

April 15, 2024

**VIA E-MAIL AND**  
**FIRST CLASS MAIL**

City of Redondo Beach  
Community Development Department  
415 Diamond Street  
Redondo Beach, California 90277  
Attn: Sean Scully

Email: [Sean.Scully@redondo.org](mailto:Sean.Scully@redondo.org)

Re: Comment on the City of Redondo Beach's Proposed General Plan Update

Dear Mr. Scully:

I am writing on behalf of Redondo Beach Unified School District ("RBUSD"), a public institution dedicated to serving the educational needs of the residents of the City of Redondo Beach (the "City"). RBUSD is concerned about the proposed update to the City's General Plan ("Updated GP"). Specifically, it would like to address the land use designation for properties owned by RBUSD.

**A. ALL RBUSD-OWNED PROPERTIES SHOULD BE DESIGNATED PUBLIC/INSTITUTIONAL.**

Under the current General Plan ("Current GP"), all RBUSD properties are aptly designated as Public/Institutional (P/I), recognizing their role in serving the community's educational needs. This designation encompasses lands held by public entities, special districts, and utilities, earmarking them for governmental, educational, and public cultural facilities, as well as supplementary parks and recreational spaces (Current GP, p. 2-88; Updated GP, p. 2-11).

However, in the proposed Updated GP, three RBUSD properties are inexplicably and wrongly designated as Open Space (OS), contrary to their current use and intended purpose. Specifically, the following properties, owned and operated by RBUSD, are affected:

1. Lincoln Elementary School Fields and Blacktop Area – A space for physical education and student recreation, integral to the school's program.
2. Alta Vista Elementary School Fields – An outdoor play area that supports RBUSD students' health and well-being through physical education.
3. The former Franklin School Site – Property that is currently being developed by the Friendship Foundation to provide specialized educational and developmental services, especially for students with special needs, aiming to impart crucial life skills for independence.

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Notably, Figure 3.1 in the Open Space and Conservation Element of the proposed Updated General Plan correctly identifies these three properties as public school facilities. The Land Use designation map ought to maintain consistency with Figure 3.1 by designating these sites as Public/Institutional (P/I), which would recognize them as “schools [with] ancillary parks, recreation, and open spaces.” (Updated GP, p. 2-11.)

RBUSD operates under the Education Code and California Regulations, which govern its use of properties for educational purposes. Any City land use designation that potentially impedes RBUSD’s ability to fulfill its educational mission, including the designation of its property as open space (OS), may lead to exemptions from the City’s land use regulations (see Government Code § 53094). This underscores the necessity for the appropriate designation of RBUSD properties as Public/Institutional (P/I). Such a designation is crucial to ensure alignment with their properties’ intended use and to support RBUSD’s educational mission.

RBUSD previously communicated its concerns to the City’s consultant, PlaceWorks, on or about September 29, 2023, in response to a PlaceWorks letter dated September 11, 2024. Despite this communication, the proposed land use designation map remains unchanged. The land use map must reflect the correct designation of Public/Institutional (P/I) for all RBUSD properties, aligning with their established use and supporting RBUSD’s educational objectives.

RBUSD urges the City to rectify this apparent oversight and ensure that all RBUSD properties – particularly those referenced above – are appropriately designated as Public/Institutional (P/I) in the updated General Plan. Such action will not only support RBUSD’s educational objectives but also maintain consistency with the existing land use definitions and the community’s best interests.

**B. ALL PUBLIC/INSTITUTIONAL PROPERTIES SHOULD HAVE A UNIFORM MAXIMUM FLOOR AREA RATIO SET AT 1.25.**

Additionally, a notable disparity exists in the Updated GP’s Floor Area Ratio (FAR) designation for properties designated as Public/Institutional (P/I). The proposed maximum FAR for properties within the City’s civic center and the City-owned property at the northeast corner of Pacific Coast Highway and Vincent Street is set at 1.25. In contrast, other Public/Institutional (P/I) designated properties, including school sites owned by RBUSD, are allocated a maximum FAR of only 0.75. This discrepancy not only undermines the principle of uniformity in land use planning but also places undue restrictions on RBUSD’s properties which are intended to serve the community’s educational needs.

