



Administrative Report

J.3., File # PC21-3002

Meeting Date: 9/16/2021

To: PLANNING COMMISSION
From: SEAN SCULLY, PLANNING MANAGER

TITLE

A PUBLIC HEARING FOR CONSIDERATION OF THE CITY OF REDONDO BEACH 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND CERTIFICATION OF THE ASSOCIATED CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) DOCUMENT INITIAL STUDY/NEGATIVE DECLARATION

RECOMMENDATION:

1. Open public hearing;
2. Take testimony from staff and interested parties;
3. Close public hearing and deliberate; and
4. Adopt a resolution by title only subject to the findings contained therein:

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH, CALIFORNIA, RECOMMENDING THAT THE CITY COUNCIL ADOPT THE CITY'S 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND ASSOCIATED CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION, INITIAL STUDY/NEGATIVE DECLARATION

BACKGROUND

The Planning Commission is holding a public hearing to review, receive additional comments, provide recommendations, and to consider recommending that the City Council adopt the City's 6th Cycle 2021-2029 Draft Housing Element and the associated environmental documentation (Initial Study/Negative Declaration).

This "BACKGROUND" section presents brief **summary** remarks that include the following:

- **6TH Cycle 2021-2029 Draft Housing Element**
 - Background and Adoption Schedule
 - Housing Element Document Summary
- **City of Redondo Beach 6th Cycle Regional Housing Needs Allocation (RHNA)**
 - Redondo Beach's Housing Element Sites Inventory
 - State's Criteria for Qualifying Housing Sites to Include in a Housing Element Housing Sites Inventory
 - Applicable State Housing Laws
- **Public Participation**

- **Background and Summary**
- **Summary of Public Comments and City Responses**
- **Summary of State Housing and Community Development Department Comments and City Responses**

6TH Cycle 2021-2029 Draft Housing Element

Background and Adoption Schedule

The current 5th Cycle Housing Element was originally adopted by the City Council on March 18, 2014, covering an 8-year cycle from 2013-2021. However, since the City adopted the 5th Cycle Housing Element past the statutory deadline, the City was required to conduct a mid-term (4-year) update to the Housing Element in 2017. The City adopted the 2017 Technical Midterm Update to the 5th Cycle 2013-2021 Housing Element on September 19, 2017, which was prior to the statutory deadline of October 15, 2017. Provided the City adopts the 6th Cycle 2021-2029 Housing Element on or before October 15, 2021 the City will have adopted two (2) consecutive Housing Elements on time and will therefore be on an eight-year Housing Element cycle to begin in 2021 moving forward.

A copy of the City's 6th Cycle 2021-2029 Draft Housing Element ***is downloadable via a "link"*** provided with the list of "**Attachments**" at the end of this report.

Please note that formal written comments on the draft Housing Element from the State's Housing and Community Development Department (HCD) were just received on September 2, 2021 and revisions, in response to their comments, to the draft Housing Element are ongoing. A copy of HCD's comment letter is attached and a summary of HCD's comments along with the City's approach for addressing their comments is included at the end of this Administrative Report (see "**Summary of State Housing and Community Development Department Comments and City Responses**" section). All edits that City Staff and the consultant are able to make in response to HCD prior to this Planning Commission's public hearing will be provided as a "Blue Folder" item on September 16, 2021. Those comments that require additional time to address will be discussed further in the HCD summary section noted above.

The City of Redondo Beach must adopt the Housing Element by October 15, 2021 in order to move to an eight (8) year Housing Element Cycle rather than the City's current four (4) year Housing Element Cycle. To ensure we meet this deadline the following schedule with status is presented herein:

Required Task	Schedule	Status
CEQA (ND/MND)	June-September 2021	Complete pending approval by City Council – Comment period on CEQA document ended September 3, 2021. Two (2) comment letters received and are attached to the environmental document (IS/ND). Final IS/ND is prepared and attached for Planning Commission's review and recommendation.
HCD 60-Day Review	July 13, 2021-September 12, 2021	Comments received from HCD on September 2, 2021. Responses/edits to the element are ongoing.
Planning Commission Hearing	September 16, 2021	On track
City Council Adoption	October 5, 2021	On track
Deadline for Adoption	October 15, 2021	On track

