## **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.

## PLANNING COMMISSION MEETING September 15, 2022

J.1. A PUBLIC HEARING FOR CONSIDERATION OF AN ENVIRONMENTAL ASSESSMENT (ENVIRONMENTAL IMPACT REPORT - STATEMENT OF OVERRIDING CONSIDERATIONS AND MITIGATION MONITORING AND REPORTING PROGRAM), VARIANCE, COASTAL DEVELOPMENT PERMIT, CONDITIONAL USE PERMIT (DENSITY BONUS), PLANNING COMMISSION DESIGN REVIEW, AND VESTING TENTATIVE MAP NO. 82561 TO PERMIT CONSTRUCTION OF A PROPOSED 30-UNIT RESIDENTIAL PROJECT WITH ADAPTIVE REUSE OF EXISTING NON-RESIDENTIAL BUILDINGS FOR COMMERCIAL PURPOSES ON PROPERTY LOCATED WITHIN A LOW DENSITY, MULTIPLE-FAMILY RESIDENTIAL (R-3A) ZONE, IN THE COASTAL ZONE, AT 100-132 N. CATALINA AVENUE. (CASE NOS. IES-EIR-2021-01; CUP-2022-01; VAR-2022-02; CDP-2022-03; PCDR-2022-01; VTPM 82561)

CONTACT: ANTONIO GARDEA, SENIOR PLANNER

• Public written comments received after release of the agenda

## September 9, 2022

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

## Re: Proposed Housing at 100-132 N. Catalina Avenue.

Dear Planning Commission and City Attorney:

The California Renters Legal Advocacy and Education Fund (CaRLA) submits this letter to inform the Redondo Beach Planning Commission that they have an obligation to abide by all relevant state housing laws when evaluating the proposed 100-132 North Catalina Avenue mixed-use housing development. The Housing Accountability Act (GOV 65589.5) requires approval of zoning and general plan compliant projects unless findings can be made regarding specific, objective, written health and safety hazards.

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; it will bring increased tax revenue, new customers to local businesses, decarbonization in the face of climate crisis, but most importantly it will reduce displacement of existing residents into homelessness or carbon-heavy car commutes.

CaRLA 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. Consistent with the general plan, the proposed development will provide badly needed housing and accommodate residents' commercial and employment needs while maintaining and enhancing the quality and character of the City. In addition, the proposed development provides amenities that make walking safe and enjoyable and promotes the use of alternative transportation to reduce vehicle miles traveled.

While no one project will solve the regional housing crisis, the proposed 100-132 North Catalina Avenue development is the kind of housing Redondo Beach needs to mitigate displacement, provide shelter for its growing population, and arrest unsustainable housing price appreciation. You may learn more about CaRLA at <u>www.carlaef.org</u>.

Sincerely,

Dylan Casey

CaRLA Executive Director

Sincerely,

Courtney Welch CaRLA Director of Planning and Investigation

CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.

Hello Planning Commission,

I am the owner of 129 N Broadway #D, directly behind the project.

I am opposed to so many aspects of this obnoxious project, and to the developers pushing and pushing, trying to wear down the neighbors, in order to get their way. It is clearly greed and not what's best for the community that motivates them.

The most concerning of many issues are:

15 or so 5-bedroom units will mostly appeal to roommates, which means 5 cars per unit, and a high likelihood of excessive noise.

Over 200 residents total with only 66 parking spaces will be a huge burden on the neighborhood.

This project is basically a youth hostel.

Sincerely,

Karen Kaminskas

From:	Brandy Forbes		
To:	Lina Carrillo		
Subject:	FW: Comments to Planning Commission, September 2022 (final)		
Date:	Thursday, September 15, 2022 11:24:47 AM		
Attachments:	image001.png		

Lina,

Can you please add this as a Blue Folder item for tonight?

Thanks,

#### **Brandy Forbes**

#### **Community Development Director**

Department of Community Development 415 Diamond Street Redondo Beach, CA 90277 (310) 318-0637 x2200 brandy.forbes@redondo.org www.redondo.org



From: Holly Osborne
Sent: Thursday, September 15, 2022 10:11 AM
To: CityClerk <CityClerk@redondo.org>
Cc: Brandy Forbes <Brandy.Forbes@redondo.org>
Subject: Comments to Planning Commission, September 2022 (final)

#### CAUTION: Email is from an external source; Stop, Look, and Think before opening attachments or links.

Dear Planning Commission and Planning Department:

Here are my observations on the Catalina Project. Please put this in the receive and file/blue folder items for tonight's Planning Commission Meeting. I have made liberal use of screen captures, so that I will not introduce typographical errors.