RBUSD finds it inappropriate for the City to establish a higher FAR for its own civic center properties while imposing lower FAR requirements on other P/I-designated properties. Such inconsistency violates the uniformity requirements of the Planning & Zoning Law (see e.g., Government Code § 65852). Therefore, we urge the City to rectify this inconsistency by ensuring

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a consistent FAR of 1.25 across all P/I designated properties, including those owned by RBUSD. Further, adopting a uniform FAR will not only provide consistency but also provide needed flexibility for the development of RBUSD's educational facilities to address the City's evolving educational needs.

RBUSD plays a pivotal role in fostering a learning environment for the City's residents. Its properties and facilities are intended to meet the evolving needs of its students and the community. A uniform maximum FAR of 1.25 is critical in allowing RBUSD the flexibility to adapt or expand its services in alignment with the community's educational needs.

**C. CONCLUSION.**

In conclusion, RBUSD urges the City to revise the proposed Updated GP to accurately reflect the Public/Institutional (P/I) designation for all properties owned by RBUSD – including the three properties referenced above. This designation aligns with the properties' current use and supports the district's educational mission. Moreover, RBUSD requests the City to standardize the FAR for all Public/Institutional (P/I) designated properties to 1.25. Applying the FAR uniformly across all such public properties is not only a matter of equitable land use planning but also essential for RBUSD to meet the City's evolving educational needs.

Thank you for your attention to these important matters.

Very truly yours,

RUTAN & TUCKER, LLP



Joseph D. Larsen

JDL

cc: Nicole Wesley, Ed.D., Superintendent, RBUSD  
([nwesley@rbusd.org](mailto:nwesley@rbusd.org))  
Mike Witzansky, City Manager, City of Redondo Beach  
([Witzansky@redondo.org](mailto:Witzansky@redondo.org))  
Michael W. Webb, City Attorney, City of Redondo Beach  
([Michael.Webb@redondo.org](mailto:Michael.Webb@redondo.org))  
Annette V. Alpern, Ed.D., Deputy Superintendent, Administrative Services, RBUSD  
([aalpern@rbusd.org](mailto:aalpern@rbusd.org))

July 17, 2024

**VIA E-MAIL AND FIRST CLASS MAIL**

Planning Commission  
City of Redondo Beach  
Attn: Sean Scully  
415 Diamond Street  
Redondo Beach, California 90277

Email:  
[GeneralPlanEIR@redondo.org](mailto:GeneralPlanEIR@redondo.org)  
[Sean.Scully@redondo.org](mailto:Sean.Scully@redondo.org)

Re: Redondo Beach Unified School District Comments on Agenda Item for July 18, 2024 Meeting: Updates to General Plan Elements

Dear Planning Commission:

We are writing to provide comments on the agenda item scheduled for the upcoming meeting on July 18, 2024, titled “Public Hearing to Introduce Updates to the City’s General Plan Land Use, Open Space & Conservation, Noise, and Safety Elements Recommendation.”

I am writing on behalf of Redondo Beach Unified School District (“RBUSD”), a public institution dedicated to serving the educational needs of the residents of the City of Redondo Beach (the “City”). RBUSD is concerned about the proposed update to the City’s General Plan (“Updated GP”). Specifically, it would like to address the land use designation for properties owned by RBUSD.

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3. The former Franklin School Site – Property that is currently being developed by the Friendship Foundation to provide specialized educational and developmental services, especially for students with special needs, aiming to impart crucial life skills for independence.

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RBUSD previously communicated its concerns to the City’s consultant, PlaceWorks, on or about September 29, 2023, in response to a PlaceWorks letter dated September 11, 2024. Additionally, RBUSD sent a letter to the Community Development Department on April 15, 2024, as a comment to the proposed General Plan update. Despite these communications, the proposed land use designation map remains unchanged. The land use map must reflect the correct designation of Public/Institutional (P/I) for all RBUSD properties, aligning with their established use and supporting RBUSD’s educational objectives. For your reference, copies of the previous correspondence are enclosed and incorporated herein.

RBUSD urges the City to rectify this apparent oversight and ensure that all RBUSD properties – particularly those referenced above – are appropriately designated as Public/Institutional (P/I) in the updated General Plan. Such action will not only support RBUSD’s educational objectives but also maintain consistency with the existing land use definitions and the community’s best interests.