DEPARTMENT'S RECOMMENDATION

Staff is requesting that the Planning Commission advance the draft Housing Element to the City Council for their consideration at their meeting planned for October 5, 2021. Following the Planning Commission's and City Council's actions on the Housing Element it is anticipated that some changes may still be required of the element in order to gain final approval/certification by HCD. Staff anticipates that prior to HCD's certification of the 6th Cycle 2021-2029 Housing Element an amended element is expected to be brought back to the Planning Commission and City Council again for final action before January 2022 that reflects HCD's required changes. This re-review of the element does not jeopardize the City moving to the eight (8) year housing cycle. As long as the City initially adopts the element before October 15, 2021 the City will be moved to the eight (8) year housing cycle going forward.

Within the attached Planning Commission Resolution are the necessary findings for advancing the Housing Element inclusive of language acknowledging some additional amendments to the Housing Element as necessary for addressing HCD requirements and a notation anticipating that prior to final certification by HCD of the City's 6TH Cycle 2021-2029 Housing Element it be reviewed again by the Planning Commission and City Council.

Housing Element Document Summary

As part of this current Housing Element Update, Redondo Beach has identified ways to reduce regulatory, physical, and environmental constraints to the production of housing and a sufficient amount of developable land that can accommodate the City's assigned housing growth. This process and the resulting documentation serve to identify and designate specific housing sites for the City to meet its Regional Housing Needs Allocation (RHNA) of 2,490 units for the 6th Cycle. This Housing

Element update process included significant outreach efforts to obtain input, allay concerns, and identify solutions from the local community - bringing the public along with the overall planning effort.

Overall, the Housing Element provides a policy-level foundation to expand housing production, coupled with a strong implementation plan that includes specific quantified objectives and programs with some mandates for execution in the first part of the planning period (e.g., within the first three years conduct rezoning as needed to accommodate the RHNA, Section 65583(c)(1)(A) and 65583.2 (c) of Government Code).

Herein is an outline of the component Chapters and Sections included within the 6TH Cycle 2021-2029 Draft Housing Element inclusive of the Appendices:

2.2.1 Introduction

- A. Community Context
- B. Role of Housing Element
- C. Public Participation
- D. Relationship to Other General Plan Elements

2.2.2 Housing Needs and Resources

- A. Population
- B. Households
- C. Housing Problems
- D. Special Needs Groups
- E. Housing Stock

2.2.3 Constraints on Housing Production

- A. Governmental Constraints
- B. Non-Governmental Constraints

2.2.4 Housing Resources

- A. Availability of Sites for Housing
- B. Housing Resources

2.2.5 Housing Plan

- A. Conserve and Improve the Existing Housing Stock
- B. Assist in the Development of Affordable Housing
- C. Provide Adequate Housing Sites
- D. Remove Governmental Constraints
- E. Provide Equal Housing Opportunities
- F. Summary of Quantified Objectives

Appendix A: Review of Past Accomplishments

Appendix B: Detailed Residential Sites Inventory

Appendix C: Public Participation

Appendix D: Affirmatively Furthering Fair Housing

City of Redondo Beach 6th Cycle Regional Housing Needs Allocation (RHNA)

The City has been assessed a 6th cycle RHNA of 2,490 units in the following income distribution:

- 936 Very Low Income
- 508 Low Income
- 490 Moderate Income

- 556 Above Moderate Income

It's important to note that the City is only required to demonstrate in the Housing Element that it has the capacity for these housing units and types to be developed. It is not a requirement that they are developed, nor is it an approval of any specific projects.