#### Holly Osborne.

#### Background:

1. Project description

The Project proposes a mixed-use development featuring the following residential and commercial uses:

- 30 multi-family residential units including:
  - o 8 2-bedroom units
  - 4 4-bedroom units
  - o 18 5-bedroom units
- 2. Project detailed summary

#### UNIT SUMMARY

				TOTAL		
UNIT TYPE	DESCRIPTION	UNITS	GROSS SF	GROSS SF	NET AREA	TOTAL NET
A-1	5BDRM, 4.5BATH	6	1,695	10,170	1,596	9,576
A-2	5BDRM, 4.5BATH	1	1,695	1,695	1,596	1,596
B-1	5BDRM, 4.5BATH	5	1,657	8,285	1,558	7,790
B-2	5BDRM, 4.5BATH	1	1,657	1,657	1,558	1,558
B-3	5BDRM, 4.5BATH	3	1,676	5,028	1,577	4,731
D**	2BDRM, 2.5BATH	4	1,022	4,088	943	3,772
E**	5BDRM, 3.5BATH	2	1,624	3,248	1,525	3,050
H**	2BDRM, 2BATH	1	901	901	836	836
1	2BDRM, 2BATH	1	1,069	1,069	986	986
J	4BDRM, 2BATH	1	1,479	1,479	1,400	1,400
К	4BDRM, 2BATH	1	1,318	1,318	1,234	1,234
L	4BDRM, 2.5BATH	2	1,302	2,604	1,220	2,440
M**	2BDRM, 1BATH	1	794	794	739	739
N	2BDRM, 1BATH	1	892	892	831	831
		30		43,228		40,539

1,887 B F. ROOF DECK AND COMMUNITY ROOM PROVIDE THE REQUIRED OPEN SPACE FOR UNITS H, T, J, K, L, M, AND N AFFORDABLE UNITS - TOTAL FOUR AFFORDABLE UNITS (ONE 'E', ONE 'D', ONE 'H, ONE 'M)

2a. Examination of the A units, of 5 BDRM and 4.5 bath:



#### Comments:

1) The Plan says this is for 5 Bedrooms and 4.5 baths. A careful searching of all floors did not reveal a half bathroom anywhere. (Is there an outhouse in the setbacks?)

m°

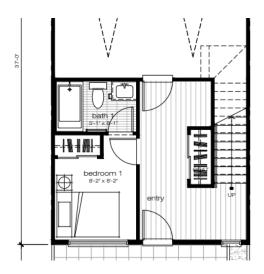
2) The garage width is 19' 11". repeated searches of the internet have shown comments like the following:

If you make a garage too small — even by a foot — it becomes almost impossible to get two cars into the space or open the car doors once inside.

The minimum size of a functional two-car garage is 20 feet long by 20 feet wide.

It's already difficult to do either of those things in a 20' by 20' garage. Small vehicles like compact cars and sedans are the best fit for a garage in this category.

This garage is probably barely adequate. But what are you going to do if there are two large cars that need to be parked? 3. Examine the bedroom on the first floor more closely: It is 8-2" by 8-2", or is 66.69 sq ft.



I had a tough time deciding whether this even was large as a prison cell. Well, it does meet the old prison cell standard (48 sq ft), but not the new standard (ACA) of 70 sq ft. See the copy from the internet, below.

In the United States old prison cells are usually about 6 by 8 feet (1.8 by 2.4 m) in dimension which is **48 sq ft (4.5 m<sup>2</sup>)**, (moreover, however, American Correctional Association standards call for a minimum of 70 sq ft ( $6.5 \text{ m}^2$ ), with steel or brick walls and one solid or barred door that locks from the outside.

