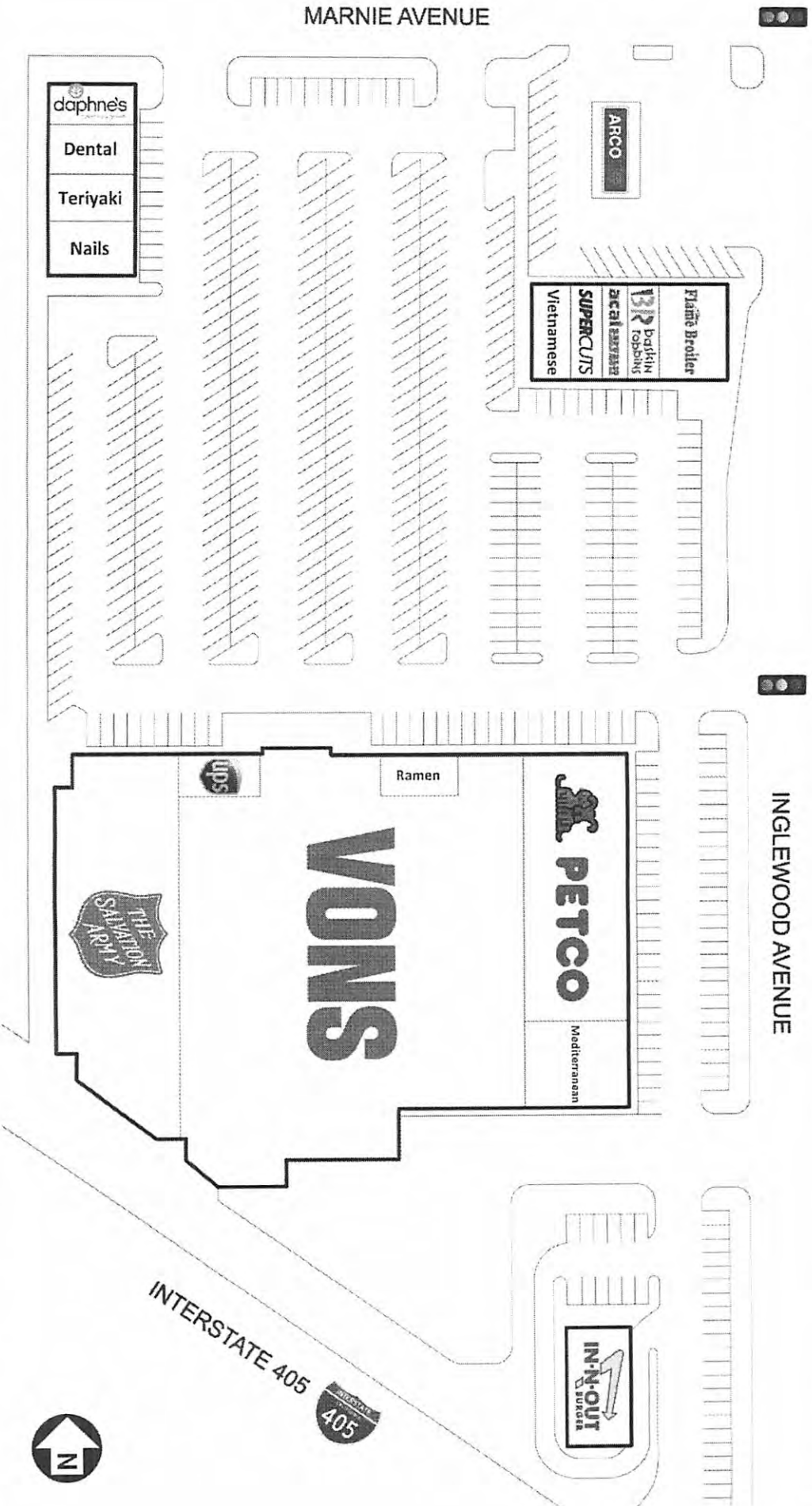
Sincerely:

Robert Doran  
Director of Development & Construction  
**RETAIL OPPORTUNITY INVESTMENTS CORP**  
11250 El Camino Real, Suite #200  
San Diego, CA 92130  
Office: 858-255-4920

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**Redondo Beach Plaza**

Redondo Beach, CA  
110,509 sq. ft.



Courtney Brodie  
888.922.6825  
888.888.ROIIC (7647)  
cbrodie@roiic.net

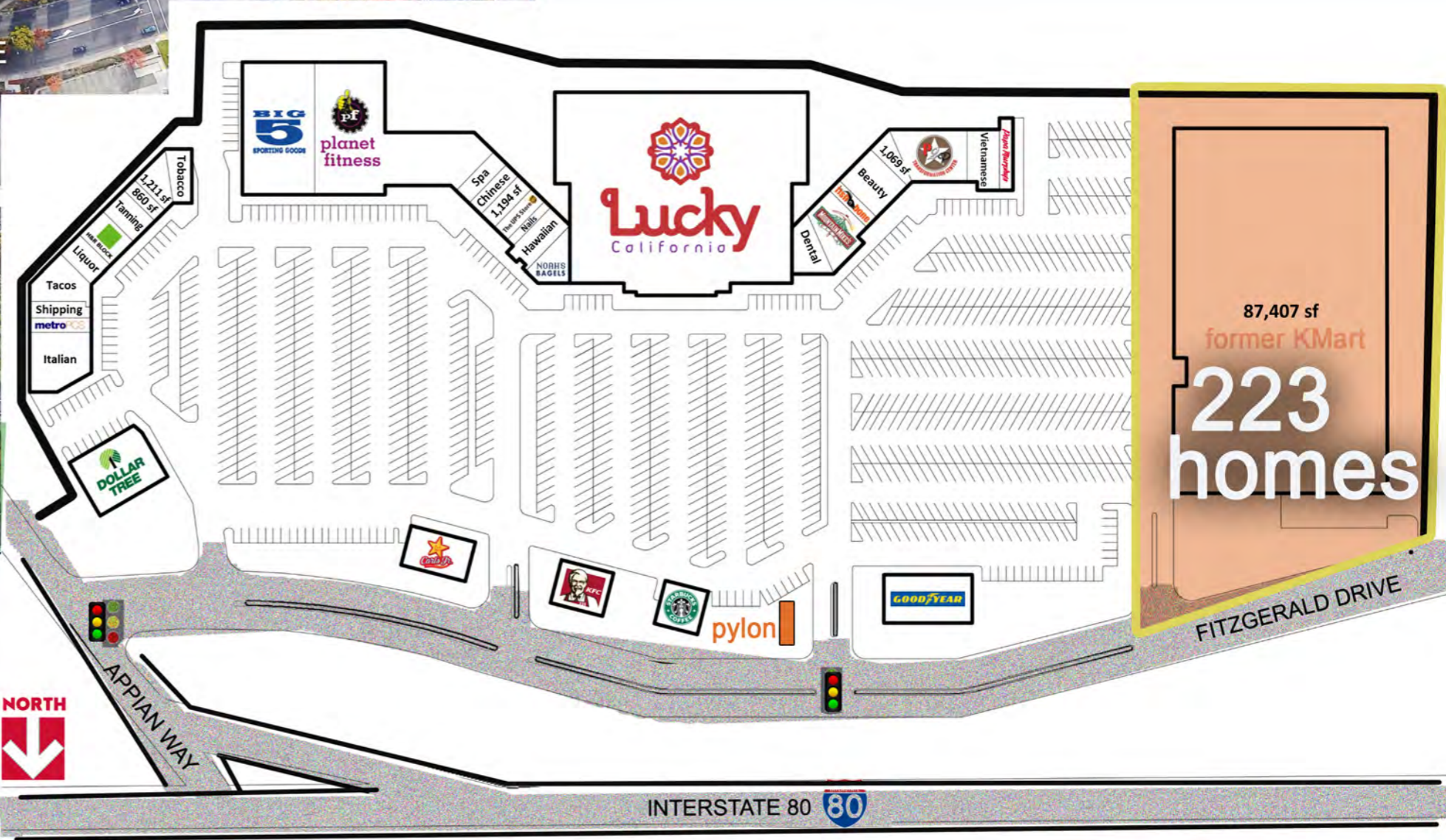
[www.roiic.net](http://www.roiic.net)

Note: This site plan indicates the general layout of the shopping center and is not a warranty, representation or agreement on the part of the landlord that the shopping center will be exactly as depicted.



# PINOLE VISTA PLAZA

This opportunity can transform an undersused and outdated retail space on 5 acres of land into a vibrant and vital space for 223 homes.

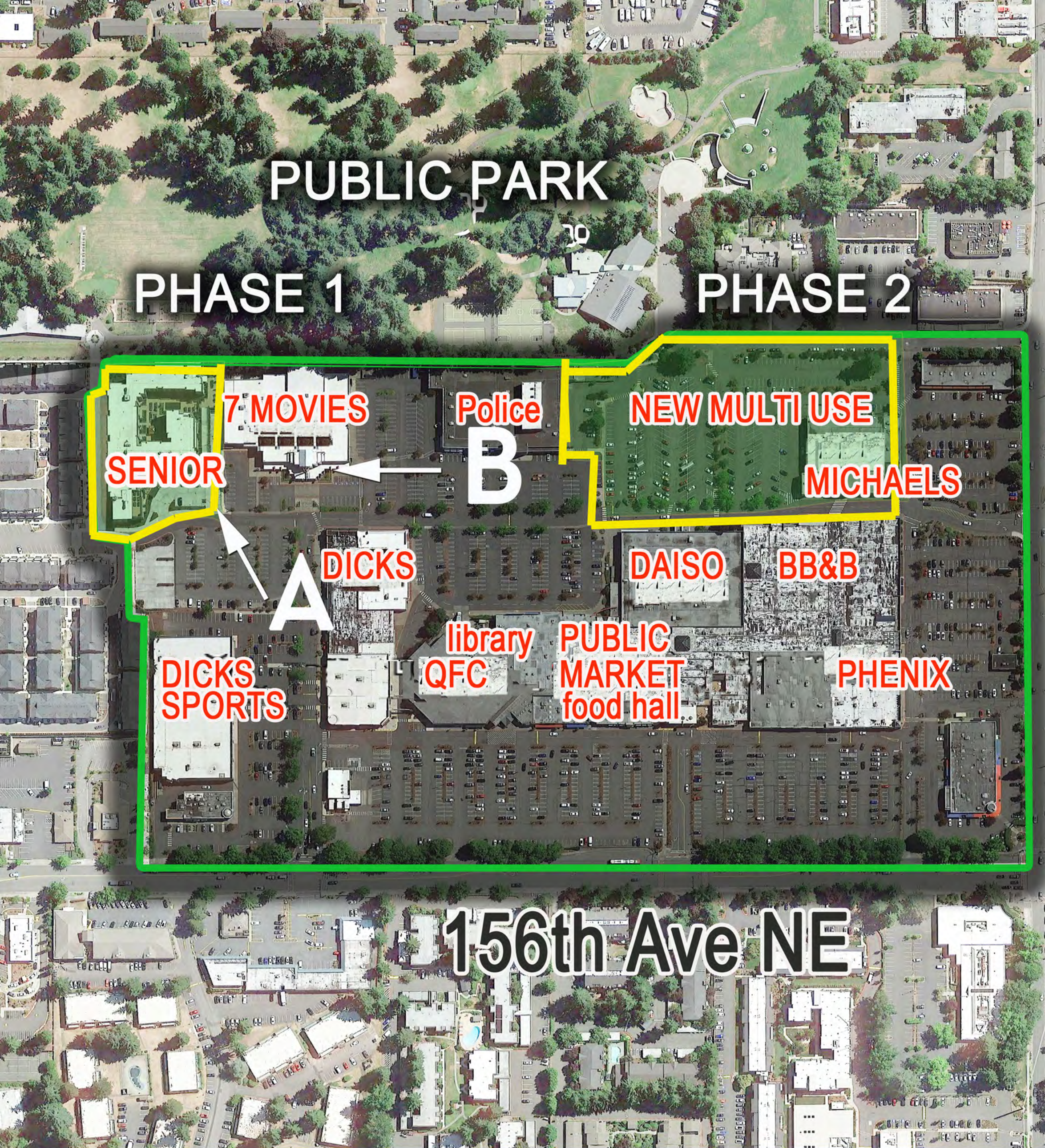




In seamlessly adding 223 residential homes in an area that was underused and outdated, a community can be created to take advantage of close freeway access, neighborhood amenities such as Food, Cafes, Health and personal services.







Photos A and B show how the newly completed construction of Phase One of ROIC's program for densification blends in with the existing neighborhood and becomes part of a community streetscape. This provides 185 homes for Seniors on a previously underused part of the property.  
**THIS IS NEW PHASE 2**



**DENSIFICATION PROGRAM** recently completed maximizing utility of site

**CROSSROADS** Bellevue WA







**224 APARTMENTS  
+ 14.5K SF OF RETAIL**

**CrossRoads BELLEVUE PHASE TWO<sup>2</sup>**



**PHASE 2  
SITE PLAN**

**PHASE 1** added 185 senior housing residences completed 2020

**PHASE 2** adds 224 apartments with parking on-site

Creates 14.5 K s.f. ground floor retail  
Expansion of existing park connected to Public Park

The Project's Redevelopment Agreement was recently executed by the Bellevue City Council and Design Review Comments are expected early Fall 2021  
Construction to start late 2022