Redondo Beach's Housing Element Sites Inventory

Pursuant to Senate Bill (SB) 166 (No Net Loss), to ensure the City continues to accommodate the RHNA throughout the planning period as sites are developed, the City Council approved a Housing Element Sites Inventory with a 10 percent buffer for the lower income RHNA. No buffering should be required for moderate and above-moderate income categories. The target sites inventory, as approved by the City Council at their June 15, 2021 public meeting, has the capacity to accommodate 2,635 units in the following income distribution:

- 1,030 Very Low Income (inclusive of 10 percent buffer)
- 559 Low Income (inclusive of 10 percent buffer)
- 490 Moderate Income
- 556 Above Moderate Income

Per Council direction on June 15, 2021, the Housing Element Sites Inventory is summarized below:

	Density	Very Low and Low	Moderate	Above Moderate	Total
RHNA	---	1,444	490	556	2,490
RHNA w Very Low and Low 10% Buffer	---	1,589	490	556	2,635
Credits					
ADUs (SCAG Income Affordability Study)	---	144	14	82	240
Galleria (Project Entitled)	---	30	0	270	300
Alcast Foundry	---	0	0	36	36
Total Credits	---	174	14	388	576
Sites Inventory					
Residential Recycling	14.6-30.0	0	500	300	800
Galleria-North Kingsdale*	45.0	0	72	0	72
Galleria-South Transit Center (Industrial Flex – Residential Overlay)**	55.0	273	0	0	273
Tech District (Commercial Flex – Residential Overlay)	60.0	700	0	0	700
PCH South (Mixed Use 1)	30.0	160	0	0	160
PCH Central (Mixed Use 2)	35.0	30	70	0	100
PCH Central (RH – AB 1851)	30.0	28	0	0	28
Meyer Lane/190 th	45.0	122	0	0	122
Mary Ann Drive/190 th	45.0	130	0	0	130
Lamp Plus Site	45.0	32	0	0	32
Total Sites		1,475	642	300	2,417
Total Capacity (Credits + Sites)		1,649	656	688	2,993
Surplus		60	166	132	358

* At their public

meeting on June 15, 2021, City Council approved a dwelling unit capacity for the Galleria - North Kingsdale area of 72 units for the “Very Low and Low” affordable income categories. In their review of the City’s Housing Element, HCD required the 72 dwelling unit capacity for this “housing site” be included in the “Moderate” income category citing concerns with small lot consolidation.

** At their public meeting on June 15, 2021, City Council approved a reduction in the maximum density for the Galleria - South Transit Center area (Industrial Flex - Residential Overlay) from 70 DU/AC to the surplus amount and at a level that still complies with SF 166 (No Net Loss) requirements, which for the Galleria - South Transit Center site resulted in a reduction to 55 DU/AC.

Attached to this Administrative Report is the City Council approved Draft Land Use Plan that identifies all the housing sites in the Draft Housing Element demonstrating capacity to accommodate the City’s RHNA.

Additionally, included within Section A. Availability of Sites for Housing of Chapter 2.24 Housing Resources of the Draft Housing Element (attached as a link) is a comprehensive discussion of each of the sites that comprise the City’s determined “housing sites inventory” for purposes of demonstrating capacity to accommodate RHNA.

State’s Criteria for Qualifying Housing Sites to Include in a Housing Element Housing Sites Inventory

In 2017, the State passed Assembly Bill (AB) 1397 (Adequate Sites) that substantially tightened the

criteria for qualifying sites for RHNA. Key requirements are:

- Default density of 30 units per acre is required for facilitating lower income housing.
- Sites smaller than 0.5 acre and sites larger than 10 acres are not considered feasible for facilitating lower income housing.
- Reusing vacant sites used in the 4th and 5th cycle Housing Elements and nonvacant sites used in the 5th cycle Housing Element is subject to higher standard of feasibility criteria, based on existing uses, property conditions, development interest, and trend of redevelopment, among others.
- If rezoning after October 2021 is needed to accommodate the RHNA, at least 50 percent of the lower income RHNA must come from residential sites or mixed use/nonresidential sites that allow standalone residential.
- If more than 50 percent of the lower income RHNA is being accommodated on nonvacant sites, adoption of the Housing Element must include a Finding that the City believes the existing uses on site can cease to operate during the 8-year planning period.

Applicable State Housing Laws

The following recently-adopted housing laws from recent years have impacted what the Housing Element must accomplish for municipalities, including affordability, no net loss, facilitation of ADU's, and Affirmatively Furthering Fair Housing component, and addressing special-needs populations.