I did some research, and found the pallet shelters are 64 sq ft. So, this basement bedroom is the size of a pallet shelter. However, when I did some search on the internet on the minimum to size 1 bedroom, I found the following two quotes:

3a. According to Learn Framing experts, the International Residential Code book specifies that **the minimum size for a bedroom is 70 square feet**. In other words, the room has to be at least 7 feet by 10 feet or an equivalent, such as 8 feet by 9 feet.

3b. Also, an internet search answering the question What is considered a small bedroom yielded the following:

What is considered a small bedroom?

What is the size of a small bedroom? A small bedroom can also be considered the "minimum size bedroom." Legally, in order to be called a bedroom, a room must measure **7' x 10'**. Anything smaller and sellers cannot call it a bedroom. Feb 21, 2020

So, it is dubious whether the garage-level "bedroom" really meets legal bedroom standards.

4. Second level. All bedrooms. No comments here.

5. Third Level, one bedroom, and kitchen, living room, etc.

Who designed the bedroom/bathroom layout on the 3rd floor, which also has the kitchen/dining room/living area? In order to GET to the bathroom on that level, **one has to** enter the bedroom, walk through the bedroom, and then enter the bathroom. That is an awful layout even for families; if you are renting this out room by room, no one will take that arrangement unless you are GIVING that room away!

Note: This same ill-thought out plan with the bedroom on the top level also appears on the B1 and B2 type units.

6. Final thought on plan A. Make the units a little wider to get the garages "solid" Get rid of the roof deck.

#### Comments on Plan Bs

1. The Table at the top indicated that all the B's (B1, B2, B3) were 5 bedroom, 4.5 baths (as well as the A's). This time, the DRAWINGS did not indicate that there was a 0.5 bathroom; the plans just said 5 BDRM 4 bath. (And there were no half-baths in the B units.) Looking at the plans, B1 and B2 both appeared to be 5 bedroom, 4 bath units, contradicting the table For B3, I did not see any plans for the top level of B3. (Is the package complete?) That is all the time I can devote to this. In summary, the plans are not labeled consistently, and do not appear to adhere to any well thought out architectural standards. (The highest "yuck" factor is reserved for the bedroom that requires people to pass through it to get to the bathroom.) (The second highest "yuck" factor is the fact that having the kitchen on the top floor means that two sets of stairs have to be climbed whenever you go grocery shopping.) These dwellings were obviously not designed for people to live in, long term.

From:	JAMES LIGHT	
То:	Eleanor Manzano; Lina Carrillo	
Cc:	Robert GADDIS; Sheila Lamb; Hazeltine Gale; Nils Nehrenheim; Zein Obagi; Todd Loewenstein; Bill Brand	
Subject:	For the Public Record on the Catalina Village Project Hearing Tonight	
Date:	Thursday, September 15, 2022 11:44:47 AM	

CAUTION: Email is from an external source; **Stop, Look, and Think** before opening attachments or links.

Please include my comments below in the public record for the Planning Commission Hearing on the Catalina Village Project this evening.

VR

Jim Light Sent from my iPad

In my opinion the traffic analysis is artificially understated. It starts with the trip generation assumptions. **Trip generation is understated**:

The analysis takes a significant discount on trips for the affordable housing. Without good transit in the immediate area, this discount is very unrealistic. Bus data for our area shows significant decline in use. And it shows that only households that cannot afford a car results in higher transit use when near a light rail stop. There is no light rail stop anywhere near the project - it is 20 to 30 minutes by personal vehicle to a greenline stop and longer by bus.

The analysis is further corrupted by the misapplication of residential type. The project seems to be intentionally masking impacts by cramming high bedroom counts into a single unit. This is more like dorm than a collection of single family units. And statements by the developer confirm that this is the intent. So it is unreasonable to believe that 5-10 working adults renting out a room with shared common spaces would only generate the 6+ trips the trip generation table assigns by residential unit. A per occupant or per bedroom allocation is the appropriate approach under this circumstance.

Another discount that is overly generous is the amount pedestrian/bicycle traffic projected for the coffee shop and brew tasting room. The Catalina Coffee shop parking lot was at near or over capacity during morning and evening peak hours. And we similar trends at Riviera Village with parking being difficult during peak hours. This evidence demonstrates that the coffee shop would generate more traffic and require more parking than the EIR assesses.