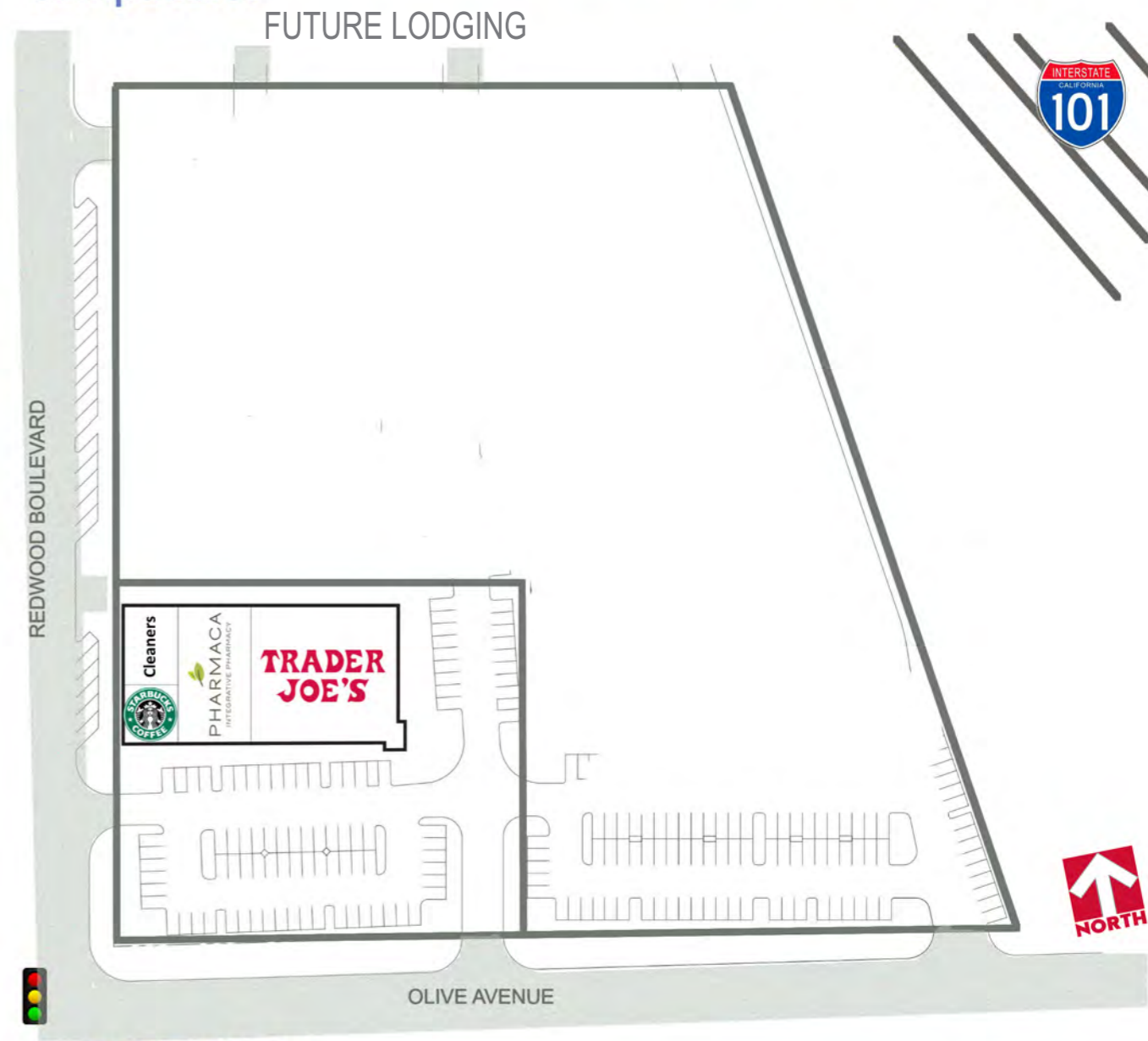
**DENSIFICATION PROGRAM PHASE TWO** of maximization of utility of site

**CROSSROADS**  
Bellevue WA





An opportunity is available on 6 empty acres surrounding a small successful commercial property to create a new neighborhood of 173 homes, combined with 15,000 sf. of community retail, cafes, health and personal services. ROIC controls both, so all will be compatible.



the neighborhood



the existing retail shops and market

SITE PLAN





proposed looking south east

FUTURE LODGING FACILITY



A NEW COMMUNITY can be created from an underused 6 acre property now available to add 178 homes in an established neighborhood, while adding approximately 15K sf. within ground floor one story street fronts and patios with cafes, personal services and residences above. All contribute to the Village ambience.



# **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.*

## **CITY COUNCIL MEETING 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 <[Eleanor.Manzano@redondo.org](mailto:Eleanor.Manzano@redondo.org)>; Bill Brand <[Bill.Brand@redondo.org](mailto:Bill.Brand@redondo.org)>; Nils Nehrenheim <[Nils.Nehrenheim@redondo.org](mailto:Nils.Nehrenheim@redondo.org)>; Todd Loewenstein <[Todd.Loewenstein@redondo.org](mailto:Todd.Loewenstein@redondo.org)>; Zein Obagi <[Zein.Obagi@redondo.org](mailto:Zein.Obagi@redondo.org)>; Angel Frank <[fangel@angellaw.com](mailto:fangel@angellaw.com)>

**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 <[Eleanor.Manzano@redondo.org](mailto:Eleanor.Manzano@redondo.org)>; Bill Brand <[Bill.Brand@redondo.org](mailto:Bill.Brand@redondo.org)>; Todd Loewenstein <[Todd.Loewenstein@redondo.org](mailto:Todd.Loewenstein@redondo.org)>; Zein Obagi <[Zein.Obagi@redondo.org](mailto:Zein.Obagi@redondo.org)>; Nils Nehrenheim <[Nils.Nehrenheim@redondo.org](mailto:Nils.Nehrenheim@redondo.org)>

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



*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 phase-general 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 <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [+Horvath.RBD3@gmail.com](mailto:+Horvath.RBD3@gmail.com)

**Subject:** City Council - My public comments for L.1 Housing Element



*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](mailto:redondo=comcate.com@mg.comcate.com) <[redondo=comcate.com@mg.comcate.com](mailto: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](mailto:Melissa.Villa@redondo.org)>  
**Subject:** New Comcate Case: Mayor & Council>Public Comment on Agenda Item (you are owner)



*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: <https://clients.comcate.com/rep/caseDetail.php?ag=23&id=1774566>  
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

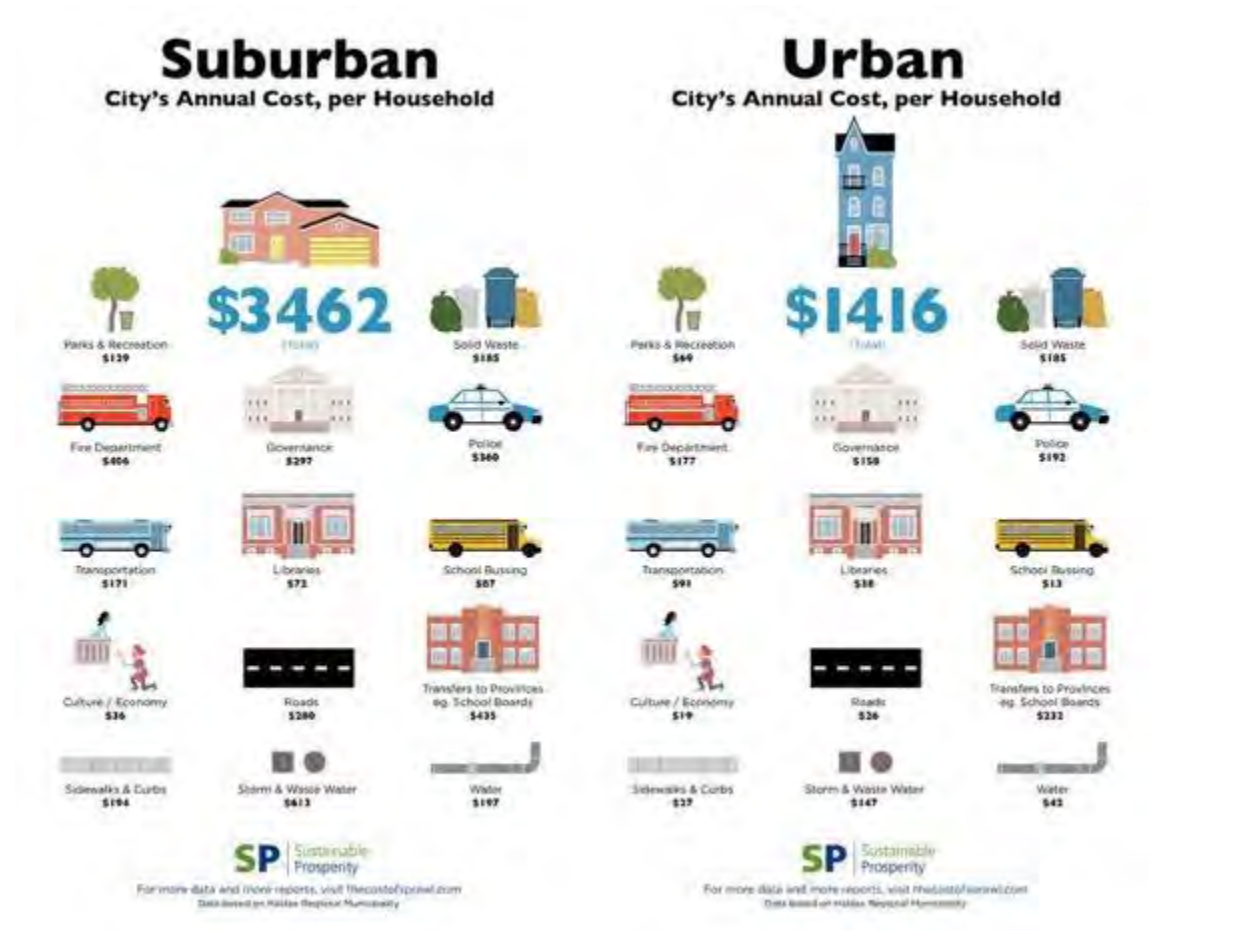
Justice and the law requires that we balance the benefits and burden of new residents to improve the lives of our new residents. By the way, research and evidence shows that children

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

## 1. Executive Summary

Our community has been down this road three times in recent history just to result in three dead end wastes of years and millions of dollars. Heart of the City, Measure B, and the CenterCal mall all suffered the same fate. The track record from Redondo's inception shows the folly of trying over develop the harbor area, especially with residential development.

It would be hard to select a site that would be more impactful and more opposed. The following paragraphs provide the evidence of the impacts and the track record of opposition. Let's not ignore history. Save us the cost, time and divisiveness of going through a charade that will end up in failure in the end.

This is the wrong time to hand the new owner the entitlement of high density residential development. The AES site has active wetlands. Embrace that and honor the history and cultural value of the site by commitment to major parkland and wetlands at the site. And do not take away the city's only bargaining position with the new owner.

## 2. Site Not Available

The combination of climate change, power demand growth, and the lack of power grid resources to address evening demand make the current power plant shut down date questionable.

The City of Redondo and its residents have been fighting to shut down the current power plant since before 2000. With the rulings on power plants that use water cooling, the City believed the end was in sight with a mandated shut down date of December 2020. In the meantime, power outages caused by excessive heat events drove an emergency one year extension to the shut down. Commissioners assured Redondo that the date would not be extended again. However, just one year later the shut down date was extended to 2023. There is no assurance this will be the last extension. In fact, Flex Alert events this past year demonstrate that the 2020 multi-state heat wave events were not just a fluke. It takes years and billions of dollars to add new capacity to the grid to address the currently projected needs. **It is highly likely the shut down date of the AES Redondo power plant will be extended again and again.**

## 3. Required Zoning Change Unlikely To Be Approved

The Redondo Beach City Council is not the final authority of the zoning change that would be required to add residential development to the AES site. The zoning change will also drive a Local Coastal Program (LCP) change that would require certification by the Coastal Commission. Additionally, the Redondo City Charter requires a vote of the residents to approve the zoning and LCP changes.

### a. Coastal Act and Coastal Commission Approval for LCP Change

The Coastal Commission must evaluate the submitted LCP change against the Coastal Act. The Coastal Act prioritizes coastal dependent public uses and access as well as environmental impacts over commercial and private uses. The proximity of the site to the harbor, the historic wetlands, and the poor road access create real hurdles to any meaningful increase in residential development, especially high density, largely market rate residential units.

## The Case Against High Density Residential at the AES Site

**Wetlands on the AES site** – While processing AES’s application for a new power plant, the Coastal Commission found that the AES site still has active wetland activity over at least a 6 acre area centered north to south of the site and along the eastern portion of the property. This wetland site is the remnants of the historic 16 acre Salt Lake that was filled in to build the current power plant. It is situated in a strategic location along the Great Pacific Flyway relied upon by many species of migratory birds. Subsequent to the Coastal Commission finding of wetlands, the local Audubon Chapter has cataloged thousands of birds representing over 130 species using the site. Some of these species are year round residents and some are migratory birds wintering at the site. Nesting pairs and broods have been documented in the Audubon cataloging. There have been Snowy Plover and Western burrowing owl sightings immediately adjacent to the AES site. The Snowy Plover is endangered. And, the Western burrowing owl is a species of special concern in LA County. **Any development of the site will require a minimum of 6 acres of wetlands and an appropriate buffer zone between the wetlands and any development on the site.**

**Coastal access impacts of high density residential development on the AES site** – Redondo Beach is jobs poor for the workforce that is dominant in the city. As a result, a City-funded market analysis shows about 93% of working residents commute outside the city to work. There is no efficient and effective mass transit available in this area. The metro line routes require too much time and too many line changes to get to the job centers to the north, north east and east of the city. The nearest freeway access is over 20 minutes drive. That means the majority of the working residents of this potential housing center would have to drive through already gridlocked city arterials to get to their jobs. Adding traffic to already gridlocked local roads would deter access to the harbor area for coastal dependent uses by the public. The intersection of Herondo and PCH is already at capacity and at times over capacity. The only other road bordering the property is Harbor Drive which is a very narrow and already heavily used. Harbor Drive is the only access to the Harbor Area. Clogging it with more traffic would be a deterrent to public access for coastal dependent uses. **With the vast majority of the residential development being market rate housing, the Coastal Commission would have to consider the impacts to low cost, coastal dependent access to the only harbor in the 25 miles of coastline between Marina Del Rey and the Port of Los Angeles.**

**Demonstrated intent** - The combination of established wetlands and the limited access to the harbor area would likely result in significant limits on the amount of residential development approved by the Coastal Commission. Historically, the Coastal Commission forbid **any** new residential development just across the street from the power plant. And the Coastal Commission has demonstrated its commitment to protecting the wetlands on the AES site – it has twice ordered AES to stop dewatering activities by AES aimed at drying out the established wetlands.

Before the LCP change is even submitted to the Coastal Commission, the voters of Redondo must approve it. It is unlikely the voters of Redondo would support such a change.