By-Right Approval of Projects with 20 Percent Affordable to Lower Income Households (AB 1397) required for:

- Reusing vacant sites used in the 4th and 5th cycle Housing Elements and nonvacant sites used in the 5th cycle Housing Element.
- Rezoning of sites after October 2021 to accommodate the RHNA.

Monitoring of No Net Loss (SB 166) - Develop a procedure to monitor for No Net Loss. When the sites in the inventory are developed, the City must monitor the number and income level of the units built, compared to the Housing Element assumptions for the sites. If a shortfall in sites is identified due to developments at market yielding fewer or no affordable units, the City must make findings that the City's sites inventory continues to have adequate capacity for the remaining RHNA, identify replacement sites, or rezone/upzone within six months to replenish the sites inventory.

Replacement Housing (AB 1397) - As a condition of project approval, development on a residential site that currently has existing units must replace the units that are deed restricted for or occupied by lower income households. The replacement requirements under AB 1397 are the same with Density Bonus law.

Facilitation of ADUs (AB 68) - Housing Element must include incentives to facilitate the development of ADUs and a monitoring of ADU trends to ensure consistency with assumptions in the Housing Element.

Affirmatively Furthering Fair Housing (AB 686) - Housing Element must include an AFFH analysis

that looks at existing conditions regarding segregation and concentration of poverty, and the distribution of the sites inventory. The Housing Element needs to identify actions that the City will undertake to foster housing mobility, facilitate neighborhood improvements, mitigate displacement, and provide housing choices in new locations.

Zoning Revisions for Special Needs Populations:

- AB 139 (Emergency Shelters) - Revise parking standards for the emergency shelter overlay to be based on staffing level instead of shelter capacity
- AB 101 (Low Barrier Navigation Centers) - Revise zoning code to permit low barrier navigation centers (temporary housing for those at risk of homelessness) in mixed use/nonresidential zones that allow housing.
- AB 2162 (Supportive Housing) - Revise zoning code to permit supportive housing meeting specific criteria in multi-family and mixed-use zones. If the specific supportive housing is located within half mile from transit, no minimum parking can be required.

Public Participation

“Appendix C: Public Participation” within the 6TH Cycle 2021-2029 Draft Housing Element includes a detailed accounting of the Housing Element public engagement process dating back to the beginning of housing discussions with the General Plan Advisory Committee (GPAC) in 2017. Below is a summary of Appendix C: Public Participation.

Background and Summary

In addition to the GPAC’s 22 meetings to date, there have been three community wide meetings and multiple public hearings before the Planning Commission and City Council. Housing and mixed-use development, and specifically where and at what densities, has been the most pressing topic throughout the process. As the City began to formulate the land plan it became clear that housing was the most critical issue facing the City going forward. Significant education and outreach were required in order to set the stage for updating the City’s Housing Element. The Housing Element team as well as other planning and economic development professionals were critical to educating the community on the importance of providing housing in support of all incomes throughout the City.

The City advertises the public meetings via press releases, FaceBook posts, email blasts, cable TV advertisements, posting on the City’s General Plan Update and Housing Element Update landing pages which have collected 1,200 email addresses for notification, as well as the City’s Community Services Newsletter that is sent to over 11,000 email addresses.

In summary of the City’s public engagement process the following is presented (see additional details and full descriptions of public participation in Appendix C of the Draft Housing Element):

- GPAC Meetings
 - Twenty-two meetings to date, many of which focused on housing and specifically where and at what densities.
 - GPAC Meeting 22 (December 3, 2020) focused entirely upon the City’s housing sites inventory.
- Community Workshop (November 17, 2018)
- City Council Inclusionary Housing Presentation (January 12, 2021)

- Community Workshop - Online (April 7, 2021)
- Social PinPoint Land Use Plan Survey (April 7 - April 11, 2021)
 - 349 comments received.
- Planning Commission Meeting (April 15, 2021)
 - The Planning Commission received public input on the Revised GPAC Recommended Land Use Plan and worked on balancing community input and achieving the RHNA.
 - The Planning Commission provided recommendations for consideration by the City Council, including increasing density at specific locations and adding sites to the Residential Overlay.
- City Council Meetings (April 20, May 4, May 11, May 18, and June 15, 2021)
 - The City Council considered the Housing Element, RHNA, and adequate sites requirements over multiple meetings.