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Very truly yours,

RUTAN & TUCKER, LLP



Joseph D. Larsen

JDL

Enclosures

cc: Nicole Wesley, Ed.D., Superintendent, RBUSD ([nwesley@rbusd.org](mailto:nwesley@rbusd.org))  
Mike Witzansky, City Manager, City of Redondo Beach ([Mike.Witzansky@redondo.org](mailto:Mike.Witzansky@redondo.org))  
Michael W. Webb, City Attorney, City of Redondo Beach ([Michael.Webb@redondo.org](mailto:Michael.Webb@redondo.org))  
Annette V. Alpern, Ed.D., Deputy Superintendent Admin Srv, RBUSD ([aalpern@rbusd.org](mailto:aalpern@rbusd.org))



September 11, 2023

Fred Naile  
Director of Facilities, Maintenance and Operations  
Redondo Beach Unified School District  
1401 Inglewood Ave.  
Redondo Beach, CA 90278

Subject: Request for Service Provider Information for the Draft Environmental Impact Report for Redondo Beach General Plan Update, Zoning Code Update and Local Coastal Program

Dear Mr. Fred Naile:

On behalf of the City of Redondo Beach (City), PlaceWorks is preparing a Draft Environmental Impact Report (Draft EIR) for the Redondo Beach General Plan, Zoning Code Update and Local Coastal Program (proposed project). This letter is to request your assistance in updating information regarding existing school-related services in Redondo Beach and assessing potential impacts of the proposed project. Please respond to the enclosed questionnaire, using additional sheets if necessary. Note that your responses will become a part of the administrative record for this project and will be included as an appendix to the Draft EIR.

### **Project Location**

Redondo Beach is in the South Bay region of Los Angeles County. It is bordered to the north by Hermosa Beach, Manhattan Beach, Hawthorne, and El Segundo; to the east by Torrance and Lawndale; to the south by the Palos Verde Peninsula; and to the west by the Pacific Ocean. For purposes of the General Plan Update, the project planning area includes the entire geographic area of the City, which has a total land area of approximately 3,970 acres (6.2 square miles). As depicted in Figure 1, *Project Area*, the City is developed with a variety of land uses, such as established residential neighborhoods, commercial corridors, industrial complexes, public facilities, and parks.

### **Project Description**

#### ***Redondo Beach General Plan Update, Zoning Code Update and Local Coastal Program***

A General Plan establishes long-term goals and policies to guide a community in realizing a vision into the future. The State of California requires each city to adopt a comprehensive, long-term general plan for the physical development of a community and provides a list of topics that must be addressed. Local decision makers use the goals and policies of a general plan to make decisions regarding land use, housing, mobility, infrastructure, open spaces, and recreation.

The City has selected the year 2050 as its planning horizon for updating the existing General Plan. The City is updating four of the State-required elements that make up the General Plan: the Land Use, Open Space and Conservation, Safety, and Noise elements. Updates to these elements will be accompanied by associated revisions to the City's Zoning Code and Local Coastal Program needed to make consistent and implement the updated goals and policies. In addition, updates to the General Plan Land Use designations will be reviewed pursuant to the City Chart, Article XXVII, Area of Major Changes in Allowable Land Use. The General Plan is the principal policy document for guiding community growth and the provision of public services and is defined by specific community priorities and values that were identified during the public outreach process. Once adopted, the General Plan provides high-level guidance that sets the goals and priorities for related efforts, including the zoning code, specific plans, subdivision ordinances, and other planning projects.

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The following elements will be updated as part of the Redondo Beach General Plan, Zoning Update and Local Coastal Program Amendment:

- » The **Land Use Element** establishes how land is developed, used, and arranged to ensure compatibility and add value to the community in terms of function, design, and fiscal return.
- » The **Open Space Element** coordinates the circulation system with future land use patterns and buildout to satisfy local and subregional mobility needs, as well as access and connectivity between various neighborhoods and districts. This element also defines goals and policies for the provision of public infrastructure to support the uses accommodated by the Land Use Element.
- » The **Conservation Element** addresses how resources are managed comprehensively using systems that are environmentally and economically sustainable and meet growth demand in Redondo Beach.
- » The **Safety Element** addresses how the City protects life, property, and commerce from impacts associated with human-made and natural hazards, disasters, and other threats to public safety. It also identifies ways the City can establish strategies to adapt to increased hazard risks and strategies to become more resilient.
- » The **Noise Element** provides a basis for comprehensive local programs to control and abate environmental noise and to protect residents from excessive exposure.