So the study is flawed from the generation table. The EIR would have to rerun the traffic related analyses to determine what impact these more reasonable trip generation rates would have on both VMT and on LOS.

### The intersection analyses are flawed on top of the understated trip generation

## from the project.

1) First, the analysis uses 1600 veh/ln/hr capacity for both Catalina and PCH. Both are overstated as both are impeded by on street parking, residential and business driveway entrances, stop sign controlled inflowing traffic, and in lane bus stops. And Catalina should be reduced below PCH capacity due to pedestrian and bike crossing traffic slowing intersections substantially, increased intensity of local resident and business driveways and cross traffic, and taking into account that Catalina traffic lights are not synchronized. Using 1600 vehicles per lane per hour as the capacity of Catalina ignores the conditions that would limit this number substantially. And equating Catalina to PCH lane capacity is simply laughable.

2) There is something significantly wrong with the intersection application of traffic for the existing + project case. Somehow they project that during AM rush hour, the project would generate 5 more southbound traffic trips on PCH at Herondo. And it generated only 11 northbound trips at this intersection. This makes no sense at all. The coffee shop and brew shop would not generate more traffic coming south at this hour. And residents would be going to work... at this intersection it would be to the north or east. The southbound flow makes no sense. It points to fudging data to artificially reduce the impacts in the most impactful traffic flows for the intersection. Further evidence is found looking at the cumulative impact for the same intersection. Somehow east turns from PCH/Herondo magically DECREASE in the morning rush hour. This should be going up with cumulative impacts. These misapplications of traffic artificially lower the V/C results in directions that are the critically saturated movements at the intersection.

3) The intersection of PCH/Herondo/North Catalina is treated as two separate intersections. Yet we know that the two intersections function as one interrelated, complex intersection - especially north bound. It takes several lights to clear northbound traffic on PCH and entering PCH from Catalina during peak morning rush hour. This analysis does not account for that complexity or reality. If a queue does not clear in a single light cycle, the LOS would be F. And small changes in traffic drive proportionally larger impacts on already over saturated movements.

4) These spot checks on the traffic analysis reveal significant flaws that make the entire analysis suspect. The traffic analysis should be redone with the more realistic trip generation and correcting the obvious errors noted in the spot checks and verifying that the other intersections are free of such flawed movement allocations.

### The other piece of the project that is severely undersupported is parking.

1) Catalina Coffee Company's lot was near or overcapacity during peak morning and evening hours. So the assumptions on pedestrian and bicycle customers is overstated and there is insufficient parking. Similarly, parking in Riviera Village shows a similar issue. During peak evening hours people circle to find parking. Yet the Village is surrounded by high density residential development... again, the evidence shows a large number of customers will drive and require parking.

2) Even with its inappropriate discounts for pedestrian and bike traffic, the trip generation table demonstrates the project is underparked for the commercial element.

The trip generation table shows around 60 car trips generated by coffee shop customers during peak hours. Since there is no drive up window, we can assume a 10 to 15 minute stop at best. At best 10 parking stalls would be required for the coffee shop alone - and that is an optimistic projection based on optimistic trip generation discounts due to bike and pedestrian trips. A more realistic assessment would be 17 to 20 spots... and even this is less than what existed for just Catalina Coffee. Six commercial spaces is laughable.

3) Residential parking - This type of development is unlikely to attract families with young children due to style and configuration. It will likely attract young workforce age people rooming in the same units to make the housing affordable. This would drive up the number of vehicles per unit. A ratio of >1 vehicle per bedroom is a much closer indication of the vehicles the residential component would attract. The residential component is a whopping 130 bedrooms... a number masked by the number of units. Units with 4 to 7 bedrooms dominate this project design. 66 residential parking spots is about half what this project should require. And that excludes guest parking which should be at least 10 parking spaces for the development per City code. That would drive a total of about 140 parking spaces.

4) Cumulative shortage - the project provides only 72 parking spaces. If you add the realistic parking need between commercial and residential the number of spaces required should be between 150 spaces and 160 parking spaces - that is a shortage of 78 to 88 spaces.

5) Exacerbating circumstances - this area is across from a park with no dedicated parking and is on the same block as an underparked and very popular liquor store/fast food store (Standing Room) and street parking on the block is constrained by extended red zones at either end. So street parking is not a viable mitigation for the severely underparking proposed in this project.