Public Comments and Responses

Attached to this Administrative Report are all written comments received on the 6TH Cycle 2021-2029 Draft Housing Element as of the date of this report. Commenters included the general public (including City of Redondo Beach property owners), a non-profit affordable housing organization, the State Department of Housing and Community Development (HCD) and Caltrans. In addition to the comments received on the Draft Housing Element, written comments were also received on the associated environmental document. The comments on the environmental document, as well as the City's responses to the environmental comments, are attached as an appendix to the draft environmental document which is also attached to this Administrative Report.

Although not required by State Housing or Environmental laws, the City is providing a response to all comments received on both the Draft Housing Element and the associated environmental document. The City's responses will be provided as a "**Blue Folder**" item on September 16, 2021.

The following section of this Administrative Report presents a general summary of HCD's comments and the City's responses.

State Housing and Community Development Department Comments and City Responses

Since the Draft Housing Element document under consideration by the Planning Commission is subject to change as a result of HCD's comments, see attached HCD letter dated September 2, 2021, it is important to include a summary of HCD's comments herein and specifically how the City anticipates addressing the comments. Again, it is important to note that a revised Housing Element (when ready for certification by HCD) is expected to be brought back to the Planning Commission prior to 2022.

HCD's correspondence opens with documentation of their review timeline and multiple communications/revisions that have occurred since the document was submitted to HCD on July 13, 2021. Their opening remarks also identify the commenters that submitted directly to HCD, all of which are included as attachments.

The correspondence further notes that the draft element addresses many statutory requirements; however, revisions will be required to demonstrate "adequate sites" for accommodating the City's

regional housing needs allocation of 1,444 housing units for lower-income households, “affirmatively furthering fair housing” (AFFH), and various Housing Programs included in the element. The following is a summary of HCD’s concerns followed by the City’s anticipated actions/edits to the current document in order to address stated concerns.

Affirmatively Furthering Fair Housing (AFFH) - HCD Comment(s)

Integration and Segregation: The comparison of segregation levels at the regional and local levels must be complemented by local knowledge and relevant factors supporting conclusions.

City Response: The City will present additional information further describing historical trends towards zoning and housing development that better informs this issue area.

AFFH Site Inventory - HCD Comment(s)

The element must include accompanying analysis to evaluate the site inventory’s consistency with the City’s obligation to AFFH. The site inventory analysis should address how the sites improve or exacerbate conditions relative to access to opportunity; segregation and integration; racially and ethnically concentrated areas of poverty and affluence; and disproportionate housing needs, including displacement risk based on local data, knowledge, and other relevant factors.

City Response: The City will present additional information concerning planned development of an inclusionary housing ordinance, to address access and opportunity and concentrations of affluence and will further investigate measures to address displacement risks going forward.

Adequate Sites - HCD Comment(s)

The City has a regional housing needs allocation (RHNA) of 2,490 housing units, of which 1,444 are for lower-income households. To address this need, the element relies on nonvacant sites which require rezoning to a Residential Overlay Area which in turn requires approval of the electorate. To demonstrate the adequacy of these sites and strategies to accommodate the City’s RHNA, the element must include complete analyses:

- Electronic Sites Inventory: upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.
- Suitability of Nonvacant Sites (North Tech District): Table B-2 of the element identifies five nonvacant sites on 14.26 acres within the North Tech District as sites for residential overlay zoning to accommodate over half of the City’s RHNA shortfall for lower-income households. Additional analysis is required to establish the adequacy of the sites and that existing uses do not preclude development within the planning period. If additional analysis does not establish the adequacy of the sites, the element will need to identify alternate sites for rezoning.
- Small Sites: Each site must accommodate a minimum of 16 units. Several sites have capacity estimated under 16 units and do not meet this threshold. The element may utilize an aggregation of parcels to be a “site”; however, the element must include analysis to establish conditions on the sites are suitable for consolidation and development within the planning period. Absent the required analysis, the following sites/APNs are ineligible to accommodate any of the shortfall for lower-income RHNA:
 - 7510030058 (1756 S Pacific Coast Highway (site is 23,834 SF));
 - 4158010022 (510 Meyer Lane);