The General Plan will also include an Implementation Plan that identifies responsible parties and the actions needed to carry out General Plan policies.

Table 1, *Buildout Statistical Summary*, provides a statistical summary of the buildout potential associated with the updated Land Use Plan compared to existing conditions. Figure 3, *Current Land Use Plan*, shows the existing land use plan for the city. Figure 4, *Proposed Land Use Plan*, shows the proposed General Plan Land Use Map.

**Table 1 Buildout Statistical Summary**

Scenario	Acres	Number of Housing Units	Total Population	Nonresidential Square Feet	Employment (Number of Jobs)
Existing Conditions	3,973	30,431 <sup>1</sup>	70,311 <sup>2</sup>	11,826,277 <sup>3</sup>	28,638
Proposed General Plan (2050)	3,973	35,387 <sup>1</sup>	78,978 <sup>2</sup>	17,508,276 <sup>3</sup>	36,627
Potential Growth	--	4,956	8,667	5,681,999	7,989

Notes:

1. Includes accessory dwelling units (ADUs) and assisted living units.
2. Includes people living in dwelling units, ADUs, assisted living units, and group quarters.
3. Includes square-footage of commercial uses with group quarters (such as memory care facilities).

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*Public Agency Approvals*

The proposed project will require adoption by the Redondo Beach City Council. The Planning Commission, General Plan Advisory Committee, and other decision-making and advisory bodies will review the proposed project and make recommendations to City Council. Though other agencies may be consulted during the project process, their approval is not required for adoption of the Redondo Beach General Plan, Zoning Code Update and Local Coastal Program Amendment. However, subsequent development under the proposed project may require approval of state or federal responsible or trustee agencies that may rely on the EIR for decisions in their areas of expertise.

Please respond to PlaceWorks no later than **Wednesday, October 11, 2023**. If you need additional time to respond, please let me know as soon as possible. You can email your responses to me at [ehaines@placeworks.com](mailto:ehaines@placeworks.com). If you prefer, mail the completed questionnaire to my attention at 700 S. Flower St., Suite 600, Los Angeles, California, 90017. Feel free to contact me at 213.623.1443 ext. 2132 or via the aforementioned email. Thank you for your prompt attention to this request.

Sincerely,

**PLACEWORKS**

A handwritten signature in black ink that reads "Emma Haines".

Emma Haines  
Associate

Enclosures:

- Questionnaire
- Figure 1: Project Area
- Figure 2: Existing Land Uses
- Figure 3: Current Land Use Plan Map
- Figure 4: Proposed Land Use Plan Map

Redondo Beach General Plan Update, Zoning Code Update and Local Coastal Program  
Amendment  
Redondo Beach Unified School District

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1. Please provide RBUSD current student generation rates and development impact fees? If possible, please provide the Developer Fee Justification Study for RBUSD?

RBUSD Developer Fee Justification Study 2020  
attached under separate cover.

2. Are there any existing plans to expand school facilities with RBUSD? If so, please describe these planned expansions.

RBUSD may increase classrooms at a few of the elementary school sites in the next 1-5 years in order to accommodate students in a full day kindergarten program (currently 1/2 day kindergarten shares classrooms with a.m. & p.m. programs) as well as implement CA's new Universal TK program.

3. Is there any existing Safe Routes to School program in place? If yes, please indicate how or where we can obtain a copy.

NO.

Redondo Beach General Plan Update, Zoning Code Update and Local Coastal Program  
Amendment  
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4. Please provide any additional comments you wish to make regarding the proposed project.

\*

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I marked up the document attached. The City's Proposed Land Use Plan takes property owned by the school district (should be shaded light blue for Public/Institutional) and marks it up on the map as green for parks/open space. While these areas are currently in use as parks/open space, the School district has the authority to use or convert district property for any educational use it may deem appropriate.

Response Prepared By:

Annette V. Alpern Deputy Superintendent  
Name Title

Redondo Beach Unified School District 09/29/23  
Agency Date

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**Figure 1 - Project Area Map**



— City of Redondo Beach  
 Note: The City boundary extends 3 miles into the Pacific Ocean, which is not shown on this exhibit.  
 Source: City of Redondo Beach, 2023.

