



Nov 26, 2024

**City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277**

Re: Proposed Residential Project at 122-126 N Pacific Coast Hwy

By email: PlanningRedondo@redondo.org

**Cc: michael.webb@redondo.org; Mike.Witzansky@redondo.org;
Eleanor.Manzano@redondo.org;**

Dear Redondo Beach Planning Commission,

The California Housing Defense Fund (“CalHDF”) submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 43-unit housing development project at 122-126 N Pacific Coast Hwy, including three units for very low-income households. These laws include the Housing Accountability Act (“HAA”), the Density Bonus Law (“DBL”), and California Environmental Quality Act (“CEQA”) guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subd. (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would reduce the project’s density unless, again, such written findings are made. (*Ibid.*) As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA’s ambit, and it complies with local zoning code and the City’s general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA. (Gov. Code, § 65589.5, subd. (j)(3).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The Commission must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the Commission must not deny the project the proposed waivers and concessions with respect to the city’s art ordinance, rear setback, side setbacks, and outdoor living space, unless it makes written findings as required by Gov.

**360 Grand Ave #323, Oakland 94610
www.calhdf.org**

Code, § 65915, subd. (e)(1) that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to § 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. And recent caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

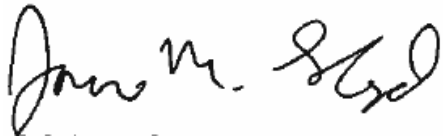
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state’s homelessness crisis; it will bring new customers to local businesses; it will grow the City’s tax base; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)3 non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dylan Casey', with a long horizontal stroke extending to the right.

Dylan Casey
CalHDF Executive Director

A handwritten signature in black ink, appearing to read 'James M. Lloyd', with a long horizontal stroke extending to the right.

James M. Lloyd
CalHDF Director of Planning and Investigations



St. James Catholic Church

Office: 124 N Pacific Coast Highway
Church: 415 Vincent Street
Redondo Beach, CA 90277
310-372-5228 Fax: 310-379-5552

Redondo Beach Planning Commission
415 Diamond St.
Redondo Beach, CA 90277

October 2, 2024

Dear Planning Commissioners,

On behalf of the St James Catholic Church community, I would like to thank you for your consideration of the City Ventures proposal to build single-family attached homes on the property located at the southeast corner of Pacific Coast Highway and Vincent Street. The sale of the property will help the St James community begin anew.

When the church located at 128 Broadway went on the market, our previous pastor took the initiative to purchase the property with the intention of building a new parish center on the same side of PCH as our church. As you might be aware, our community has already outgrown the current parish center. By consolidating our facilities in one central location, this would allow us to schedule our ministries more effectively and efficiently instead of the current method of moving larger events to the PCH/Vincent St property.

Due to our current financial situation, the new parish center can only be constructed through the proceeds from the sale of the property in question. By allowing this property to be redeveloped into much-needed for-sale housing, this would breathe new life into the area generally and potentially bring new parishioners specifically to the St. James community.

Again, thank you for allowing this discussion to take place. I am free to discuss the matter further if you prefer. I can be reached at 310-372-5228.

Sincerely,

Fr. Matt Murphy
Pastor, St James Catholic Church



Nov 26, 2024

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415 Diamond Street
Redondo Beach, CA 90277**

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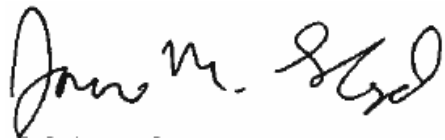
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Dylan Casey
CalHDF Executive Director

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James M. Lloyd
CalHDF Director of Planning and Investigations

January 7, 2025

**Redondo Beach Planning Commission
415 Diamond Street
Redondo Beach, CA 90277**

Subject: Support for the 122-126 Pacific Coast Highway Proposed Development

Dear Planning Commissioners,

South Bay Forward writes to express our strong support for City Ventures' proposed 43-unit for-sale housing development at 122-126 Pacific Coast Highway. This project offers an opportunity to begin to address Redondo Beach's housing needs while adhering to our legal obligations.

Complying with Housing Element and State Law:

The City's 6th Cycle Housing Element outlines our commitment to increasing housing density and accommodating new residents. The proposed development aligns perfectly with these goals, complying with designated zoning and density targets. The City's [6th Cycle Housing Element](#), Adopted July 11, 2022, promised California Housing & Community Development that housing at 28 du/ac is permitted at 126 PCH and at 17.5 du/ac at 122 PCH. Further, it notes on page 113, "By-right means that the City review must not require conditional use permit, planned unit development permit, or other discretionary review or approval." The City has no alternative but to approve this project, or else risk running afoul of [SB-167 The Housing Accountability Act](#), which requires approval of zoning and general plan compliant housing development projects such as this one, absent specific findings of health and safety hazards.