- 4158011011 (553 Mary Ann Dr);
- 4158011012 (575 Mary Ann Dr);
- 4158011007 (601 Mary Ann Dr);
- 4158011006 (615 Mary Ann Dr);
- 4158011005 (621 Mary Ann Dr);
- 4158012025 (630 Mary Ann Dr); and
- 4158012024 (2408 Fisk Lane).

City Response - Electronic Sites Inventory: The City will submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov [<mailto:sitesinventory@hcd.ca.gov>](mailto:sitesinventory@hcd.ca.gov).

City Response - Suitability of Nonvacant Sites (North Tech District): Recognizing the viability of the existing non-residential uses the City envisions that the majority of residential development on this site would be developed above the existing large parking lots. Additional descriptions of the envisioned planning standards to allow existing uses to remain and allow new residential will be incorporated in the element to address HCD's concern. Additionally, the City plans to engage the property owners to secure their interest in future additional residential development at this location.

City Response - Small Sites: Staff is further investigating the list of sites identified by HCD as potentially to small. The majority of the identified small sites, are all within the two (2) Industrial areas adjacent to 190th Street, are contiguous for lot consolidation, and surrounded by residential development. The City will engage existing property owners of these sites to gauge support/interest for future high density residential and provide more details on existing age of structures and recent turnover of uses demonstrating some instability with existing development and likeliness for redevelopment as residential.

Housing Programs - Adequate Sites - HCD Comment(s)

The element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. Since the element does not identify adequate sites to accommodate the regional housing need for lower-income households, it must include a program to identify sites with appropriate zoning to accommodate the regional housing need within the planning period. The program must commit to:

- Permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a conditional use permit, planned unit development permit, or other discretionary review or approval.
- Accommodate a minimum of 16 units per site.
- Require a minimum density of 20 units per acre; and
- At least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites:
 - Allow 100 percent residential use, and

- Require residential use occupy 50 percent of the total floor area of a mixed-use project.

City Response - Housing Programs - Adequate Sites: Staff is further investigating the sites questioned by HCD and plans to provide the additional information necessary to demonstrate the currently proposed sites are adequate to accommodate the City's capacity for 1,258 units for lower-income households. If it is determined that additional housing sites are required, those discussions will be re-engaged with the community, Planning Commission, and City Council in order to accommodate the City's required RHNA. Staff does not anticipate the need to add this program at this time.

Housing Programs - Program 2 (Preservation of Affordable Housing) - HCD Comment(s)

The element describes Seasons Senior Apartments as having a high likelihood of converting to market rate in 2025. As such, Program 2 (Preservation of Affordable Housing) should be revised to include actions specific to Seasons Senior Apartments.

City Response - Preservation of Affordable Housing: Staff will amend this program to include a commitment by the City to proactively engage the owner and property manager to provide education and ensure their understanding of their obligations under preservation law.

Housing Programs - Program 12 (Accessory Dwelling Units) - HCD Comment(s)

The element is required to include a program that incentivizes or promotes ADU development specifically for very low-, low-, and moderate-income households. While Program 12 (Accessory Dwelling Units) includes some actions to promote ADUs, it must be revised to include specific actions to the development of affordable ADUs.

City Response - Accessory Dwelling Units: Within HCD's comments on this issue are a number of suggested additional incentives to include within this program, including but not limited to, flexible zoning requirements, development standards, or processing and fee incentives that facilitate the creation of ADUs, such as reduced parking requirements, fee waivers and more. Staff is investigating additional strategies and will include them in the revised element.

Housing Programs - Program 13 (Amendments to the Zoning Ordinance) - HCD Comment(s)

Program 13 (Amendments to the Zoning Ordinance) includes an action to "amend the parking standards to reduce the burden on smaller units, including adjusting the number and type of parking spaces required". This program should be revised to amend the parking standards for all multifamily development, not just for a subset of smaller units.