0 4,000  
 Scale (Miles)

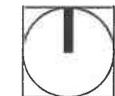


PlaceWorks

Figure 2 - Existing Land Uses



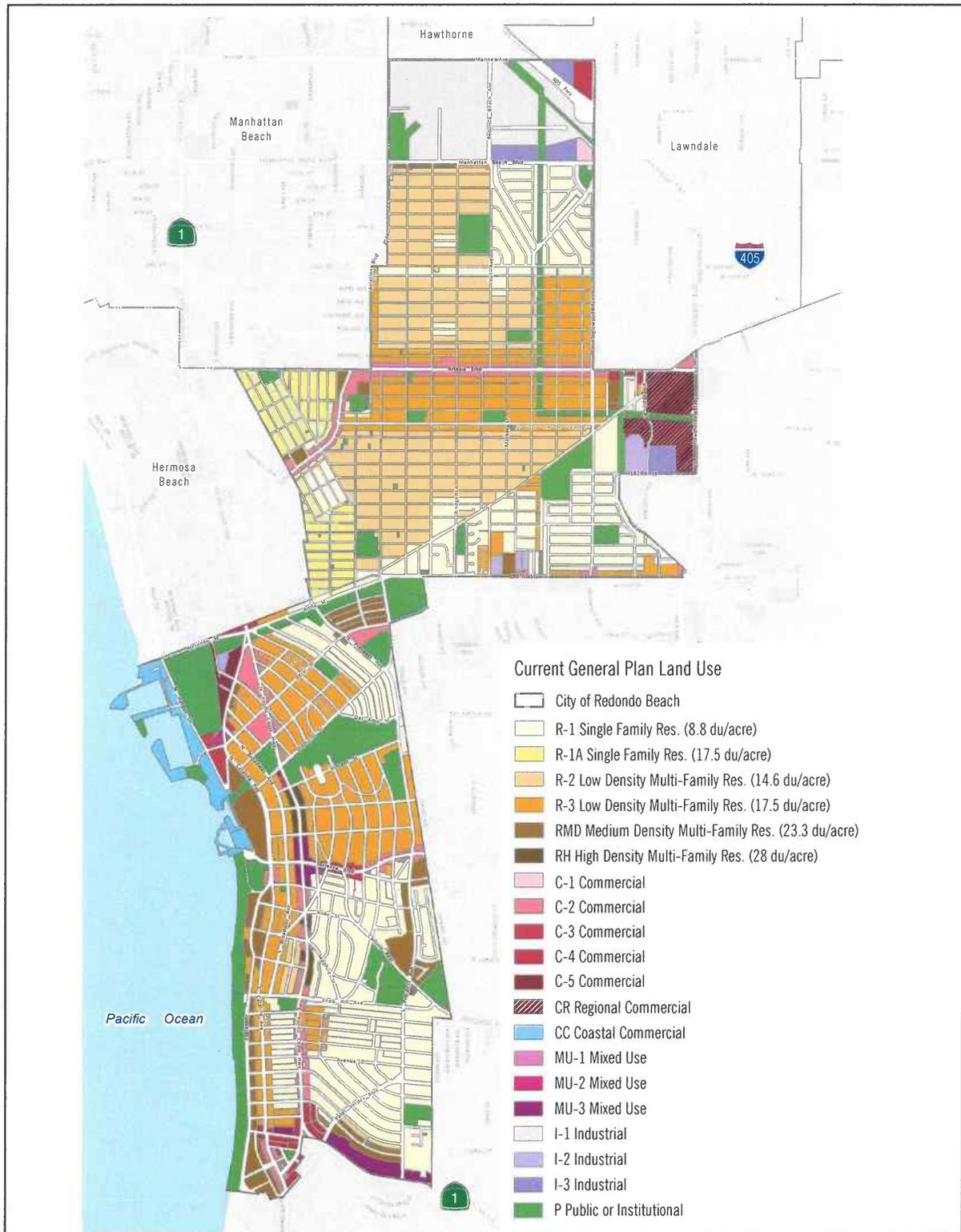
Source: City of Redondo Beach and PlaceWorks, 2023.



PlaceWorks

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Figure 3 - Current Land Use Plan



0 3,750  
Scale (Feet)



Source: City of Redondo Beach, 2023.

PlaceWorks

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Figure 4 - Proposed Land Use Plan



This area is R.BUSD property and should be shaded blue

This area is R.BUSD + should be shaded light blue

Source: City of Redondo Beach and PlaceWorks, 2023.