

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
301 E Ocean Blvd, Suite 300  
Long Beach, CA 90802  
(562) 590-5071



May 2, 2022

SENT VIA EMAIL

Brandy Forbes, Community Development Director  
Department of Community Development  
415 Diamond Street  
Redondo Beach, CA 90277

Re: Redondo Beach Local Coastal Program Amendment No. LCP-5-RDB-21-0017-1

Dear Ms. Forbes:

You are hereby notified that the California Coastal Commission, at its April 6, 2022 meeting, approved with modifications Local Coastal Program (LCP) Major Amendment LCP-5-RDB-21-0017-1 that amends the Implementing Ordinances of the certified LCP to incorporate regulations for accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) consistent with recent changes in state law. The amendment would replace provisions for second units in single-family and multi-family residential zones with definitions for ADUs and JADUs and clarify development standards for accessory units including size, height, and setback limits.

The Commission approved the LCP amendment with suggested modifications. The suggested modifications are attached. Therefore, LCP Amendment No. LCP-5-RDB-21-0017 will not be effective for implementation in the City's coastal zone until: 1) the Redondo Beach City Council adopts the Commission's suggested modifications, 2) the City Council forwards the adopted suggested modifications to the Commission by resolution, 3) the Executive Director certifies that the City has complied with the Commission's April 6, 2022 action, and 4) the Commission concurs with the Executive Director's determination that the action by the City Council adopting the suggested modifications is legally adequate. The Coastal Act requires that the City's adoption of the suggested modifications be completed within six months of the Commission's April 6, 2022 action. Therefore, the deadline for City Council adoption in this case is **October 6, 2022**. If six months is not adequate, the City may request additional time to obtain local approval of the suggested modifications. Such requests must be approved by the Commission at a hearing. If you wish to have additional time, please contact Commission staff regarding the appropriate procedure.

Thank you for your cooperation and we look forward to working with you and your staff in the future. If you have any questions, please contact Mandy Revell at [mandy.revell@coastal.ca.gov](mailto:mandy.revell@coastal.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Mandy Revell".

Mandy Revell  
Coastal Program Analyst

## ***SUGGESTED MODIFICATIONS FOR LCP-5-RDB-21-0017-1***

For the following suggested modifications:

Existing certified language is shown in plain text.

The City's proposed additions are shown in underline text.

The City's proposed deletions are shown in ~~strike-out text~~.

The Commission's suggested additions are shown in double underline text.

The Commission's suggested deletions are shown in ~~double strike-out text~~.

The following suggested modifications, prepared in collaboration with City of Redondo Beach staff, are necessary to carry out the provisions of the certified LUP:

**Suggested Modification 1.** Allow JADUs in multi-family residences as well as single-family residences.

Section 10-5.402(a) DEFINITIONS as follows:

(104.5) "Junior accessory dwelling unit" shall mean a unit that is no more than 500 square feet in size and is contained entirely within a single -family or multi-family residence. A junior accessory dwelling unit may include separate sanitation facilities or may share sanitation facilities with the existing structure.

**Suggested Modification 2.** Permit ADUs in proposed multi-family dwellings.

Section 10-5.1506 Accessory dwelling units in single-family and multi-family residential zones:

Accessory dwelling units and junior accessory dwelling units shall be permitted uses in areas zoned to allow single-family or multifamily dwelling residential use on lots that contain a proposed or existing single-family dwelling or ~~on a proposed or existing multifamily dwelling~~, provided that the unit complies with this Section.

**Suggested Modification 3.** Clarify that the owner must live primarily in one of the units.

Section 10-5.1506 Accessory dwelling units in single-family and multi-family residential unit (a) Review and Approval.

(10) Owner Occupancy. Any declaration of restrictions regarding owner occupancy previously recorded in conjunction with development of an accessory dwelling unit remains valid and binding on any successor in ownership of the property unless the accessory dwelling unit is removed. For any accessory dwelling unit permitted after January 1, 2025, for single-family residential zones, the primary unit or the accessory dwelling unit shall

be occupied by the owner of the property. Prior to the issuance of a building permit for the accessory dwelling unit, a covenant shall be recorded that specifies that the owner must live primarily in one of the units. ~~no more than one of the units may be rented.~~

**Suggested Modification 4.** Require that new ADUs and JADUs must comply with setbacks established in the LCP where required to protect the coastal resource protection policies of the LCP.