### b. Voter approval of the required zoning change for the AES site

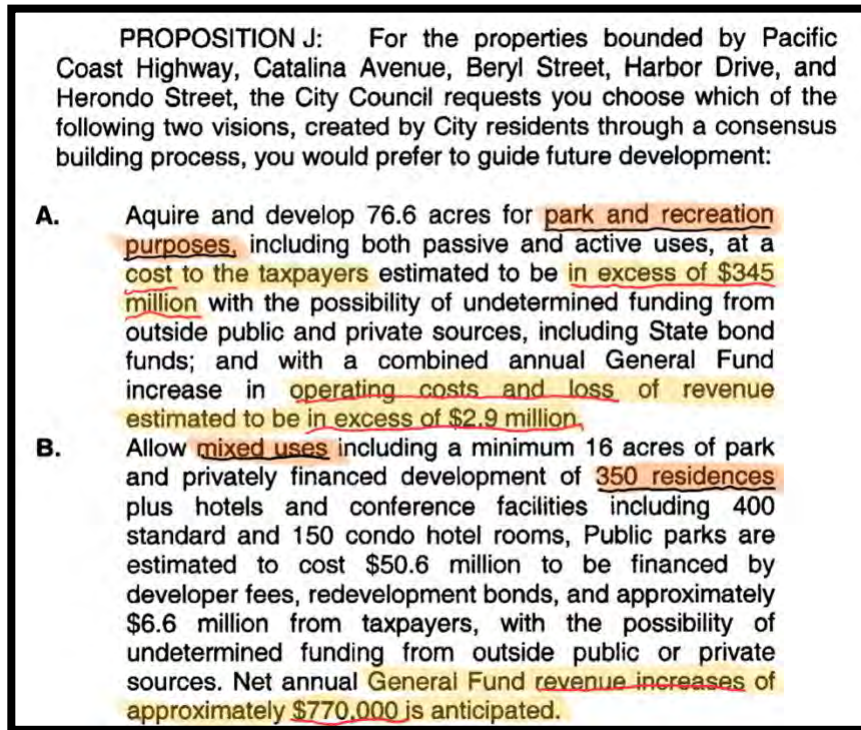
Article XXVII of the Redondo Beach City Charter requires a vote of the residents of Redondo to approve significant zoning changes in the city. So before the City can submit any LCP change to the Coastal Commission, the change must first be approved by the voters of Redondo. **Given the history of resident votes and actions related to residential development on the AES property, it is highly unlikely that the voters of Redondo would approve high density residential development on the site.** A brief synopsis



## The Case Against High Density Residential at the AES Site

of these historical indications follow:

- **2002** – Residents submit a Referendum to rescind rezoning of the site for high density housing.
- **2003** – Residents submit a Referendum to rescind an action of the City to create a Redevelopment Area for residential development of the AES site.
- **2005** – Despite heavily biased ballot language (**Figure 1**), residents approve park uses of the AES site over a mixed use development alternative that included 350 residential units.
- **2008** – Tired of repeated City attempts to increase residential units in the harbor/AES area, residents approve a City Charter change that requires voter approval of major zoning changes.
- **2010** – Voters approve zoning change that makes “Parks” a “permitted use” on the AES site. Public Utilities are a “conditional use” in that zoning. There are no residential uses allowed in the zoning.
- **2015** – Voters reject AES zoning initiative (Measure B) that included 650 residential units. **Voters rejected AES’s initiative despite AES’s expenditure of over \$1M on a campaign that included dozens of mailers, billboards, social media ads, local publication ads, and TV ads.** The addition of residential development was a major factor in the resident vote results.
- **2017** – In a rare occurrence, a new Mayor candidate, Bill Brand, defeated a seated Mayor, Steve Aspel. Brand was a long term activist against overdevelopment while the sitting Mayor supported large development projects including AES’s Measure B.
- **2017-2018** – Residents defeated a city-approved project to build a mall in the harbor through CEQA lawsuit, a ballot measure that rezoned the harbor (Measure C), and an appeal to the Coastal Commission. Residents were successful on all three fronts. **Although this project did not include residential development, residents opposed the scale of the development, the traffic impacts of the development, and the access impacts of the development. Any meaningful residential development on the AES site would include all three impacts recently rejected by residents.**
- **2021** – Voters reelect Mayor Brand and elected Council members who opposed overdevelopment. Candidates who supported overdevelopment were rejected by the voters including one sitting incumbent Council member. Again, defeating a sitting Council member is a rare event in Redondo. **This recent vote demonstrates that after a decade, Redondo voters still oppose overdevelopment and the loss of quality of life in the city.**



*Figure 1: 2005 Redondo Advisory Vote Ballot Language. Heavily biased 2005 ballot language asked voters to choose between park uses of the AES site and mixed uses of the site that included 350 residential units. Redondo voters chose the park uses with no residential development despite the biased assessment of fiscal impacts on the community.*

The voters have a clear, repeated, and ongoing track record of taking strong action against high density development, especially residential development, in the harbor area and specifically on the AES property – even in the face of strong proponents and expensive, developer-funded campaigns for the development. It is highly unlikely the voters of Redondo would approve any meaningful residential development on the AES site.

#### 4. Economically Bad For the City

##### a. Already lost grant money

When the current property owner sensed an opportunity to make money with no investment by allowing the power plant to continue operations, he reneged on his commitment to sell the City 25 acres of parkland. This action resulted in the Natural Resources Agency pulling back its \$4.8M grant to Redondo Beach. In parallel, this action stopped the momentum on establishing the Enhanced Infrastructure Financial District.

##### b. Increases cost of park land and eliminates any bargaining position of the City

The loss of the one grant represents a temporary setback until the site becomes available. However, it is an indicator that the property owner will throw out previous agreements when there is a firm financial incentive to go another direction. The only leverage the City has to negotiate for meaningful parkland is

## The Case Against High Density Residential at the AES Site

the zoning entitlements the developer needs to do anything but park or public utility. If Redondo grants the owner the entitlement to high density housing, it raises the value of the land while eliminating any bargaining position for the City to negotiate any real amount of public parkland. Even if the owner still commits to major parkland, the price per acre will be significantly greater. **This is the wrong time to gift a speculative real estate investor the highest value zoning.**

### c. Exacerbates workforce/jobs imbalance

According to a City-funded market study, nearly 93% of the Redondo workforce commute out to the city to go to work. To fill the retail, hotel, and restaurant jobs that dominate the Redondo job market, over 90% of the positions are filled by workers from outside the city. Redondo has less than 1 job per household, where a city like El Segundo has 6 jobs for each household. The study shows why so many residents commute out of the Redondo to work:

*“Some of the largest employment sectors for Redondo Beach residents, such as white-collar office jobs which are associated with higher- than-average wages, are **dramatically** under-represented in employment opportunities located in the City.”*

**So not only does Redondo have fewer jobs per household, the jobs that are here don't match the Redondo workforce. Adding more high density housing that is predominantly market rate will only exacerbate this trend.** The impact of this is that nearly half the population of Redondo leaves town each weekday to go to work. This is a huge loss of weekday customers to the restaurant and retail businesses that dominate Redondo's commercial districts. That loss of customer-base results in underperforming business districts, which in turn impact the City's sales tax revenues. It also has resulted in degradation of the quality of the business districts due to lack of investment. In recent workshops, retailers and restaurateurs from the harbor area called the harbor a “ghost town” during the workweek. Meanwhile, business districts near thriving job centers such as the Rosecrans corridor in El Segundo enjoy booming business during the workweek. Redondo needs more high end jobs, not more commuting residents, to buoy our business districts back up. Adding market rate, high density housing in the harbor area only exacerbates our current problems.

### d. Net loss of city revenues

The City is having an increasingly difficult time of balancing the City budget. The problem is the services required by residential development costs the City more than the revenues the City gets from the residential development. Otherwise, in a City that is over 65% zoned residential, our city coffers should be booming. More housing and more commuters only exacerbates the city's current financial losses to residential development.

## 5. High Density Residential Exacerbates City Parkland Disparity

The City of Redondo is “park poor” by state standards. The state's minimum parkland threshold is 3 acres of parkland per 1000 residents. Even including the County beach, Redondo is less than 2.5 acres of parkland per 1000 residents. The cities surrounding Redondo all have over 5 acres of parkland per 1000 residents, well over double the parkland ratio of Redondo residents.

In 2011 the California Coastal Conservancy funded an study by the 606 Studio of Cal State Pomona to explore how the South Bay could add parkland. The study concluded:

## The Case Against High Density Residential at the AES Site

*“As the situation regarding the AES power plant is re-evaluated, it should be noted that the site has the strong potential to be converted to a large park. The long term vision of a large Waterfront Park at this location will provide valuable park space, create a cornerstone of the community, and serve as a major node in the [open space] connectivity network.”*

Adding 25 acres of parkland at the AES site would allow the city to barely achieve the minimum threshold of 3 acres per 1000 residents. This would still fall far short of the City goal of 5 acres of parkland per 1000 residents. And of course, with infill development and state mandates, the number of residents will continue to grow – making the minimum and goal thresholds harder to achieve.

As the only reasonable opportunity to add useable parkland in the foreseeable future, using this site for residential development rather than for a large park would exacerbate Redondo’s parkland disparity. This action would dramatically increase the number of residents while eliminating the only space to add meaningful parkland.

### 6. Highest Traffic Impact/Limits Harbor Access

Locating high density housing in the harbor area represents the highest traffic impact over other locations that are better suited for housing. Redondo already suffers from gridlocked arterial roads during peak rush hours. This is driven by the poor transit system and the workforce/jobs imbalance. The table to the right, from a City-funded market study, shows over 30,000 residents leave the city each day. That is nearly half the population of Redondo. Over 90% of Redondo jobs are filled by workers who commute INTO Redondo from other communities. This clearly shows the workforce/jobs imbalance as well as the main driver of rush hour gridlock.

With the lack of efficient and effective transit alternatives, all this commuting results in traffic clogging Redondo arterials as shown in the graphic to the right. The market study shows that most Redondo workers commute to job centers to the north and northeast of the city and to the east of the southern end of the city.

Only Herondo Ave and Harbor Boulevard border the AES site. To go north and east commuters from the AES site would end up at the major intersection of Herondo and PCH or at the PCH/Torrance Blvd intersection. **The City circulation element projects both intersections to be over capacity for morning and evening rush hours in 2030. And it is not just those intersections. Commuter traffic would have to continue through the rest of Redondo no matter where the commuters work. So the traffic impact is along the entire length of Redondo arterials. It would be difficult to define a more impactful location from a traffic perspective.**

Further exacerbating the situation, the harbor area can only be accessed from Harbor Drive. Harbor Drive is a single lane in each direction with multiple stop lights and heavy pedestrian and bicycle traffic. Harbor Drive can only be accessed through Beryl, a residential street; Herondo, an overclogged arterial; and Hermosa Avenue. Clogging up traffic by adding the traffic associated with a high density housing development would block access to the coastal dependent recreational and commercial assets in the harbor. This is a violation of Coastal Act priorities. And as described earlier, Redondo voters vote

**Table 15: Commuter Flows, 2014**

Redondo Beach Residents by Place of Work		
Place of Work	Employed Residents	
	Number	Percent
Redondo Beach	2,491	7.5%
All Other Locations	30,527	92.5%
<b>Total</b>	<b>33,018</b>	<b>100.0%</b>

Redondo Beach Workers by Place of Residence		
Place of Residence	Workers	
	Number	Percent
Redondo Beach	2,491	9.6%
All Other Locations	23,440	90.4%
<b>Total</b>	<b>25,931</b>	<b>100.0%</b>

Source: US Census LEHD, 2014; BAE, 2017.

Figure 1b: LEHD Inflow/Outflow Analysis by "All Jobs", Redondo Beach



## The Case Against High Density Residential at the AES Site

against traffic and the Coastal Commission has previously limited residential development in the harbor area to protect harbor access.

### 7. Cultural and Historical Impacts

#### a. Pre-history: Salt Lake

The unique geological conditions at the AES site resulted in a 16 acre salt lake at the current AES site. The salt lake results from a sequestered aquifer whose salinity is likely due to nearby salt deposits. The salt water is not fed by the nearby ocean waters as it is well above sea level and too high for winter storm waves and high tides. Also unique to the site, freshwater springs surfaced near the salt water lake.

#### b. Pre-European: Chowinga/Tongva Village and Industrial Site

The Chowinga/Tongva established a village at the Salt Lake that was likely seasonal. The site was named Onoova-Ngoako, which means "Place of Salt". The Chowinga would collect salt at the site for their use and for trade. During construction of the power plant artifacts were discovered on the site from this occupation period.

#### c. Mid 1800's to early 1900's: Early salt source for City of Los Angeles/Water supply for Redondo

As the local region grew in population, a salt factory was established on the east side of the Salt Lake. Through several owners, this factory was the major source of salt for the growing City of Los Angeles. The primary road between Redondo and Los Angeles was called the Old Salt Road. As salt from other sources became more economical, the salt factory was abandoned. The fresh water springs on the site were used to provide water to the City of Redondo in its early stages, but as the city grew, this source of water went dry.



#### d. 1907: First power plant

The area's first power plant, an Edison plant, was located on the north west corner of the Salt Lake. By 1930, the plant was abandoned as other sources of electricity were more economical.





## The Case Against High Density Residential at the AES Site

### e. 1941: Designation of Salt Lake as Historic Site

The State designated the Salt Lake as a historic site 373.

### f. 1944: Targeted for park site

In the 1940's the community determined that the abandoned Edison plant should be converted to a community center and the Salt Lake and harbor area should be a large public park focused on the Salt Lake.



*1944 Plan to convert the Salt Lake area to a regional park*

### g. 1948: Construction of first units of current power plant

The end of WWII resulted in a population surge in Redondo Beach and the surrounding Beach Cities. New power plants were required to feed the resulting demand for more electricity. Wetlands close to the ocean were targeted for the low cost land and proximity to ocean water for economical cooling. Plans for a regional park were abandoned. The Salt Lake was filled as Southern California Edison began construction of the initial portion of the current AES power plant. The Art Deco/gothic architecture of this older portion of the plant is considered historically significant architecture for the City.

## The Case Against High Density Residential at the AES Site



*Salt Lake location superimposed on power plant. This image shows all units, not just the initial set. Note the oil tanks that were eventually torn down in 2006. The active wetlands are mostly in the tank locations.*

### h. 1960's: Construction of last set of units

As power demand grew and the original plant became outdated, SCE added the last units to the site which were all completed and operational by 1968.

### i. 1980's: Redondo "Fun Park" proposed for AES site

In the 1980's residents drove for replacement of the power plant with a "Fun Park". The resident drive was rejected by SCE.

### j. 2005: Residents vote for parkland at AES site

The City put the future of the AES site to an advisory vote – giving voters two alternatives for the site: parkland with no residential development, or Mixed Use development that would allow up to 350 residential units. Despite biased and deceptive ballot language (see Figure 1), the voters favored the park alternative for the site.

### k. 2006: Oil tanks torn down

The SCE power plant had been converted to natural gas so the original five oil tanks were no longer required. SCE completed removal of the oil tanks by 2006 but left the containment revetments and much of the related infrastructure was abandoned in place.

## The Case Against High Density Residential at the AES Site

### l. 2010 Residents vote to add Park zoning to AES site

The City put “Measure G” to the voters of Redondo. Measure G consisted of new zoning for the harbor area including adding “park” as a permitted use on the AES site. The park zoning component was heavily emphasized in campaign activities for the measure.

### m. 2015: Coastal Commission finds wetland activity

Around 2010, state water control board set shut down dates for the remaining ocean water cooled power plants due to the drastic environmental impact on larval marine life. Current plant owner, AES submitted plans to construct a new power plant that would be air cooled. As the different state agencies deliberated on AES’s application, the Coastal Commission found that wetlands were active on about 6 acres of the AES site, primarily around the old oil tank sites. The Coastal Commission ordered AES to halt dewatering activities. Audubon Society began regular surveillance of birds at the wetlands, identifying over 130 species using the site. It was noted during this surveillance that AES had restarted dewatering. The Coastal Commission demanded AES stop dewatering activities. The wetland activity continues today.



*Canadian Geese landing at AES wetlands. Ruddy ducks are nesting in the wetlands grasses to the left.*

### n. 2018: AES sells property

AES announced the sale of its property to real estate investors. The new buyer committed in writing to offer up to 25 acres of public parkland to the City at a discounted price.

### o. 2018-2019: City successful in start of park funding for AES site

In 2018, the California Coastal Conservancy awarded the City of Redondo Beach a \$500K grant to plan for parkland/wetlands restoration at the AES site. In 2019, California Natural Resources Agency announced the award of \$4.8M grant for the planning and acquisition of parkland at the AES site.

## p. 2020: LA County forms park financing mechanism

LA County formed an Enhanced Infrastructure Financial District to facilitate funding a 25 acres at the AES site. This mechanism would divert a tax increment on County taxes generated around the AES site to fund acquisition and development costs of a public park on the AES site.