City Response - Amendments to the Zoning Ordinance: The City will be assessing parking and other development policies as they relate to the City's continued work plan for the General Plan update and plans to engage the GPAC on land use element development policies, including parking and as part of this effort a firm date for the development of parking standards can be determined and integrated into this program.

Housing Programs - Program 14 (Objective Design Standards) - HCD Comment(s)

Program 14 (Objective Design Standards) should be revised, or an additional program added, to

explicitly commit to establishing objective design standards for the four overlay residential districts (North Kingsdale, North Tech District, 190th Street, and Industrial Flex - South of Transit Center) by a specific date.

City Response - Objective Design Standards: The City is assessing the continued work plan for the General Plan update and plans to confirm a schedule for engaging the GPAC on land use element development policies and as part of this effort a firm date for the development of Objective Design Standards can be determined and integrated into this program.

Housing Programs - Program 15 (Monitoring the Effect of Article 27 of the City Charter (Measure DD)) - HCD Comment(s)

Program 15 (Monitoring the Effect of Article 27 of the City Charter (Measure DD)) should be revised to identify the relationship between the approval of the electorate on the November 2022 ballot measure and continued housing element compliance.

City Response - Monitoring the Effect of Article 27 (Measure DD): The element will be amended to include language acknowledging that the City must take additional action to retain housing element compliance if the electorate rejects the ballot measure.

Housing Programs - Program 15 (Fair Housing Program) - HCD Comment(s)

Program 15 (Fair Housing Program) includes a list of contributing factors and their priority as well as specific program actions. However, many contributing factors have no associated program actions. The program should be revised to ensure all contributing factors have associated actions the City will implement and it should be revised to also include actions to promote mobility and access to opportunity. Additionally, Program 15 should be revised to replace non-committal language such as “if feasible”, “assess the feasibility of”, or “assess” with language that commits to follow-up actions.

City Response - Fair Housing Program: The City is amending this program and plans to add the specific actions to address the “contributing factors” noted, promote mobility and access to housing, and strengthen the language to commit follow-up actions as they relate to this program.

Public Participation - HCD Comment(s)

The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate.

City Response - Public Participation: Staff plans to engage property owners as noted in earlier “City Responses”, element commenters, the housing development community, and the public after revisions are made to the element per HCD’s comments. Additionally, a revised element is expected to be brought back to the Planning Commission and the City Council prior to January 1, 2022 that will provide additional opportunities for increased public participation.

ENVIRONMENTAL STATUS:

Since the 2021-2029 Housing Element is a policy document, the land use designations and zoning amendments associated with the Housing Element are not under consideration at this time. The

amendments to the General Plan land use designations and associated zoning amendments (for consistency) will be processed as part of PLANRedondo, the ongoing General Plan update to the Land Use Element and Land Use Map. The 2021-2029 Housing Element stipulates that the City must complete the land use and zoning amendments by November 2023, either as part of or regardless of the adoption of PLANRedondo to ensure consistency between the 2021 Housing Element and the General Plan at that time.

Although no actual changes to the City's land use designations or zoning are associated with the Housing Element, the City nevertheless conducted an Initial Study consistent with CEQA and determined that no environmental impacts are anticipated and a Negative Declaration is proposed. Attached to this report is a copy of the proposed Initial Study and Negative Declaration along with an appendix that contains comments received and the City's responses to comments. The public review period was advertised from August 5, 2021 to September 3, 2021.

The City proposes to adopt a Negative Declaration for the 6th Cycle 2021-2029 Housing Element, "the project". The Negative Declaration is based on the finding that the project would not have any significant environmental impacts and as such, does not require any mitigation measures. The reasons to support such a finding are documented by an Initial Study prepared by the City. Additionally, a finding to this effect is included in the attached Planning Commission Resolution

ATTACHMENTS

Draft Planning Commission Resolution

City's 6th Cycle 2021-2029 Draft Housing Element

HCD Comment Letter, September 2, 2021

Final Initial Study Negative Declaration with Comments and Responses

Land Use Plan City Council approved June 15, 2021

Public Written Comments