Section 10-5.1506 Accessory dwelling units in single-family and multi-family residential unit (b) Standards for streamlined accessory dwelling units.

(1) Standards applicable to all streamlined accessory dwelling units and junior accessory dwelling units.

a. The accessory dwelling unit or junior accessory dwelling unit complies with applicable building codes and health and safety regulations; however, the accessory dwelling unit or junior accessory dwelling unit is not required to provide fire sprinklers unless fire sprinklers are required for the primary dwelling. All structures, however, including accessory dwelling units and junior accessory dwelling units, shall comply with building codes, including, but not limited to, fire rating requirements and setbacks established in the LCP where required to comply with the coastal resource protection policies of the LCP.

**Suggested Modification 5.** Clarify that the primary dwelling and ADU or JADU cannot be conveyed separately unless the requirements for separate conveyance pursuant to Government Code (658552.26) are met.

Section 10-5.1506 Accessory dwelling units in single-family and multi-family residential unit (b) Standards for streamlined accessory dwelling units.

(1) Standards applicable to all streamlined accessory dwelling units and junior accessory dwelling units.

b. The accessory dwelling unit or junior accessory dwelling unit may be rented in full or in part for the purpose of overnight lodging for terms of thirty (30) or more consecutive days, but it shall not be rented for overnight lodging or subleased for shorter terms. Neither the primary dwelling nor the accessory dwelling unit or junior accessory dwelling unit shall be sold or otherwise conveyed separately from the other unit unless the sale or conveyance of the ADU meets

the requirements set forth in Government Code Section 65852.26

**Suggested Modification 6.** Require one off-street parking space per ADU to protect public on-street parking for coastal access in the mapped prime visitor area shown in Figure 1 (Exhibit 3), and for all other areas implement the state exceptions for parking requirements for ADUs. Also, remove the proposed one new parking space requirement for JADUs within the entire coastal zone to encourage JADU construction consistent with state laws.

Section 10-5.1506 Accessory dwelling units in single-family and multi-family residential unit (b) Standards for streamlined accessory dwelling units.

(1) Standards applicable to all streamlined accessory dwelling units and junior accessory dwelling units.

d. The applicant shall provide one off-street parking space per accessory dwelling unit ~~or junior accessory dwelling unit~~ that complies with the requirements of Section 10-5.1704 on the same lot as the accessory dwelling unit ~~or junior accessory dwelling unit~~ and dedicated for non-exclusive use by the occupant(s) of the accessory dwelling unit on lots located along and west of Catalina Avenue, including lots fronting the inland side of Catalina Avenue from Knob Hill Avenue to Paseo de la Playa, as shown in the Accessory Dwelling Unit Parking Overlay as depicted in Figure 1. For all other areas, the applicant shall provide one parking space, except if one of the following parking exemptions applies, in which case no parking is required:

1. The ADU would be located within the existing primary dwelling or all or part of an existing accessory structure.
2. The ADU would be located within a half mile of public transit.
3. The ADU would be located in an architecturally or historically significant district.
4. The ADU would be located on a property within one block of a designated car share parking location.

Notwithstanding any other provisions of this Code, the required parking space may be located as a tandem space in an existing driveway or in the required setbacks, and may have a permeable, all-weather surface, unless specific findings are made that parking in setback areas or tandem parking is not feasible based on specific site or regional topographical or fire and life safety conditions. The parking space for the primary dwelling and the accessory dwelling unit ~~or junior accessory dwelling unit~~ may be

located in any configuration on the same lot as the accessory dwelling unit or junior accessory dwelling unit, including, but not limited to, enclosed spaces, unenclosed spaces, or tandem spaces, or by the use of mechanical automobile parking lifts; provided that the spaces and driveway comply with the requirements of Section 10-5.1704.