This historical track record shows the rich cultural history of the site as well as the repeated commitment of Redondo residents and local and state agencies to parkland uses for this site. **Using this site for high density residential development flies in the face of the recreational potential and historic cultural value of this site to the community and region and ignores the repeated commitment of the community and local and state agencies to invest in the site for this unique recreational and cultural value.**

## 8. Environmental Impacts

The environmental impacts of converting the AES site to high density residential have been documented in preceding paragraphs and in numerous EIR's previously conducted on such uses. To summarize the impacts:

- Cultural impacts in the development over a former Chowinga village, over the state designated historical site of the Salt Lake that was critical to the area, and to the architecture of the original portion of the power plant.
- Environmental impacts to the wetlands and the over 130 species of birds that use the wetlands at the site already.
- Traffic impacts throughout the city
- Coastal access impacts to the harbor for coastal dependent recreational and commercial uses.

## 9. Summary and Conclusions

The AES site has been important to the residents of Redondo since its earliest days. Time and time again, development interests trumped the repeated desire of the community to honor this site with significant parkland and wetland development. Given the proven commitment of the community to cultural, recreational and environmental uses of the site, it is extremely unlikely the community would vote to support a meaningful amount of residential uses of the site. And even if somehow residents rolled over, you still have the Coastal Act and the Coastal Commission. There are far better and less impactful alternatives for high density residential development in the City. The AES site is about as bad a site as you could possibly choose for high density residential. We should not waste everyone's time pursuing this dead end. Let's not add this to the other expensive wastes of time in the harbor area – Heart of the City, Measure B, and the CenterCal Mall. I hope we learn from history rather than repeat it.



To: [cityclerk@redondo.org](mailto:cityclerk@redondo.org)

Re: Agenda item L2 City Council Meeting February 1, 2022

Despite the fact that city residents have spoken loudly in several elections that we do not want to have high density housing on the retiring AES power plant site, once again the people that never met a development that they didn't love are back at it. Redondo Beach has a long history of bowing to over-development focused interests, hence the nickname Condo Redondo as an appropriate moniker for South Redondo Beach.

We are once again confronted with a movement to use as cover the plight of the unhoused and statewide mandates on housing density to push for having over 1000 units build on the location of the AES power plant which is currently zoned only for parkland and/or industrial purposes. South Redondo is one of the most densely populated areas of the South Bay and more high-density housing there would do nothing to alleviate the issues of homelessness.

As a North Redondo District 5 resident, I could easily fall into the trap of NIMBY and say "Great! Go overbuild some more in South Redondo" despite the traffic congestions, overcrowded schools and lack of parkland there. But some things are just not right. The voters of Redondo Beach have made clear in no uncertain terms, even when outspent in ad campaigns by ridiculous amounts, that the AES power plant site should not be zoned as residential property. Mixed use options including recreational facilities, parkland, office building and some modest residential as part of a planned redevelopment of the Waterfront is one thing but the outrageous plans to enrich developers by cramming the majority of required high density housing in the AES site is unconscionable. Those units once permanently build on that land will not help the unhoused, as there is no way they could be made affordable. They will be built as additional playgrounds for the wealthy while the rest of us suffer the consequences.

Coming up with a fair distribution of required increased density housing must be fairly distributed throughout the city including the areas where I reside in district 5. The AES site is not an area that should be considered for such a debacle. The AES site is entirely inappropriate for the purposes of complying with the state mandated criteria for new housing which requires that it be close to easy access mass transit and freeway access. Last I checked, there is no freeway running through South Redondo and it is quite a hike from the waterfront to the closest Green Line stop. The AES site is wetlands and portions of it have been mandated by the CCC to be restored as such. It is a contaminated site which will require tremendous remediation and is not a site that can easily become housing even if we all wanted it to be.

I strongly urge the city council to see this farce for what it is, another attempt by moneyed interests to further the expansion of Condo Redondo and make a few people even richer. This has nothing to do with social justice or helping the unhoused. Just another money grab.

Roger Light, PhD, ABPP/Cn  
3221 Gibson Place  
Redondo Beach, CA 90278



To: [cityclerk@redondo.org](mailto:cityclerk@redondo.org)

Re: Agenda item L2 City Council Meeting February 1, 2022

REGARDING THE OUTRAGEOUS PROPOSAL TO GIVE AWAY THE WATERFRONT TO DEVELOPERS:

The AES power plant site should not be zoned for residential property. This issue has been voted on several times, the will of the citizens of Redondo Beach has been made clear on multiple occasions. Mixed use options including recreational facilities, parkland, office building and some residential as part of a planned redevelopment of the Waterfront is what we voted for. The AES site is clearly inappropriate for new housing which requires easy access mass transit and freeway access. The AES site is wetlands and portions of it have been mandated by the CCC to be restored, further, it is a contaminated site which will require tremendous remediation and is not a site that is appropriate for housing.

South Redondo is one of the most densely populated areas of the South Bay and more high-density housing there would do nothing to alleviate the issues of those in need of shelter. Coming up with a fair distribution of required increased density housing must be fairly distributed throughout the city. The AES site is not an area that should be considered.

Redondo Beach voters made clear in no uncertain terms despite efforts by developers, that the AES power plant site should not be zoned as residential property. The proposal to benefit developers by cramming the majority of required high density housing in the AES site is so transparent. Residential units built on that waterfront site will not help the unhoused because the units would be luxury spots. The only benefit would be to the wealthy and the developers.

The traffic congestions, overcrowded schools and lack of parkland in Redondo Beach should be the top concerns for the council. I strongly urge the city council to protect this valuable and scarce open space.

Dr. Lori Zaremski  
3221 Gibson Place  
Redondo Beach, CA 90278

February 1, 2022

**Written Comment for L.2 PUBLIC HEARING FOR CONSIDERATION OF THE REVISED CITY OF REDONDO BEACH 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN**

*To Redondo Beach city council, Planning staff, and consultants:*

Thank you for the opportunity for the public to review HCD's comment letter and revisit the 6th Cycle Draft Housing Element. I was glad to see that the city council and staff are taking seriously the feedback from HCD and have all intentions of submitting a compliant housing element. As you are aware, there are significant penalties for failing to meet state housing law ([CA.gov](https://www.ca.gov/)).

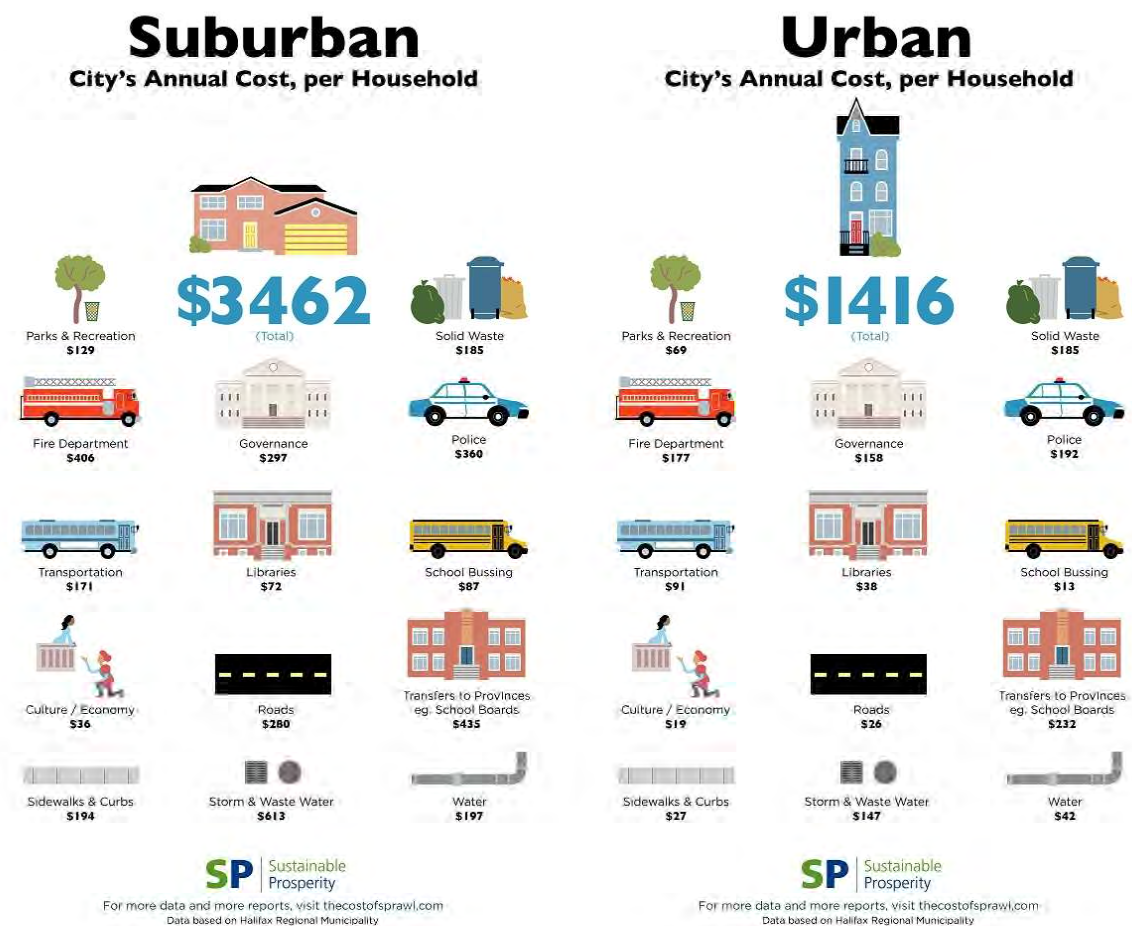
HCD's comment letter reflects the concern that infeasible amounts of housing have been allocated to the periphery of the city. I think it is important that Planning staff and city council **re-evaluate housing sites to better distribute low-income RHNA to other sites**, rather than relegating the vast majority to the North Tech area. I think this was a consensus from your discussion in January. There are numerous environmental justice and public health concerns to placing 900 homes directly adjacent to a freeway, including noise pollution, emissions from vehicle exhaust, and physical separation from schools, services, and other opportunities in the city of Redondo Beach. Air quality officials in CA have repeatedly advised against building homes within 500 feet of a freeway, yet developers in LA and municipalities continue to build next to freeways ([LA Times](https://www.latimes.com)). Living in close proximity to freeways increases one's risk for asthma, cancers, and dementia. We should not be building homes next to freeways and adding to the environmental assault of freeway harms for future generations.

Instead, it would be best to shift low-income RHNA to **locations that would foster transit-oriented development**. This would include expanding the residential overlay at the surface parking lots in the Galleria District, including **near the future Transit Center, at the Living Spaces site, and at the Galleria mall proper**. It appears that in the redevelopment plans for the mall presented by L Catteron in September 2021 ([Urbanize LA](https://www.urbanize.com)), that the plans leave enormous amounts of surface parking—ostensibly to provide space for future development. 300 units at this site with 20% affordable units is a good start, but zoning for more homes (along with increasing height limits and reducing parking requirements) could really activate the site as a hub for transit, work, live, and play. Without this, we are left with more of the same at the Galleria. This area is the ideal place for increasing housing capacity.

I'd like to inquire about and suggest **additional parcels in South Redondo to better meet the goals of affirmatively furthering fair housing and reducing segregation**. Two adjacent parcels on Torrance Blvd consist mainly of surface parking, and together would comprise more than 0.5 acre: **AIN 7506-019-029, 7506-019-001**. This is the site of a mortuary (901 Torrance Blvd). Has the city inquired whether the owner of the site is interested in redeveloping for high-density residential uses? This would be a higher use of the space than asphalt parking that remains empty most of the year. There is already high density housing near this site on Prospect and along Torrance that would indicate feasibility.

Additional parcels in South Redondo are a vacant lot at 412 PCH (AIN 7508-012-009, 7508-012-010). Vacant sites are typically better suited to be developed into low-income housing instead of non-vacant sites, which HCD is looking for. In addition to the project to create supportive housing in South Redondo for homeless services, setting aside parcels for **low-income RHNA in South Redondo would indicate to HCD that the city is committed to AFFH.**

Finally, I'd like to address HCD's comment about fees for multifamily development. Contrary to what you may think, it actually costs **cities less to provide services for households in compact neighborhoods** versus sprawling single-family development ([Streetsblog USA](http://Streetsblog USA)). There is no good justification for charging \$10,000 more per unit for multifamily buildings compared to single family. This is prohibitive to dense development that we should instead be encouraging for multi-generational living and a smaller environmental footprint. I understand many consider Redondo to be "built-out" and there is a considerable amount of dense neighborhoods including R2/R3 configurations. If other cities in California adopted our land use patterns, we would indeed have less sprawl and less of a housing crisis. But we still have a ways to go in improving our land use. Removal of non-zoning constraints to multifamily housing is another way to achieve the goals of AFFH.



Data from a study by the Halifax Regional Municipality (<https://usa.streetsblog.org/wp-content/uploads/sites/5/2015/03/Halifax-data.pdf>).

I think more can be done to **mindfully plan for compact, walkable, transit-oriented neighborhoods** that reduce the cost burden of housing to families and also allow people to move about the city without relying on personal vehicles. This is one of the goals of exercises like the Housing Element and RHNA—to ask cities to re-evaluate land use and plan for smart growth to ensure a livable future.

In addition to the changes you will be making to the Housing Element to be compliant with the law, I ask you to make **meaningful progress on redesigning our streets and transit to accommodate for greater density and reduce car traffic**. We need more protected bike lanes throughout the city (paint is not protection!) and we need to incentivize bike riding by building high-quality bike parking at parks, transit centers, and in housing complexes. All of these goals are in line with the city’s interest in reducing emissions and bolstering resilience for climate change. Ask yourself, what can we do now to make decisions that will make our city better for our children and grandchildren? Parks, trees, green space – all admirable goals of this city council – but their impact is blunted if we don’t plan for more affordable housing, better transit & mobility, and to reverse the effects of exclusionary zoning and segregation.

Thank you,

Brianna Egan, MPH  
District 1 Resident

**From:** LCampeggi

**Sent:** Tuesday, February 1, 2022 2:53 PM

**To:** Eleanor Manzano <[Eleanor.Manzano@redondo.org](mailto:Eleanor.Manzano@redondo.org)>

**Subject:** 02-01-2022 City Council Agenda Item: L.2. 22-3579 PUBLIC HEARING ... REVISED ... 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT...

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

For decades, the TWO districts in the southern part of Redondo Beach have experienced far more housing development and density in a smaller land area than the THREE districts in the northern part of the City. It's time for the Northern part of the City to receive its "fair and equitable share" of new housing distribution to satisfy the RHNA allocations for this cycle.

Voters in Redondo Beach have 5 TIMES rejected the 50-acre power plant site being re-zoned from open space to housing and development. North Redondo resident Dr. Peng writing to the State, asserting the City and the Mayor won't allow housing there is egregiously incorrect. RESIDENTS DON'T WANT HOUSING at that site. Ms. Peng should familiarize herself with the recent voting history of this City, as well as the fact that property the size of where the power plant sits cannot, by City Charter, have a zoning change without a vote of the people. Specifically, it's Article XXVII of the City Charter. Peng might want to question why her Council Member Director from District 5 failed to mention this City law! Both should be accountable to explain why their minority stance should override election results.