Additionally, the project is exempt from CEQA review as it is consistent with the applicable general plan and zoning designations, and does not meet any of the other requirements which would subject it to review. The City should not risk litigation due to a refusal to exempt the project from environmental review.

In short, the approval of compliant housing projects like this one is mandatory. We have a responsibility to meet our Regional Housing Needs Assessment (RHNA) to alleviate the state's housing crisis.

Benefits of the Project:

The statewide and local need for additional housing is dire and well-documented. This project will provide 43 new for-sale housing units, directly contributing to alleviating housing market pressures here in Redondo Beach, benefiting both current residents and those seeking to relocate to our city.

New residents - particularly those living within walking distance of the Pier and International Boardwalk - will strengthen the customer base for local businesses. The homeowners will additionally provide new tax revenue for the City, and resident families will bolster student enrollment in South Redondo schools. Additionally, the project's location is within walking distance of schools, businesses, and multiple transit lines, encourages sustainable transportation options, and reduces dependence on cars. Increased density promotes efficient land use and minimizes urban sprawl.

We urge the Planning Commission to approve this project in accordance with the City's Housing Element and applicable state laws. This development represents a valuable step towards a brighter future for Redondo Beach, ensuring a dynamic and thriving community with increased housing options.

Thank you for your consideration.

Sincerely,

South Bay Forward

**Redondo Beach Chamber
Board 2024-2025**

Bibi Goldstein - Chair
Buying Time LLC

Nadia Antii - Past Chair
Riviera Wealth Management

Don Ford - Chair Elect & EDC
Chair
Training Education Management

Robert Thompson - Treasurer
California Water Company

Sharon Shapiro-Fox - GRC State
& Federal Chair

Geoff Maleman - GRC Local
Issues Chair
Maleman Ink

Sophia Neveu - Health & Wellness
Chair
Torrance Memorial

Marci Klein - Member Services
Chair
Klein Creative Services

Crystal Williams - Leadership
Coordinator
The Balm Shop

DIRECTORS:

Anastasia Bonholtzer
Loan Officer Powered by AMS
Mortgage Services, Inc.

Michele Brown
Real Estate Professionals

Jac Folkert
UCLA Health

Laurie Glover
Silverado Memory Communities

Faisal Hashmi
Farmers & Merchants Bank

Mark Hansen
King Harbor Yacht Club

Tamala Lewis
Dignity Health Sports

Nasrin Moghadasian
Body Care & Spine Center

Mark Philpott
Costa Roofing

DISTRICT REPS:

Mickey Johnson – NRBBA

Mike Ward – Riviera Village
Village Runner

Michael Sharobiem – Galleria
CBRE

Chris Bredesen – Harbor
King Harbor Association

Swietlana Cahill – Tourism District
Sonesta Redondo Beach



Dear Mr. Mayor, Members of the City Council and Planning Commissioners,

On behalf of the Redondo Beach Chamber of Commerce, I am writing to express our enthusiastic support for the proposed City Ventures housing project at 122-126 North Pacific Coast Highway.

The project would add 43 3-story single-family attached homes, including three units reserved for very-low-income families.

Over the past five years, housing costs in Redondo Beach have increased by well over 25%, pricing many families out of the market and making it harder than ever for young people to afford to live in our community and for local businesses to attract and retain employees. The City Ventures project would help by adding new, for-sale housing stock to our community and enable three families who otherwise could not afford to own a home to experience the American dream of homeownership.

At a time when the housing crisis in California, and especially in the South Bay, is real, these are precisely the kinds of projects we need to support.

Moreover, City Ventures is a model developer focused on developing and building urban infill for-sale housing throughout California. Their homes are environmentally friendly with solar panels, are all-electric with pre-wired conduits for electric cars, have only electrical appliances (no gas), and are targeted towards first-time homebuyers that are considered the “missing-middle” in terms of housing and real estate.

We believe this project will be a positive addition to our community and urge the city to approve it as quickly as possible. Thank you.

Sincerely,

Dominik Knoll,
President and CEO

Redondo Beach Chamber of Commerce
514 N. Prospect Ave., Ste 301, Redondo Beach, California USA 90277
Tel 310.376.6911 • www.redondochamber.org • Fax 310.374.7373