**Suggested Modification 7.** A new Figure 1 shall be added into the certified Implementation Plan component of the Local Coastal Program. Figure 1 shall depict the boundaries of the Overlay Zone where off-street parking will be required for new ADUs and for replacement parking for garage conversions as depicted in Exhibit 3 to this staff report and shall include lots located along and west of Catalina Avenue, including lots fronting the inland side of Catalina Avenue from Knob Hill Avenue to Paseo de la Playa.

**Suggested Modification 8.** Clarify that the owner must live primarily in one of the units, and change “livable” to “habitable” to be consistent with the ordinance in its entirety.

Section 10-5.1506 Accessory dwelling units in single-family and multi-family residential unit (b) Standards for streamlined accessory dwelling units.

(1) Standards applicable to all streamlined accessory dwelling units and junior accessory dwelling units.

(h) (2). This includes the requirement that either the primary unit or the junior accessory dwelling unit shall be occupied by the owner of the property. Prior to the issuance of a building permit for the junior accessory dwelling unit, a covenant shall be recorded that specifies that no more than one of the units may be rented. The owner ~~may reside in either the remaining portion of the structure or the newly created junior accessory dwelling unit~~ must live primarily in one of the units. Owner occupancy shall not be required if the owner is another governmental agency, land trust, or housing organization.

4. c. The accessory dwelling unit is located within a portion of the existing two-family or multifamily dwelling structure that is not used as ~~habitable~~ livable space.

**Suggested Modification 9.** Require one off-street parking space per ADU to protect public on-street parking for coastal access in the mapped prime visitor area shown in Figure 1 (Exhibit 3), and for all other areas implement the state exceptions for parking requirements for ADUs. Also require replacement off-street parking when a private garage, carport, or covered parking space is converted to an ADU, unless existing uncovered offstreet parking exists that provides the minimum number of required offstreet parking spaces for the primary structure(s).

Section 10-5.1506 (c) Standards for the other accessory dwelling units

(8) Parking.

a. The applicant shall provide one off-street parking space for each accessory dwelling unit that complies with the requirements of Section 10-5.1704 on the same lot as the accessory dwelling unit and dedicated for non-exclusive use by the occupant(s) of the accessory dwelling unit on lots located along and west of Catalina Avenue, including lots fronting the inland side of Catalina Avenue from Knob Hill Avenue to Paseo de la Playa, as shown in the Accessory Dwelling Unit Parking Overlay depicted in Figure 1. For all other areas, the applicant shall provide one parking space, except if one of the following parking exemptions applies, in which case no parking is required:

1. The ADU would be located within the existing primary dwelling or all or part of an existing accessory structure.
2. The ADU would be located within a half mile of public transit.
3. The ADU would be located in an architecturally or historically significant district.
4. The ADU would be located on a property within one block of a designated car share parking location.

When a private garage, carport, or covered parking structure is demolished or converted in conjunction with the construction of an accessory dwelling unit or converted to an accessory dwelling unit, replacement off street parking spaces is required unless existing uncovered off-street parking exists that provides the minimum number of required off-street parking spaces for the primary structure(s).

**Suggested Modification 10.** Clarify that JADUs contained entirely within existing living area of an existing single-family dwelling that will not involve removal or replacement of major structural components are exempt from coastal development permit requirements as improvements to existing single-family residences.

Section 10-5.2208 Exemptions and Categorical Exclusions. (a) Exemptions.

(1) Improvements to existing single-family residences. Improvements to existing single-family residences (including: (a) all fixtures and other exterior structures directly attached to the residence; (b) ancillary structures normally associated with a single-family residence such as garages, swimming pools, fences, storage sheds; (c) landscaping; and (d) accessory dwelling units, including JADUs, contained entirely within existing living area of the existing single-family dwelling unit that will not

involve removal or replacement of major structural components (e.g. roofs, exterior walls, or foundations)) shall be exempt from the requirement for a Coastal Development Permit with the exception of the following:

- a. Improvements resulting in additional dwelling unit(s) on the property, whether detached or attached, except for accessory dwelling units as referenced in (d) above.