To truly be "fair and equitable" with proposed new housing allocations in Redondo Beach as required by this RHNA cycle, it's important to understand the southern part of the City has more than absorbed its share of additional housing, and again, within a smaller land area. This majority Council, along with City Staff, has done an excellent job in reviewing, analyzing and addressing the State's questions and concerns, and is working toward a plan that does just that, while also ensuring the plan could be 100% deliverable, within this RHNA cycle, for the overlay zoning areas recommended (should all landowners decide to develop accordingly).

Note to Council Members Emdee and Horvath ... you already cost taxpayers over \$20 million going against the majority of the people regarding the proposed waterfront project that was not legal, not approved and subsequently withdrawn, thanks in large part to the efforts of the voting public for exposing your failures and anti-resident agenda. You lost your voting-bloc City Council majority last year because of your actions. Now you want to



overturn the voter majority, yet again? What is wrong with you two? The voting majority in Redondo Beach wants the 50-acre power plant property to remain as open space in our park-poor community when the power plant is ultimately retired; working toward a regional amenity for public enjoyment for residents and visitors alike. We elected representation to work toward that goal WITH us, not to work for developers and special-interest groups, or to overturn election results. Congratulations are in order to THIS majority Council for working very, very hard and with City Staff to satisfy both the RHNA objectives and the voting majority.

Lezlie Campeggi  
Redondo Beach

**From:** Amy Josefek

**Sent:** Tuesday, February 1, 2022 2:51 PM

**To:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>

**Subject:** Comment for 2/1/22 City Council meeting re City of Redondo Beach Housing Element

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

As a proud South Bay transplant, I've always been so impressed by and appreciative of the thought that's gone into the planning of Redondo Beach.

Whether it's pushing back against developers who see the active waterfront/pier area as a piggy bank for inappropriate development (really, a movie theatre overlooking the Pacific Ocean?), the emphasis on maintaining open spaces (for both recreation and positive climate effects), and even efforts to reclaim marshlands (that seem to have started doing the work itself, as the lake at the AES site starts to reappear)... it's wonderful to know that not everyone joins with Sacramento legislators who have absolutely no reverence for (or understanding of) the notion that not every square mile of our communities should be turned into highly densified housing.

While no one I know disagrees that there's an affordable housing crisis, the idea that merely packing in more units will lower prices is absurd; it's magical thinking at its worst. Redondo Beach is already an incredibly dense city (currently in the Top 50 most dense in California) and, while it's necessary to fight against the State and its wrongly created RHNA requirements, the idea that RB residents themselves are piling on to densify the waterfront area is beyond depressing.

According to official documents like the census, of the five Districts, THE most densified one is...District #1, which includes the AES site. Of the five, District #5 is the 4th or 5th LEAST densified in the City.

It's not like it would be easy to just snap fingers and turn the AES site into housing, much less affordable housing at that. City wide voters have repeatedly voted against creating housing there.

The waterfront area is the place that attracts tourists and residents alike, putting massive housing on the AES site would create a traffic monstrosity even worse than what currently exists.

Please keep the AES site from becoming the latest casualty in the State's war against our communities. Let it become the wetlands it was "created" to be, and put housing where it can be located near actual access to transportation and highways.

Thank you.  
Amy Josefek

**From:** Pamela Combar  
**Sent:** Tuesday, February 1, 2022 2:59 PM  
**To:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>  
**Subject:** Agenda Item L2 for the city council Meeting 2/1/2022

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There is misinformation regarding the housing element in Redondo Beach. I will only say that to try and allocate the units on the AES is absurd!

It is still commissioned for another 2 years and could be extended!

It is contaminated land!!!

It has been voted on several times by the citizens to NOT PUT HOUSING ON THIS PROPERTY

PLEASE listen t the citizens!!

Sincerely,  
Pamela Combar

From: [Holly Osborne](#)  
To: [CityClerk: Eleanor Manzano](#)  
Cc: [Nils Nehrenheim](#)  
Subject: Blue folder item for Feb. 8 2022 on transit map correction.  
Date: Tuesday, February 8, 2022 9:03:26 AM

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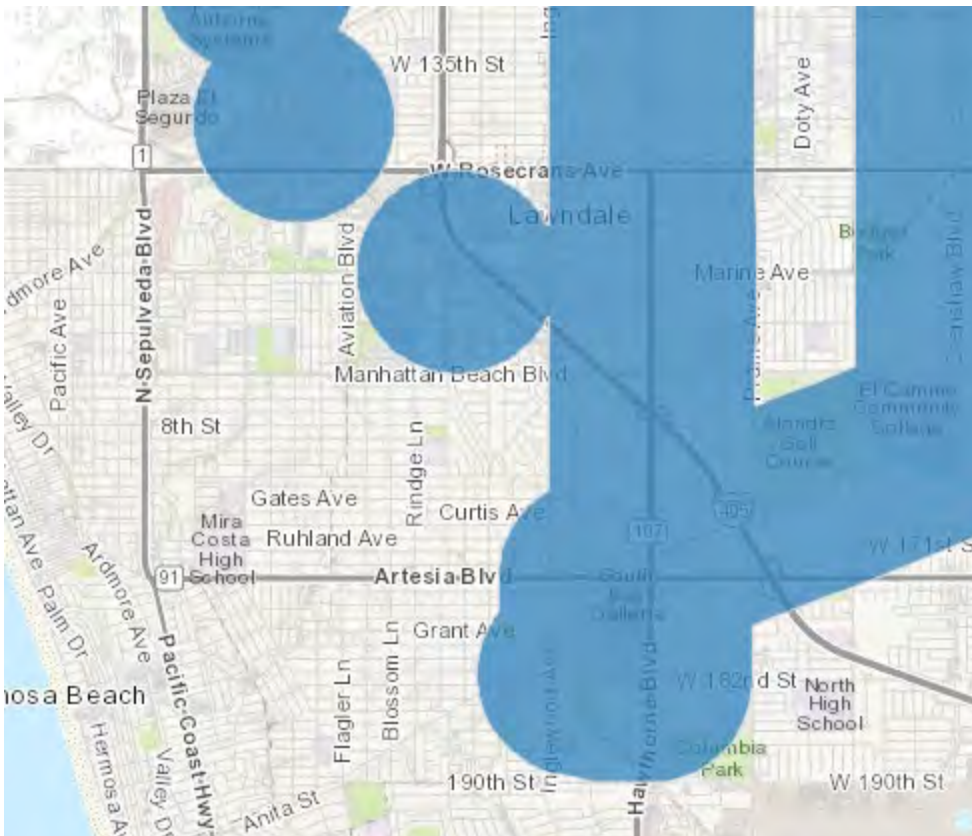
***CAUTION: Email is from an external source; Stop, Look, and Think before opening attachments or links.***

Dear City clerk:

Please submit the following diagrams as a correction to Councilmember Nils Nehrenheim's presentation at the Feb. 1 council meeting. He showed a blue colored map that highlighted the high quality transit areas (HQTA) in Redondo Beach. The version he showed, however was from 2017, and had included two extra Metro Stops.

**The correct screen shot is below; and the link to where this was taken is also given below.**

[https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1\\_1/explore?location=33.881547%2C-118.378615%2C13.00](https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1/explore?location=33.881547%2C-118.378615%2C13.00)



-The correction was made in early 2020, after several correspondences between me and Kevin Kane of SCAG.

The following is part of an email exchange I had with Kevin Kane on this subject. Note that in his color scheme, the yellow is what is retained, and the blue was what he took away. Those two blue areas in his maps represent the two erroneous metro stops.

**From:** Kevin Kane <kane@scag.ca.gov>  
**To:** Holly Osborne  
**Cc:** Regional Housing <Housing@scag.ca.gov>  
**Sent:** Tuesday, February 18, 2020, 11:53:13 AM PST

Holly,

.....

I apologize that I don't have time to make a full map for each city. I'm sharing a quick screenshot of HQTAs in Redondo Beach – the blue represent those used for the draft RHNA methodology (11/7) and the yellow represent those used for the staff-recommended final. The HQTA acreage within Redondo Beach looks to have decreased by 122 acres (15%) and the HQTA population we measure also went down by 1,727 (14%).]

Thanks,

Kevin





Thank you for addressing this matter.

Holly Osborne  
District 5.

From: [Huntley, Robin@HCD](mailto:Huntley.Robin@HCD)  
To: [Sean Scully](#); [Brandy Forbes](#)  
Cc: [Veronica Tam](#)  
Subject: Fw: Redondo Beach Housing Element  
Date: Wednesday, February 2, 2022 7:13:11 AM  
Attachments: [Outlook-bz302t0y.png](#)  
[Redondo Vons Zone of Control.pdf](#)

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

HCD forwards comments received on Redondo Beach's housing element and offers the City an opportunity to respond.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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**From:** Leo Pustilnikov <leo@slhinvestments.com>  
**Sent:** Tuesday, February 1, 2022 9:56 PM  
**To:** Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>  
**Cc:** Dennington, Doug <ddennington@rutan.com>; Howell, Peter <phowell@rutan.com>  
**Subject:** Redondo Beach Housing Element

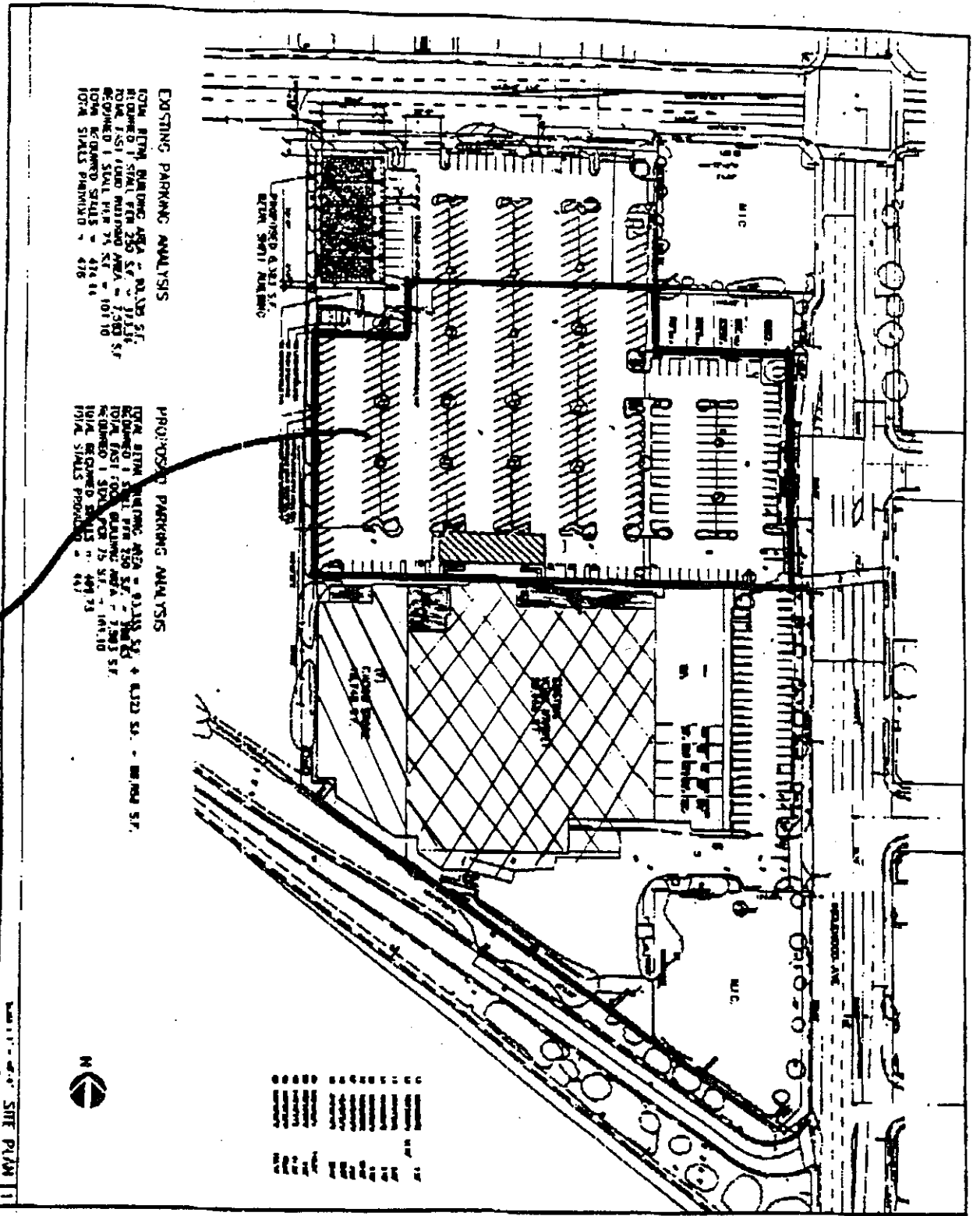
Robin,

FYI, i'm listening to the council discussion and they are talking about building on retail parking lots (eg living spaces and vons) without any proof or confirmation that the retail tenants don't have a tenant control area restricting any such development while the tenant remains in place. For example, attached is the zone of control for the vons site covering the majority of the parking that cannot be developed or altered without vons approval during its lease (which has decades remaining).

At the same time, the city claims 1100 N. Harbor isn't suitable even though I have a study from EFI and AECOM showing all the housing can be developed within the 6th cycle. Separately, there's another site at 1021 N. Harbor which is an acre in size surrounded by housing developed at 70-120 dwelling units per acre requiring no clean up and they are not considering either solely because I own it and at 3:54 into the meeting, the council member for the district said he wants no zoning for the site because it's the only place for a 25 acre park that he doesn't want to pay for.

Let me know if you have any questions.

