

From: Miller, Reid@HCD
To: [Brandy Forbes](#); [Lina Portolese](#)
Cc: [Antonio Gardea](#); [Sean Scully](#)
Subject: Re: ADU Ordinance (Draft) Comments- Redondo Beach
Date: Monday, October 12, 2020 11:59:00 AM
Attachments: [image001.png](#)



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Hi Brandy,

I do not intend on providing any more comments, unless you all would like to submit an updated draft at any point. Of course, feel free to email me any time if you have additional questions.

Best,

Reid

From: Brandy Forbes <Brandy.Forbes@redondo.org>
Sent: Monday, October 12, 2020 11:07 AM
To: Miller, Reid@HCD <Reid.Miller@hcd.ca.gov>; Lina Portolese <Lina.Portolese@redondo.org>
Cc: Antonio Gardea <Antonio.Gardea@redondo.org>; Sean Scully <Sean.Scully@redondo.org>
Subject: RE: ADU Ordinance (Draft) Comments- Redondo Beach

Reid,

Thank you for providing your feedback. You note that these are some of the comments. Do you expect to provide more? We don't want to update our ordinance with these and then have to update again with anything additional. Any guidance would be greatly appreciated.

Thanks,

Brandy Forbes

Community Development Director

Department of Community Development

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From: Miller, Reid@HCD <Reid.Miller@hcd.ca.gov>
Sent: Monday, October 12, 2020 10:52 AM
To: Lina Portolese <Lina.Portolese@redondo.org>
Cc: Brandy Forbes <Brandy.Forbes@redondo.org>; Antonio Gardea <Antonio.Gardea@redondo.org>; Sean Scully <Sean.Scully@redondo.org>
Subject: ADU Ordinance (Draft) Comments- Redondo Beach



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Good Morning Lina,

Apologies again for the delay, I had a couple of other draft ADU ordinances come in the last few days that required expedited reviews. Below are some of the comments I had in reading through your draft ordinances:

Comments on Non-Coastal Zone Ordinance:

- On pg. 3, an ADU or JADU must still be allowed on a lot with a proposed or existing multifamily structure as per CA Government Code 65852.2(a)(1)(D)(ii). It is only under 65852.2(e)(1)(C)-(D) that development is limited to lots with existing multifamily structures (in which case 2 detached ADUs would be allowed instead of just one).
- On pg. 4 under (a)(3)(a), taking action is generally limited to approval or denial within 60 days
- On pg. 4/5, even if the ADU is reviewed at the same time as the single family dwelling, the ADU streamlining procedures must still be applied. The applicant cannot be forced to wait for the review of the ADU application until after the single family application is approved
- In (6) on pg. 5, existing ADUs can be expanded to 850 square feet for a one-bedroom or 1,000 square feet for more than one bedroom under CA Government Code 65852.2(a)-(d), and up to 800 square feet under (e)
- On pg. 6, as long as subleases are for a period of longer than 30 days, I do not see a reason or justification for them to be limited
- On pg. 7-8, an ADU or JADU must be allowed on all lots with a proposed or existing primary residence. This cannot be limited by the fact that there is already an existing "guest dwelling", unless the guest dwelling also meets the definition of an ADU
- In (e) on pg. 9, just want to be clear that a lot with an existing multifamily structure is entitled to two detached ADUs under CA Government Code 65852.2(e)
- In (e)(3) on pg. 10, requiring an entryway to be at least 10 ft from the property line cannot be a requirement if it prevents the development of an ADU. State law is very clear that required setbacks can be no greater than 4 feet in the rear and side yard.

Comments on Coastal Zone Ordinance:

- On pg. 6-8, I am a bit confused as to what constitutes a "second unit." If second unit is synonymous with "accessory dwelling unit," there are numerous requirements in this section that would not comply with State ADU law
- On pg. 9, same comment as in the on-coastal ordinance regarding ADUs on lots with proposed or existing multifamily structures. An ADU or JADU must still be allowed on a lot with a proposed or existing multifamily structure as per CA Government Code 65852.2(a)(1)(D)(ii). It is only under 65852.2(e)(1)(C)-(D) that development is limited to lots with existing multifamily structures (in which case 2 detached ADUs would be allowed instead of just one).
- On pg. 12, under (e), it cannot be a requirement that the exit of an ADU or JADU not face the front property line. It can be a preference, but it cannot prevent the approval of an application to build an ADU/JADU
- On pg. 14, (c)(2) should be removed. ADUs must be allowed wherever residential development is allowed, including on lots containing multifamily structures.
- On pg. 14, (c)(3) should be amended to allow JADUs and ADUs on the same lot. An ADU may be built on the same lot as a JADU, provided it is detached and of new construction
- On Pg. 15, (e)(3), same comment as in the non-coastal zone, requiring an entryway to be at least 10 ft from the property line cannot be a requirement if it prevents the development of an ADU. State law is very clear that required setbacks can be no greater than 4 feet in the rear and side yard. (e)(4)-(5) are also potential constraints on ADU development. These may be preferences, but they cannot be requirements that would prevent the approval of an ADU application if they are not met.

If you have any additional questions, or would like to send over another draft at any point, just let me know and I will be happy to assist in any way I can.

Best,

Reid

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