# The project and its environmental analysis violate CEQA, the Coastal Act and Redondo's Local Coastal Program.

1. The flaws noted above require at the minimum an update to the EIR. The detailed data wrt traffic was not publicly available until this meeting. So public could not have commented to this level of detail previously.

2) The severe parking shortage in the project's commercial AND residential development will drive significant use of public parking spaces in the Coastal Zone in the immediate vicinity of Czuleger Park (which is a valuable coastal viewshed per our LCP), the marina and the harbor. This is exacerbated by the facts that Czuleger Park has no designated parking and relies on Catalina Ave public street parking; and that Catalina is the last public road east of the Harbor/Pier in this area. Furthermore, the

parking situation is further exacerbated by street sweeping to meet Redondo's environmental requirements for stormwater discharge. Street sweeping cuts parking inventory in half in the area. With the uses already in place, parking would be over saturated for blocks due to the insufficient onsite parking provided by the project. This violates Redondo's LCP and the Coastal Act's access requirements.

3) Without a reassessment of the realistic trip generation by the project, the city cannot conclude that the traffic will not also create a barrier to access to nearby coastal resources. Should there be significant traffic impacts, the project would then be driving coastal access issues that would violate our LCP and the Coastal Act access requirements.

## The density of the project combined with the project design, site constraints, and the lack of sufficient onsite parking also represent health and safety impacts on the occupants and the broader community.

- 1. The design of the higher bedroomed units fails to account for isolation and protection of unrelated occupants from contagious diseases and from second hand smoke. The units have small bedrooms and baths and relatively undersized common use areas laundry, kitchen, dining, and living room. If one resident smokes or contracts a communicable disease such as Covid, the other residents have no means to isolate themselves sufficiently to avoid exposure and the adverse health impacts. The evidence of the spread of Covid demonstrated that high density housing creates a hotbed of spread.
- 2. In the event of a fire that blocks the single stairway, there is no second route for occupants to evacuate. The design of the facility should treat individual bedrooms as individual units and ensure a minimum of two safe egress routes. These are not designed as single family units per the developers own admission. Proper fire and other health and safety precautions should be required and designed in. This design is a death trap.
- 3. The underparking for the commercial AND residential components when combined represent a severely underparked project. This will drive excessive car trips along Catalina and through the surrounding neighborhood for residents, guests of residents, and customers of the commercial businesses. These impacts are not analyzed. With multiple pre-schools and day cares in the immediate vicinity and children walking to and from school, this represents a real safety hazard to the surrounding community. The situation will be exacerbated on Streep sweeping days where residents scramble the day before to ensure a legal parking space for the following day. It is not unreasonable to conclude that a substantive number of residents, guests, and customers would be frustrated by the search for parking which would lead to speeding, running stop signs and traffic signals, ignoring cross walks and bicycle traffic, and incidents of road rage which would be a further risk to public health and safety.

# With the multiple flaws in the environmental analysis, the violations of the LCP and Coastal Act, and the real and significant public health and safety impacts

of this project the Planning Commission should either substantially condition the project, or reject the project and its flawed EIR.

1. Should the Commission desire to approve the project, the following conditions should be mandated:

a) Each unit with more than three bedrooms should be required to have a minimum of two independent emergency egress routes; and, should have ventilation designed to isolate each bedroom and its assigned bathroom from any other living space in the project. Smoking of any kind and of any substance should be prohibited in any lease and sublease agreements. The lease and sublease agreements should require compliance with smoking restrictions as well as commitment to report and isolate in the case a resident contracts a communicable disease.

- b) The project and units be deed restricted to the number of vehicles per unit.
- c) The parking entrance/exit onto Emerald should be removed.

d) Commercial parking should be expanded to meet the reasonable demand at peak hours of each business.

e) The surrounding neighborhood (the block the project is on and one block north and south to include Broadway, Catalina and side street parking to PCH) should be subject to overnight permit parking only and the project's occupants should not be eligible for these permits.

2) If the Commission or applicant are unwilling to accept the above conditions, the Commission should reject the project and its EIR for health and safety impacts as well as the violations of the Coastal Act and our LCP.