Best,  
Leo



**EXISTING PARKING ANALYSIS**

EXISTING BUILDING AREA - 10,500 SF.  
 REQUIRED 1 STALL PER 250 SF - 42 STALLS  
 TOTAL EXISTING BUILDING AREA - 10,500 SF.  
 REQUIRED 1 STALL PER 75 SF - 140 STALLS  
 TOTAL EXISTING BUILDING AREA - 414 SF

**PROPOSED PARKING ANALYSIS**

PROPOSED BUILDING AREA - 10,500 SF + 4,320 SF - 14,820 SF.  
 REQUIRED 1 STALL PER 250 SF - 59 STALLS  
 TOTAL PROPOSED BUILDING AREA - 14,820 SF.  
 REQUIRED 1 STALL PER 75 SF - 198 STALLS  
 TOTAL PROPOSED BUILDING AREA - 447 SF

ZONE OF CONTROL

Scale 1" = 40' SITE PLAN



- 1. EXISTING BUILDING
- 2. PROPOSED BUILDING
- 3. EXISTING PARKING STALLS
- 4. PROPOSED PARKING STALLS
- 5. DRIVEWAY
- 6. SIDEWALK
- 7. STREET
- 8. LANDSCAPE
- 9. UTILITY
- 10. SIGNAGE
- 11. FENCE
- 12. BIKE RACKS
- 13. LIGHT FIXTURES
- 14. TREE
- 15. BUSH
- 16. GRASS
- 17. DRIVEWAY
- 18. SIDEWALK
- 19. STREET
- 20. LANDSCAPE
- 21. UTILITY
- 22. SIGNAGE
- 23. FENCE
- 24. BIKE RACKS
- 25. LIGHT FIXTURES
- 26. TREE
- 27. BUSH
- 28. GRASS

**A.300**

**SITE PLAN**

**PROJECT NO. 100118**

**DATE 12/15/10**

**SCALE 1" = 40'**

**PROJECT LOCATION**

**CLIENT**

**DESIGNER**

**ARCHITECT**

**ENGINEER**

**PLANNING**

**LANDSCAPE ARCHITECT**

**INTERIOR ARCHITECT**

**MECHANICAL ENGINEER**

**ELECTRICAL ENGINEER**

**CIVIL ENGINEER**

**ENVIRONMENTAL ENGINEER**

**TRAVEL ENGINEER**

**VEGETATION ENGINEER**

**WATER ENGINEER**

**SOIL ENGINEER**

**SEWER ENGINEER**

**STORMWATER ENGINEER**

**TRAFFIC ENGINEER**

**ACoustics ENGINEER**

**ARCHITECTURAL RENDERING**

**PHOTOGRAPHY**

**VIDEO**

**MODELING**

**CONSTRUCTION ADMINISTRATION**

**GENERAL CONTRACTOR**

**MECHANICAL CONTRACTOR**

**ELECTRICAL CONTRACTOR**

**CIVIL CONTRACTOR**

**LANDSCAPE CONTRACTOR**

**INTERIOR CONTRACTOR**

**MECHANICAL CONTRACTOR**

**ELECTRICAL CONTRACTOR**

**CIVIL CONTRACTOR**

**LANDSCAPE CONTRACTOR**

**INTERIOR CONTRACTOR**

EXHIBIT A TO SHOPPING CENTER LEASE

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0066  
(916) 319-2066  
FAX (916) 319-2166

E-MAIL  
Assemblymember.Muratsuchi@assembly.ca.gov

# Assembly California Legislature

DISTRICT OFFICE  
3424 WEST CARSON STREET, SUITE 450  
TORRANCE, CA 90503  
(310) 375-0691  
FAX (310) 375-8245

  
**AL MURATSUCHI**  
CHAIR, JOINT LEGISLATIVE COMMITTEE ON CLIMATE CHANGE POLICIES  
ASSEMBLYMEMBER, SIXTY-SIXTH DISTRICT

February 10, 2022

Robin Huntley  
Senior Housing Policy Specialist  
California Department of Housing and Community Development  
2020 W. El Camino Avenue, Suite 500  
Sacramento, 95833

Dear Ms. Huntley:

We are aware that Redondo Beach is working closely with Housing and Community Development to craft a certified housing element by amending their zoning ordinances in a way that meets their Regional Housing Needs Allocation and creates opportunities for more affordable housing.

We are supportive of these efforts but are also sensitive to the potential rezoning of the entire 50-acre AES coastal power plant site. We have been assisting the City of Redondo Beach and the County of Los Angeles for several years to restore the wetland at that site and create a regional park and open space amenity for the public. These efforts are ongoing with the assistance of the California Natural Resources Agency, State Coastal Conservancy, Wildlife Conservation Board, and surrounding communities.

Along with the efforts regarding wetland restoration and open space creation for the site that has garnered a number of supportive public votes over the past 20 years, some individuals are advocating for a zoning change to allow for residential development on the site. We are concerned that a blanket zoning change along the lines that some have advocated for taken without the utmost care to ensure wetlands preservation would be inconsistent with the community's long-standing vision for the site and its environmental needs. We would like to work with you to ensure that does not happen.

Thank you for taking our concerns regarding this area of the coast under consideration. We are most hopeful that the City's vision of wetland restoration and park space at the site will finally come to fruition. The community has waited long enough.

Sincerely,



**AL MURATSUCHI**  
Assemblymember, 66<sup>th</sup> District



**BEN ALLEN**  
California State Senator, 26th District



From: [Huntley, Robin@HCD](mailto:Huntley.Robin@HCD)  
To: [Sean Scully](#); [Brandy Forbes](#)  
Cc: [Veronica Tam](#)  
Subject: Fw: Redondo Beach 2021 Housing Element Draft  
Date: Tuesday, December 14, 2021 6:31:13 AM  
Attachments: [Outlook-lbq2uzxz.png](#)  
[Screen Shot 2021-12-13 at 17.51.53.png](#)  
[Screen Shot 2021-12-13 at 18.10.27.png](#)  
[Outlook-i1qxlehs.png](#)

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HCD is forwarding some comments received regarding Redondo Beach's housing element and offers the City the opportunity to respond.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833

**\*\*\*New Phone Number\*\*\* (916) 695-7770**



---

**From:** Grace Peng <spikey@gmail.com>  
**Sent:** Monday, December 13, 2021 6:27 PM  
**To:** Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>; Compliance Review@HCD <compliancereview@hcd.ca.gov>; housing@doj.ca.gov <housing@doj.ca.gov>  
**Cc:** Laura Emdee <laura@emdee.org>  
**Subject:** Re: Redondo Beach 2021 Housing Element Draft

Dear Ms Huntley, HCD Compliance Review and DOJ Housing Task Force,

I am writing to implore you not to accept Redondo Beach's (RB) housing element plan. It's bad enough that RB had previously only allowed new homes to be built along dangerous, noisy, and polluted arterial roads, but they removed mixed use in the whiter and more affluent coastal areas and changed zoning adjacent to the 405 freeway to put all the low income housing right next to the freeway.

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size of units are already onerous and an impediment to housing.

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[https://redondo.legistar.com/MeetingDetail.aspx?ID=894396&GUID=A7117946-3B22-4239-81B8-DD8E1570A145&Options=&Search=\[redondo.legistar.com\]](https://redondo.legistar.com/MeetingDetail.aspx?ID=894396&GUID=A7117946-3B22-4239-81B8-DD8E1570A145&Options=&Search=[redondo.legistar.com])

Items N2 (IZ), N3 (raising Quimby fees) and P2 (removing planning commissioners that followed state law)

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# Administrative Report

P.1., File # 21-3299

Meeting Date: 11/16/2021

**To:** MAYOR AND CITY COUNCIL

**From:** BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR

**TITLE**

DISCUSSION AND POSSIBLE ACTION REGARDING POSSIBLE UPDATES TO REDONDO BEACH HOUSING AND LAND USE REGULATIONS TO MITIGATE THE IMPACTS OF SENATE BILL 9 (SB9)

In short, Redondo Beach leaders have repeatedly shown contempt for state and federal housing laws. Zoning is supposed to protect residents from harm. But, Redondo Beach persists in banning additional homes in the healthiest areas while forcing future residents to live in the most polluted and dangerous areas next to freeways and 40 mph truck routes.

Please, please, take zoning decisions away from Redondo Beach officials. They cannot be trusted to act in the public interest.

Sincerely,  
Grace Peng, PhD  
24 year Redondo Beach resident

On Fri, Sep 3, 2021 at 2:34 PM Huntley, Robin@HCD <[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)> wrote:

Thank you for your comments. A letter you wrote to Mayor Bill Brand on April 10, 2021 was forwarded to HCD on May 20, 2021 and those comments were considered during our review of the draft element. Unfortunately, we were unable to consider your September 3, 2021 email comments. We will, however, consider them during our next review of the housing element.

I've attached HCD's findings on Redondo Beach's draft housing element. I am currently on vacation and will return to the office on September 16. I can respond to any additional comments you have at that time.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833

**\*\*\*New Phone Number\*\*\* (916) 695-7770**



[\[landlordtenant.dre.ca.gov\]](http://landlordtenant.dre.ca.gov)

---

**From:** Grace Peng <[spikey@gmail.com](mailto:spikey@gmail.com)>  
**Sent:** Friday, September 3, 2021 12:13 PM  
**To:** Huntley, Robin@HCD <[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)>  
**Cc:** Laura Emdee <[laura@emdee.org](mailto:laura@emdee.org)>  
**Subject:** Redondo Beach 2021 Housing Element Draft

Dear Ms Huntley,

I am a LWV volunteer in Redondo Beach, CA who is serving as our housing element watchdog.

I saw on the HCD website that the RB HE is in review.

My council member, Laura Emdee, told me that you had disallowed at least one site as unrealistic for Lower Income housing. Did you write a letter to them? Can I see which sites you disallowed and which ones are still under review?

By the way, I find the drafts of the 2021 RB HEs wholly inadequate and in violation of AFFH. The idea that all of our Very Low Income housing will be relegated to one site, next to the freeway, is a clear violation.

I used the draft housing element for my GIS 5 class capstone project. I demonstrated how bad the RB HE is in terms of meeting the basic needs of people who live there. (The file is large, but you can view/download it at this link.)  
<https://docs.google.com/document/d/1oXK6dd5PvaRD6foNHXk6qSxu3C3EtoqdoNTKq1qGAzI/edit?usp=sharing> [docs.google.com]

Children should not be subjected to walking along 40 mph truck routes and crossing freeway on/off-ramps with 50,000+ cars/day to get to the closest elementary school, 1.25 miles away. People should never be put right next to the freeway, especially one of the busiest freeways in the US. Over 250,000 vehicles cross that site every day.

As an atmospheric scientist, I find this unconscionable. We have plenty of room in this city if we don't treat lower income people like toxic waste.

I know you have to rule based on the law. The strongest argument is that the 2021 RB draft HE puts nearly all of the lower income children in Adams Middle School, which already enrolls over twice as many poor children as Parras Middle School.

The only High School in our district is in South RB and the bus system is already inadequate. The school district can't afford to run school buses so it's outsourced to Beach Cities Transit, which has a very small fleet of 32-40 seat buses. The route that serves the HS fills up so that there is not even standing room left when it is ~30% through the route, a full 3 miles from campus. I know because my child was frequently passed up by the full buses. This is a disparate impact on families that do not have access to cars.

Moreover, this draft RB HE removes ~1000 sites that were available in the 2014 HE, and bans housing on available large parcels in South Redondo Beach, where the owners want to build housing.

- Beach Cities Health District wants to build up to 600 units off senior apartments at an 11 acre closed hospital. The city won't let them.
- The owner of the site occupied by the soon-to-close AES power plant wants to build housing and the city won't let him.

In summary, can you send me your comments to RB on their draft 2021 HE?

If you have any questions about my analysis, please don't hesitate to contact me. My personal email is [spikey@gmail.com](mailto:spikey@gmail.com) and my cell is 310-613-7432.

Sincerely,  
Grace Peng, PhD



From: [Huntley, Robin@HCD](mailto:Huntley_Robin@HCD)  
To: [Mike Witzansky](#); [Sean Scully](#); [Brandy Forbes](#)  
Cc: [Veronica Tam](#)  
Subject: Fw: Redondo Beach 2021 Housing Element Draft  
Date: Friday, January 21, 2022 2:51:32 PM  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[Outlook-p0scrpth.png](#)  
[HCD 2022-01 letter.pdf](#)

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

Please see the attached comments from Grace Peng. HCD offers Redondo Beach the opportunity to respond.

As a reminder, HCD considers comments from all third party commenters when reviewing housing elements.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



---

**From:** Grace Peng <[spikey@gmail.com](mailto:spikey@gmail.com)>  
**Sent:** Friday, January 21, 2022 2:33 PM  
**To:** housing <[housing@doj.ca.gov](mailto:housing@doj.ca.gov)>  
**Cc:** Huntley, Robin@HCD <[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)>; Compliance Review@HCD <[compliance@hcd.ca.gov](mailto:compliance@hcd.ca.gov)>; Laura Emdee <[laura@emdee.org](mailto:laura@emdee.org)>  
**Subject:** Re: Redondo Beach 2021 Housing Element Draft

Dear Ms Huntley,

I am sorry to report that my hometown of Redondo Beach is still trying to suppress housing production while telling HCD otherwise.

See the attached letter.

Grace

[https://docs.google.com/document/d/1DC6O8ZzJSJGuoegljkorPo\\_on1bNYf7nazJMNhnl4I/edit?usp=sharing](https://docs.google.com/document/d/1DC6O8ZzJSJGuoegljkorPo_on1bNYf7nazJMNhnl4I/edit?usp=sharing)  
[\[docs.google.com\]](#)

On Fri, Dec 24, 2021 at 8:20 AM housing <[housing@doj.ca.gov](mailto:housing@doj.ca.gov)> wrote:

Dear Grace,

Thank you for your e-mail and for including the Department of Justice in your communication.

We acknowledge receiving your original email and will note for our records but have deferred to HCD, the primary state agency that is addressing your concerns and is already handling your situation. Thank you.

Office of the Attorney General | Department of Justice | State of California  
1300 I Street, Sacramento, CA 95814 | Email: [housing@doj.ca.gov](mailto:housing@doj.ca.gov) | Housing Portal: [oag.ca.gov/housing](http://oag.ca.gov/housing) [[oag.ca.gov](http://oag.ca.gov)]

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**From:** Huntley, Robin@HCD <[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)>  
**Sent:** Tuesday, December 14, 2021 6:26 AM

**To:** Grace Peng <[spikey@gmail.com](mailto:spikey@gmail.com)>; Compliance Review@HCD <[compliancereview@hcd.ca.gov](mailto:compliancereview@hcd.ca.gov)>; housing <[housing@doj.ca.gov](mailto:housing@doj.ca.gov)>  
**Cc:** Laura Emdee <[laura@emdee.org](mailto:laura@emdee.org)>  
**Subject:** Re: Redondo Beach 2021 Housing Element Draft

**EXTERNAL EMAIL:** This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

Thank you for your additional comments, Grace. HCD will consider them while continuing to review Redondo Beach's adopted housing element. HCD's findings letter is due January 5, 2022.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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## Administrative Report

P.1., File # 21-3299

Meeting Date: 11/16/2021

To: MAYOR AND CITY COUNCIL

From: BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR

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In short, Redondo Beach leaders have repeatedly shown contempt for state and federal housing laws. Zoning is supposed to protect residents from harm. But, Redondo Beach persists in banning additional homes in the healthiest areas while forcing future residents to live in the most polluted and dangerous areas next to freeways and 40 mph truck routes.

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**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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In summary, can you send me your comments to RB on their draft 2021 HE?

If you have any questions about my analysis, please don't hesitate to contact me. My personal email is [spikey@gmail.com](mailto:spikey@gmail.com) and my cell is 310-613-7432.

Sincerely,  
Grace Peng, PhD

CONFIDENTIALITY NOTICE: This communication with its contents may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.



January 22, 2022

Robin Huntley  
State of California  
Department of Housing and Community Development  
2020 West El Camino Blvd, Ste 500  
Sacramento, CA 95833

Dear Ms Huntley,

I am writing today to alert you to all the ways that Redondo Beach is trying to stifle housing production while telling your office otherwise.

At the Redondo Beach city council meeting 2022-01-13, by a vote of 3/2, RBCC voted to resubmit our previously rejected HE “with more narrative” but without adding any sites.

This is a violation of AFFH because all of the major sites in the HE are north of 190th and zoned for Adams Middle School, which already has 3x the low income students as Parras MS. The HE also puts most of the new housing in areas that feed into Washington and Lincoln ES. Washington has the second highest % low-income students in the city and would be absolutely swamped. AFFH requires that the low-income students be placed throughout the city, and in higher numbers near schools that currently have fewer low-income students.

2020 Student Populations:

Proposed RBHE would direct new students to highlighted schools

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

(As a mom/school volunteer who sent my child to Madison ES and Adams MS, which have the highest proportions of low-income and at-risk children in the district, I learned first-hand how much easier it is to meet the needs of all the kids when the Title I population was reduced from 40% to 30%. Title I children need special support, and it is best to spread the work around.)

RB Council Member Zein Obagi Jr says that it is right to put housing on the periphery of the city because it will result in the lowest “traffic congestion in the interior of the city”. He made the fallacious argument that VMT in the interior of the city is all that matters. That also implies that new residents at the periphery won’t have any business in the city.

Traffic flows both ways. The spatial mismatch between jobs and housing, and between where children live and existing schools generates traffic. City of Redondo Beach research shows that 30% of our morning and afternoon traffic is due to student dropoff/pickup. Putting new housing walking distance to elementary schools reduces traffic and VMT.

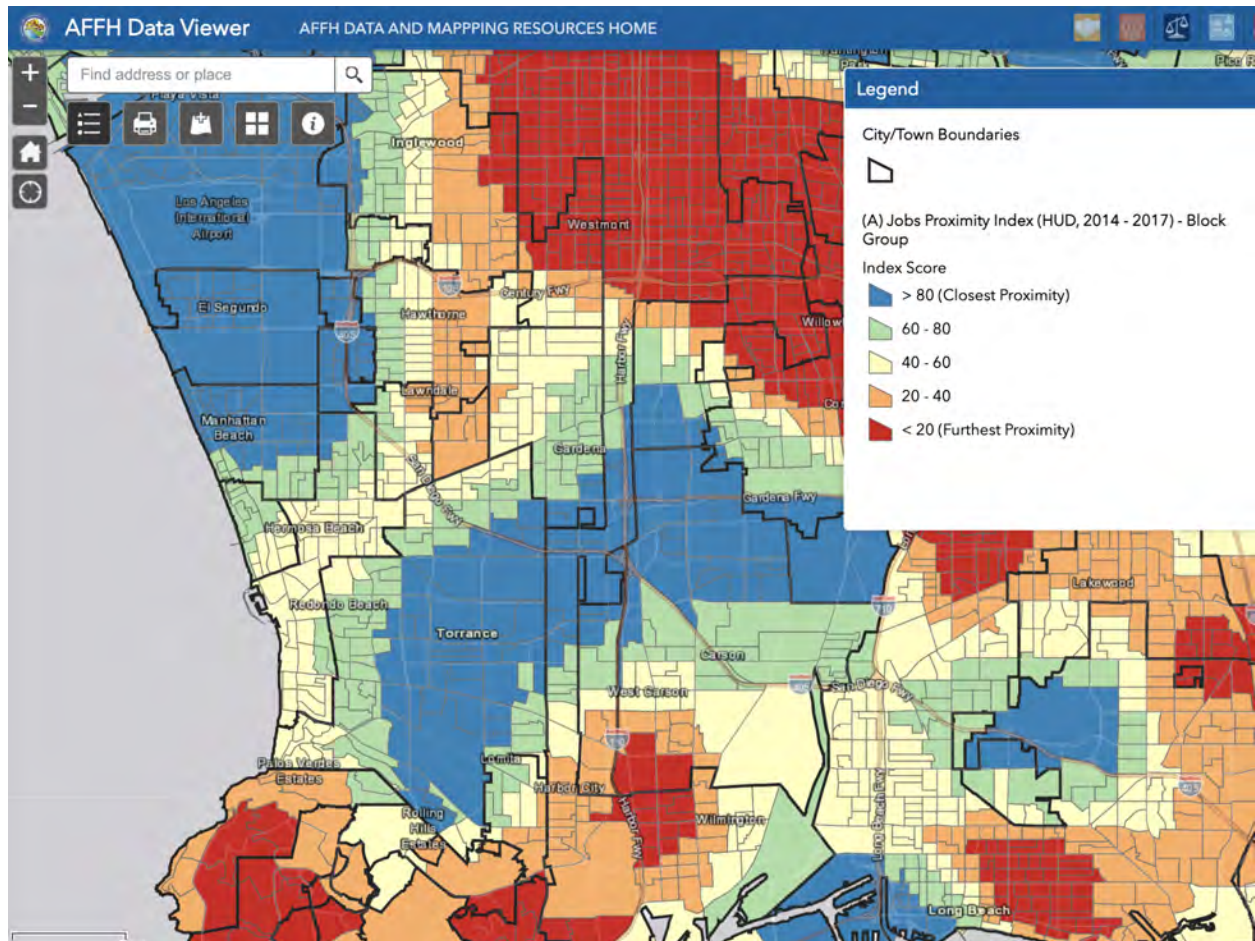
CM Zein Obagi Jr also said that there will never be low income housing by the beach. That is not true. Half a century ago, we built subsidized housing right next to the beach adjacent to Veterans Park. We can do it again.

Our city is a significant job center. The coast is a state park and a regional tourist destination. The area is built on the backs of an army of low-income workers coming in to cook, clean and take care of our children and elderly. Provisioning housing for our workers would reduce traffic, not generate it. *Conveniently putting low-income housing near low-income jobs would also put low-income students in the schools with the lowest current enrollment, spreading the benefits and burdens of a diverse student populace more evenly.*

Furthermore, South RB borders the 7th largest job center in LA County, Torrance-Carson. NRB borders the 3rd largest. Currently, SRB is home to physicians who work at the 3 hospitals in Torrance-Harbor City. But it could also be home to nurses, assistants, technicians and janitors as well. With a little bit of street engineering to provide safe micro-mobility, hundreds of thousands of jobs can be made accessible without a car in a 5 mile radius. Redondo Beach adopted the South Bay Bicycle Master Plan in 2011 but has only built a small portion of it. If they completed it, with safe connections across busy arterial roads, VMT could be drastically lowered for new and existing residents.

Detail from

<https://www.arcgis.com/apps/webappviewer/index.html?id=4d43b384957d4366b09aeeae3c5a1f60>



South Bay Cities Council of Governments Local Travel Network Storymap

<https://storymaps.arcgis.com/stories/157cffcbae244fa39eb5b22c9575e563>

(That's me in blue on the eBike.)

South Bay Bicycle Master Plan

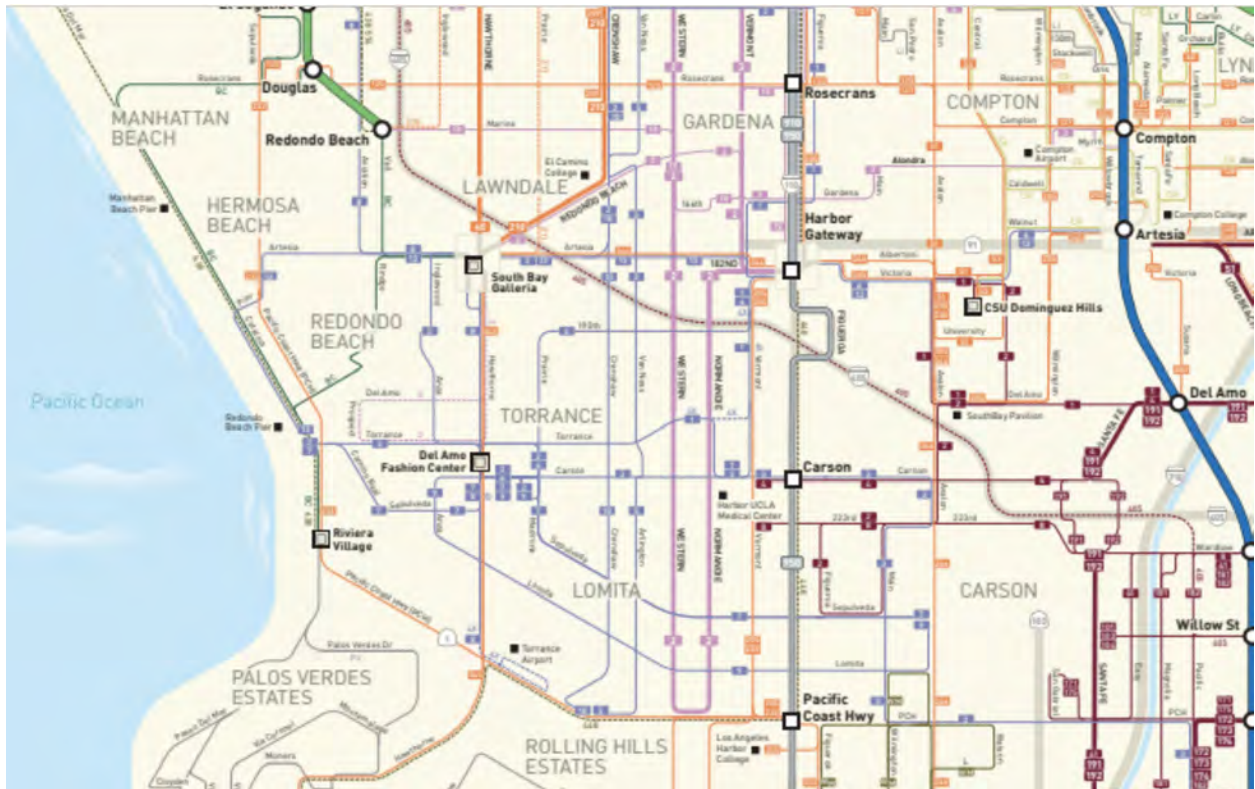
[https://bchd.org/docs/healthy-communities/South\\_Bay\\_BMP\\_Draft\\_Final\\_Plan.pdf](https://bchd.org/docs/healthy-communities/South_Bay_BMP_Draft_Final_Plan.pdf)

South RB is not a transit desert. It is served by a range of bus lines that run every 30-60 minutes throughout the day and evening. Bus Rapid Transit (BRT) line running down the I-110 freeway (Silver Line on map) connects South Bay residents to DTLA; it's faster than driving and parking. NRB is currently served by a frequent Beach Cities Transit line that connects residential neighborhoods to the light rail station at the NE corner of the city (Green Line). Not offering a similar service connecting SRB to the high-frequency bus lines on Hawthorne, Crenshaw, or the BRT on I-110 is a policy choice that can be changed.



Detail from LA Metro transit agency map:

[https://www.dropbox.com/s/metqgthmd5ufgsk/22-1011\\_web\\_MSysMap3\\_SoBayGateway\\_35x17\\_DCR-2.pdf?dl=0](https://www.dropbox.com/s/metqgthmd5ufgsk/22-1011_web_MSysMap3_SoBayGateway_35x17_DCR-2.pdf?dl=0)



The city is still trying new ways to suppress housing by making it infeasible. On January 12, 2022, Brandy Forbes held a Zoom meeting about revising RB's Residential Design Guidelines. Under the guise of making our standards more objective, she asked a series of leading questions. Current rules allow this, should we limit this? In every instance, she asked if people wanted to lower our allowable building envelopes even further.

For instance, our current residential height limit is 30' and 2 stories. Our city used to permit mid-rise apartment buildings of ~10 stories. Some homes under the current 30' limit have a 3rd mezzanine level, which could support creation of ADUs inside existing building envelopes. Without mentioning ADUs, Brandy Forbes asked if we should ban it, allow it under certain circumstances, or leave the rule alone.

She also talked about partial basements that are common on sloped parcels. Currently, they can add extra living space while staying below the 30' height limit. Again, she never mentioned ADUs. But she said that they can be damaging to the area — without proof — and asked if we should limit or ban that also.

She did the same for living space cantilevered over garages and driveways.

The city is telling you that ADU production will increase and it will be affordable, while they are trying to decrease the amount of allowable volume for homes that can be retrofitted to provide ADUs in their existing volume.

Redondo Beach leadership has no plan to meet our obligation to the region to build our fair share of housing. In fact, by adopting inclusionary zoning, doubling Quimby fees, and ratcheting down building volumes they are using the entire playbook of housing suppression techniques. Please do not certify the City of Redondo Beach's Housing Element.

Grace Peng, PhD  
Redondo Beach resident



From: [Huntley, Robin@HCD](mailto:Huntley.Robin@HCD)  
To: [Sean Scully](#); [Brandy Forbes](#)  
Cc: [Veronica Tam](#)  
Subject: Fw: Rezoning the retiring AES power plant for high density housing  
Date: Monday, February 7, 2022 7:30:06 AM  
Attachments: [Outlook-d5vkqewt.png](#)  
[AES power plant site for high density housing HCD letter.docx](#)

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HCD forwards comments received regarding Redondo Beach's housing element and offers the City the opportunity to respond.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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**From:** Roger Light <[rogerlight1@gmail.com](mailto:rogerlight1@gmail.com)>  
**Sent:** Friday, February 4, 2022 11:21 AM  
**To:** Huntley, Robin@HCD <[Robin.Huntley@hcd.ca.gov](mailto:Robin.Huntley@hcd.ca.gov)>; Housing Elements@HCD <[HousingElements@hcd.ca.gov](mailto:HousingElements@hcd.ca.gov)>  
**Subject:** Rezoning the retiring AES power plant for high density housing

Dear Housing and Community Development Team:

Please consider my attached letter when deliberating on the proposal to rezone the retiring Redondo Beach AES power plant for high density housing as this, even if were feasible, would do absolutely nothing to assist the unhoused.

Roger Light, PhD, ABPP/CN  
3221 Gibson Pl, Redondo Beach, CA 90278

From: [Huntley, Robin@HCD](mailto:Huntley.Robin@HCD)  
To: [Sean Scully](mailto:Sean.Scully@HCD); [Brandy Forbes](mailto:Brandy.Forbes@HCD)  
Cc: [Veronica Tam](mailto:Veronica.Tam@HCD)  
Subject: Fw: Residential Development on AES Power Plant Site, Redondo Beach  
Date: Monday, February 7, 2022 7:37:59 AM  
Attachments: [Outlook-azwt4aia.png](#)

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HCD received these comments regarding Redondo Beach's housing element and offers the City the opportunity to respond.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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**From:** Dawn Esser <esserla@verizon.net>  
**Sent:** Sunday, February 6, 2022 5:11 PM  
**To:** Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>  
**Subject:** Residential Development on AES Power Plant Site, Redondo Beach

Dear Ms. Huntley:

I am a 33-year resident of Redondo Beach and a 12-year resident activist. I and the majority of the Redondo Beach residents are against residential development on the AES power plant site. The two council members and the developer pushing for residential development are doing so against the wishes of the residents and the financial benefit of the City due to the following facts:

1) The majority of the residents voted down residential development on the site only a few years ago when Measure B which called for the building of 650 units on the site was defeated. I personally spoke with thousands of residents to educate them on this measure, so I know how emotionally and emphatically they are against residential development on this site due to traffic, over-crowding of schools, and the negative financial impact residential development has on the City in the long run. Residents do not want our City to turn into a Santa Monica.

2) Residents are running to sign the active petition against SB9 overdevelopment. They are sickened with this law that is clearly a push for more revenues for developers and not for affordable housing since it does not include an affordable housing requirement. Residents do not want condo boxes put up next to them. They are upset about no parking requirements with this law, over-crowding of our schools, traffic, and all the negative quality of life that goes with over-development. The fact that Sacramento passed such a law without allowing voters to vote, and not including affordable housing as a requirement is so irresponsible words cannot express! That is the pulse of residents on this law.

3) Redondo has emphasized residential development for 40+ years from past council and city leadership to the financial detriment of the City. I was on the Budget and Finance Committee for three years and involved in reviewing three years of budgets, so I do know how fragile this City's finances are. We are in a disparate need of higher revenues that can only come from commercial development. I believe the statistic is over 85% of residents travel out of this City for work, making traffic gridlock on the majority of street arteries, like PCH by the AES site. The AES site is the only available property where major commercial development can happen. This is a perfect site for a "Google" type campus to be developed with surrounding supporting businesses. This City needs businesses to supply needed jobs, employ more residents, and balance out the traffic patterns and gridlock on our streets. Residential development costs the City financially due to the majority of our property taxes going to the County and State, and the massive increase in costs to the City for residential services (schools, fire, police, trash, sewer, community services).

4) Residents want a significant park on this site and have voted many times for this. Residents voted for a park through a City wide advisory, the site is zoned for a park, and the City has received millions in funds from the County to restore wetlands and support a park on the site.

In summary, it is very irresponsible for council members to support residential over commercial development on this site due to the fact that it is against what the majority of the residents want and it is financially detrimental to the City. The developer is of course pushing for residential since it is more profitable. I am asking you to please look into all these issues when reviewing the future housing plans for Redondo.

Thank you, Dawn Esser

To: [Robin.huntley@hcd.ca.gov](mailto:Robin.huntley@hcd.ca.gov)  
[Housingelements@hcd.ca.gov](mailto:Housingelements@hcd.ca.gov)

Re: A recent proposal by the minority of Redondo Beach council persons to force re-zoning for high density housing at the beachside retiring AES power plant in South Redondo Beach.

Dear Housing and Community Development staff:

I am a long time Redondo Beach resident that have been fighting for years to ensure that the power plant that mars the jewel of a city be decommissioned which will finally happen soon. Me and many others have fought equally hard to ensure that this area that is actually repurposed wetlands be thoughtfully managed once the power plant is gone. South Redondo Beach is one of the most densely populated areas of our region and the area is now zoned only for recreational purposes and parkland. Any changes in zoning must be carefully and thoughtfully considered. The proposal to open this area for the wonton development of high density housing by a small group of residents is a reaction to anger at having some solutions to house the unhoused in their portions of the city.

Even though the majority of Redondo Beach city residents have spoken loudly in four separate elections that most do not want to have high density housing on the retiring AES power plant site, once again wealthy developers that have never met a development that they didn't love are back attempting to do just that, this time under the cover of the fallacy that this will somehow help the unhoused.

Redondo Beach has a long history of kowtowing to over-development focused interests, which has resulted in the unfortunately well-earned nickname "Condo Redondo" as an appropriate moniker for South Redondo Beach.

We are once again confronted with a movement to use as a disingenuous cover the plight of the unhoused and statewide mandates on housing density to push for having over 1000 units build on the location of the AES power plant which is currently zoned only for parkland and/or recreational purposes. South Redondo is one of the most densely populated areas of the South Bay and more high-density housing there would do nothing to alleviate the issues of homelessness.

As a North Redondo District 5 resident far removed from this waterfront area, I could easily fall into the trap of NIMBY [Not in my backyard] and say "Great! Go overbuild some more in South Redondo" despite the traffic congestions, overcrowded schools, and lack of parkland there. But some things are just not right! All of those that are pushing for this zoning change are from our North Redondo area and are working to exploit division in our community.

The voters of Redondo Beach have made clear in no uncertain terms, even when outspent in ad campaigns by ridiculous amounts, that the AES power plant site should not be zoned as residential property. Mixed use options including recreational facilities, parkland, office building and some modest residential development as part of a planned redevelopment of the Waterfront is one thing but the outrageous plans to enrich already wealthy developers by cramming the majority of required high density housing in the AES site is unconscionable. Those units once permanently build on that land will not help the unhoused, as there is no way they could be made even remotely affordable. They will be built as additional playgrounds for the wealthy while the rest of us suffer the consequences.

Coming up with a fair distribution of required increased density housing must be fairly distributed throughout the city including the areas where I reside in district 5. To argue anything else given the relative density of North and South Redondo is impossible to justify with a straight face.

The AES site is not an area that should be considered for such a debacle. The AES site is entirely inappropriate for the purposes of complying with state mandated criteria for new housing which requires that such new developments be close to easy access mass transit and freeway access. Last I checked, there is no freeway running through South Redondo and it is quite a hike from the waterfront to the

closest Green Line (transit) stop. The AES site is wetlands and portions of it have been mandated by the California Coastal Commission to be restored as such. It is a contaminated site which will require a tremendous amount of remediation to make safe and is not a site that can easily become housing even if we all wanted it to be. It is unreasonable to even propose that the site could provide affordable housing this cycle.

I strongly urge the HCD to see this farce for what it is, another attempt by moneyed interests to further the expansion of Condo Redondo aka South Redondo and make a few people even richer. This has nothing to do with social justice or helping the unhoused. Just another money grab.

Respectfully,

Roger Light, PhD, ABPP/Cn  
3221 Gibson Place  
Redondo Beach, CA 90278



From: [Huntley, Robin@HCD](mailto:Huntley.Robin@HCD)  
To: [Sean Scully](mailto:Sean.Scully@HCD); [Brandy Forbes](mailto:Brandy.Forbes@HCD)  
Cc: [Veronica Tam](mailto:Veronica.Tam@HCD)  
Subject: Fw: Redondo Beach 2021-2022 Housing Element Plan  
Date: Thursday, February 10, 2022 7:02:33 AM  
Attachments: [Emdee-HCDAgreesWithD5-01-07-2022 \(2\).png](#)  
[Outlook-drh2ls2.png](#)

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Please see comments below that were submitted to HCD regarding Redondo Beach's housing element. HCD offers the City the opportunity to respond.

Robin Huntley  
Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833  
**\*\*\*New Phone Number\*\*\* (916) 695-7770**



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**From:** LCampeggi <lcampeggi@aol.com>  
**Sent:** Wednesday, February 9, 2022 9:23 PM  
**To:** Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>; Coy, Melinda@HCD <Melinda.Coy@hcd.ca.gov>; Kirkeby, Megan@HCD <Megan.Kirkeby@hcd.ca.gov>; McDougall, Paul@HCD <Paul.McDougall@hcd.ca.gov>; Buckley, Tyrone@HCD <Tyrone.Buckley@hcd.ca.gov>  
**Subject:** Redondo Beach 2021-2022 Housing Element Plan

Dear Sirs, Madams:

I am writing to you as a long time resident of Redondo Beach, very concerned with the housing element requirements for our City. My first comment is a question related to letters mentioned in your correspondence to the first City of Redondo Beach HCD Plan submittal: Why, and what weight, if any, did you give to them? It's fairly common that people speak up when they disagree. However, when people AGREE with decisions made, and in this case, the HCD Plan that was discussed by the Redondo Beach City Council at length, they don't voice their concurrence. People in agreement allow the Plan to stand as submitted, without further comment.

While you do reference the City might have needed to provide more time for public comment, by what standard will you measure those who remain in agreement with the revised Plan, and accept the further clarification and/or changes you require? Surely you can't possibly expect every constituent in Redondo Beach to write to you with their concurrence! That's what we elect our officials for; to make decisions on

our behalf. We only challenge them when we disagree. The handful of correspondence you received that cited opposition to the Plan submitted is just that, a handful, not a majority representation of the approximate 67,000+ people who live in our City.

You should also know that your letter to the City of Redondo Beach asking for clarification and re-addressing certain components is being politically positioned by a small group as your agreement with the District 5 of the City of Redondo Beach. Yet the correspondence you mentioned in your response to the City referenced only ONE letter from a Redondo Beach District 5 resident. In reviewing your response to the City, nowhere did I see that you AGREE with the correspondence received. Nowhere did I see you term the Plan submitted “completely inequitable and unreasonable” but rather, have asked for clarification and/or changes based on your own determining factors and requirements.



I'm certain you will also notice in this excerpt of the blog (above) written by the Redondo Beach District 5 City Council Member, an underlying theme to stoke fear of non-compliance when the City of Redondo Beach has given no indication they will not be working very hard toward a Plan that becomes acceptable. With 126 of 128 cities NOT having their first pass Plan accepted, surely the HCD recognizes the complexity involved and might not appreciate being labeled as AGREEING with a handful of people who wrote letters; might not appreciate being used as a pawn for their political posturing, and especially from a Council Member who lives in the least housing-dense district in the City that happens to be closest to the major metro transportation hubs. Deflection of her own NIMBYism appears to be alive and well.

Here's what you should know:

- 1) Voters in Redondo Beach have 5 TIMES rejected the 50-acre power plant site being re-zoned from open space to housing and development. Correspondence you received from Dr. Peng saying the City won't allow it is incorrect. RESIDENTS DON'T WANT IT, VOTED AGAINST IT.

- 2) The power plant site does NOT fit the HCD criteria for new affordable housing to be located in close proximity to metro, public transportation hubs.
- 3) The City of Redondo Beach comprises 5 districts, 3 of which are known as North Redondo Beach. There is MORE LAND MASS available in the 3 NORTH Redondo districts than in the 2 southern districts.
- 4) South Redondo Beach has abundance of multi-story, multi-unit housing; far greater and within a smaller footprint than exists in North Redondo Beach. “Fair and equitable” would actually be for North Redondo Beach to finally build to the same housing growth and density as the southern part of the City. District 5 has two housing complexes with more than 40 units, District 4 has two or three, and District 3 has NONE!!! Districts 1 and 2 have dozens, many of which are 70 dwellings per acre buildings.
- 5) The 50-acre power plant site is NOT DELIVERABLE as a contender for this RHNA cycle. The land owner reneged on an agreement with the City to sell us 25 acres for a park when he found out he could pocket millions of dollars to extend the operation of the power plant. Not only was it extended, but the owner (Leonid Pustilnikov) lobbied the State Water Board to extend the power plant operation for another two years as well! The current contract is now good through December 2023, and will likely be considered for yet another extension. To advocate overlay zoning for housing at this site, at this time, is not only unreliable, but a thinly-disguised attempt to OVERTURN what voters decided numerous times at the ballot box in Redondo Beach. Further, the California Coastal Commission has determined 6 acres of the site to be restored as Wetlands. The entire property would need YEARS of remediation, after the power plant finally ceases operation. Dr. Peng’s assertion in a prior letter to you that the site is currently being remediated is patently false; she is a chemist residing in North Redondo Beach, not an employee or representative of the power plant or its property owner. Her assertion that the City won’t let the owner build housing there is also inaccurate. The City Charter requires a vote of the people to re-zone a property of that size. Also, there is NO VIABLE SEWER OR WATER INFRASTRUCTURE within the power plant site to support housing. It’s also the only space left in the entire City for a Community/Regional park that would draw people from all over to a Coastal Amenity to enjoy.
- 6) Ms. Peng’s statement in a prior email to you that the City won’t let the Beach Cities Health District (BCHD) build 600 units of senior apartments on their 11 acre site in District 3, is also false. BCHD is currently in the process of developing a plan for senior-assisted living housing, and other medical and recreational uses at their site. NO PLAN HAS BEEN SUBMITTED to the City for ANY consideration.
- 7) Correspondence you received from Leonid Pustilnikov, one of the power plant property owners, is self-serving. For him to suggest the City is not conducting itself lawfully regarding his property is 100% false. Mr. Pustilnikov knowingly purchased a 50-acre property zoned for open space, with a conditional use permit to operate a power plant. That status has not changed. It’s also important to note that his property is in the Coastal Zone, with requirements under the purview of the California Coastal Commission. Mr. Pustilnikov reversed his intent to sell the City of Redondo Beach 25 acres of the

property for a park when the State Water Board and SCE identified the power plant as one to possibly be extended beyond its original sunset date. He lobbied hard for that extension. Now he all of a sudden wants to jump on a housing overlay for his property, something he pursued AT THE SAME TIME he was lobbying the State to extend the operation of the power plant! But in the interim, if the State were to deem it necessary to have 50-acre pig farms in suburban cities and pay millions for them, no doubt he'd be on board with THAT instead.

For decades, the southern part of Redondo Beach experienced far more housing development density in a smaller land area than the northern part of the City. It's time for the Northern part of the City to receive its "fair and equitable share" of new housing distribution to satisfy the RHNA allocations for this cycle. An "even distribution" among all City districts is not plausible given the available land and their current uses, would not match the HCD requirements, and would continue decades of unfair housing distribution in the southern section of the City.

I am a Southern California native and 31 year resident of Redondo Beach. I purchased my first home in Redondo Beach in 1991, in District 4 which is North Redondo Beach. I chose that location based on its proximity to public transportation, shopping, convenience and local parks. In 1996, I sold that home and purchased a bigger one, in District 5 in North Redondo Beach where there was more land per dwelling, more open space, and greater convenience to public, metro transportation and larger local parks. 20 years later, being an empty nester, I sold that home and purchased my current dwelling in 2016, in District 2. I chose my current location because of its closer proximity to MORE PEOPLE residing in a smaller geographical footprint, seemingly built out already to its capacity; far more conducive to my lifestyle of being retired and wanting to live near others versus the far more open spaces residential area(s) of North Redondo Beach.

As you evaluate the City's revised HCD plan, as well as correspondence from others, please "consider the source" of some of that correspondence. What you might have given too much weight to in the first go-round was a handful of emails/letters from less than 5 residents promoting their own NIMBYism, a landowner with a money-driven agenda, and a special-interest group lobbying virtually EVERY City in Los Angeles County for the same thing, writing the same one-size-fits-all narrative which is disingenuous, not rooted in reality or complexities that exist within each City; not with sincere desires to truly match the HCD requirements for affordable housing in close proximity to public, metropolitan transportation hubs.

Please adopt the revised HCD plan submitted by the City of Redondo Beach. It has been carefully evaluated, reviewed to comply with your questions and clarifications, and voted on by our City Council whose majority is RESIDENT centric, aligned with what our citizens want while best matching the HCD requirements. Our Mayor, Council and City Staff have worked very hard to comply with the requirements, spending a huge amount of time and City resources to revise a Plan that can be certified. To adopt and certify this revision is to support true fairness and equity in Redondo by also discontinuing the decades-long practices of allowing the past

Council(s) agenda to overbuild, overdevelop, and over-densify the southern part of Redondo Beach, where the jobs commute is more difficult for the 93% of our residents who travel north and east, OUTSIDE the City for work.

As a last thought, Redondo Beach is one of the most densely-populated cities on the entire west coast of California, with approximately 12,000 residents per square mile. Yet our RHNA requirement for this cycle is much higher than other cities on a percentage basis, and whose density is far less. If there is any possible way for you to see your way clear to reduce the RHNA allocation for this cycle to the City of Redondo Beach, it would be most appreciated, as well as a testament to truly seeking “fairness and equitability” for all.

Thank you for your consideration,

Lezlie Campeggi  
Redondo Beach