

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 16, 2021

J.3. 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

CONTACT: SEAN SCULLY, PLANNING MANAGER

- Written public comments received after release of agenda

From: Mark Nelson

Sent: Friday, September 10, 2021 7:17 PM

To: Brandy Forbes <Brandy.Forbes@redondo.org>

Subject: Fwd: Draft Housing Element Final IS/ND and Planning Commission Report Now Available



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

I have yet to review the full policy document, but the path forward to PlanRedondo and this particular Neg Dec look perfectly reasonable. Thanks!

From: Mark Nelson

Sent: Monday, September 13, 2021 12:56 PM

To: Brandy Forbes <Brandy.Forbes@redondo.org>

Cc: CityClerk <CityClerk@redondo.org>

Subject: Public Comment to Planning Commission Upcoming Meeting on RESOLUTION NO. 2021-**-PCR-**



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

Commissioners and Director:

The Commission's resolution labeled RESOLUTION NO. 2021-**-PCR-** contains a material inaccuracy regarding the outreach effort. Specifically, it states that "groups" such as BCHD were contacted. BCHD is a government district, not a group. Furthermore, BCHD has an organizational self interest as it attempts to develop a 133-foot above the street, nearly 800,000 sqft development that is roughly the size of Staples Center. BCHD also made materially inaccurate comments in public that its project could qualify for RHNA, which is objectively false for a facility charging \$7,500 to \$12,500 per month rent for senior living. As such, it is clear that BCHD was simply posturing for its project, which will be 100% commercially constructed and operated, and 80% owned by commercial entities. Therefore, BCHD comments are no different than any commercial comment and must be accurately represented.

Mark Nelson
3+ Year BCHD Volunteer
Redondo Beach

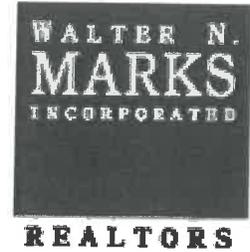
cc: Public Comment City Council Meeting

From: [Mike Martin](#)
To: [BBHousingElement](#)
Subject: RE: Draft Housing Element Final IS/ND and Planning Commission Report Now Available
Date: Saturday, September 11, 2021 4:49:43 PM
Attachments: [6528A10FF5074B919A77E5B4A7E4E8D2.png](#)

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

“Description” needs to be edited to match “density/intensity” column in Draft Land Use Definitions. Especially in PI and OS.

Land Use Category	Density/Intensity	Description
PUBLIC / INSTITUTIONAL / OPEN SPACE		
Public/Institutional (PI)	Max. FAR 1.25 0.75 FAR (1.25 FAR at City Hall bounded by PCH, Broadway, Carnelian St, and Diamond St; 1.25 FAR at the Annex site on Northeast Corner of PCH and Vincent St) (subject to Planning Commission Design Review)	Provides for governmental administrative and capital facilities, schools, libraries, hospitals and associated medical offices, public cultural facilities, and other public uses including residential-care facilities for the elderly , ancillary parks, recreation and open spaces. <i>Maximum FAR 1.25 (subject to Planning Commission Design Review).</i>
Public/Utility (U)	Max. FAR 0.10	Provides for utility uses including easements with public access for recreation and parking. <i>Maximum FAR 0.10.</i>
Parks and Open Space (OS)	Max. FAR [0.25] 0.20	Provides for public open space, passive park uses, sports fields, active recreation uses, and coastal-related recreational activities as well as accompanying public facilities such as restrooms, picnic pavilions, parking facilities, and lifeguard towers. <i>Maximum FAR 0.25.</i>



Redondo Beach
Housing Element Document
Planning Commission – Item J.3

September 15, 2021

I support this Housing Element document as it is concerned with specifically identifying ways in which the housing needs of existing and future resident populations can be met. Moreover, the focus on improving existing affordable housing, finding developments for affordable housing, and promoting equal housing opportunities, all the while, removing governmental and other constraints to housing development, in general, is laudable.

I hope this body will keep in mind that these policy decisions will only be achieved, and thus realized in the built environment, through updated zoning and the soon-to-be created Inclusionary Housing Ordinance.

If yesterday's zoning continues to dictate, and thus limits the ability for architects and property owners to imagine new ways to build (read: climate resiliency), adapt to work-from-home phenomenon, and make Redondo Beach the most desirable place to live, work and play.

Further, incentive based policies that enhance the construction of affordable units throughout Redondo Beach will be imperative to nudge property owners to extend themselves and include affordable units. I have witnessed firsthand that lack of built affordable units because the incentives fell short.

In the months and years ahead, this body and the City Council has the ability to craft forward-thinking policies ensuring that the new housing (of all types and income levels) to be built in our City will benefit the residents, then the community and thus the City through the economic development that it all incites.

Thank you.

A handwritten signature in blue ink that reads "Wally Marks". The signature is written in a cursive style and is positioned above a horizontal line.

Wally Marks

Property owner: 2810-2860 Artesia Boulevard



[Read about the coalition here](#)



JOHN JACKSON



ABUNDANT HOUSING LA



Ending Isolation and Homelessness in Hollywood

THE CENTER



LACBC



Building a Movement in the Eastside





DOWNTOWN **WOMEN'S** CENTER safe place for youth



September 14, 2021

Redondo Beach City Council
Redondo Beach City Hall
415 Diamond Street
Redondo Beach, CA 90277

Dear Councilmembers:

Why does this matter? Because we face a cascade of housing crises in our region. And while nearly everyone in Los Angeles County feels the crush of our housing crisis, Black and Latino residents feel it more than most:

- Black households have 1.12% the wealth of white households, and Latino households less than 5% (Federal Reserve Bank of San Francisco)
- Black people make up 8% of the county population, but 33.7% of people experiencing homelessness (LAHSA)
- Even under COVID-related eviction moratoriums, Black and Latino neighborhoods face disproportionately higher eviction threats (Los Angeles Times, UCLA)
- One in four AAPIs pay more than half of their income toward housing costs compared to whites (16 percent), putting many on the edge of financial vulnerability. This segment of the population is considered severely cost-burdened (Crisis to Impact Report, A joint publication of the National Coalition of Asian Pacific American Community Development and the University of California, Los Angeles)

These are the effects of decades of racist policies that we have not eradicated: Restrictive covenants, exclusionary zoning, and redlining made it impossible for Black families to build wealth through homeownership, and result in lower homeownership and higher rents today. The California Constitution's Article 34 and local "crime-free housing" policies put roadblocks in the way of addressing racial divisions in Californians' housing affordability and security.

This impact was felt devastatingly during the pandemic, when essential workers living in overcrowded housing were exposed to COVID at work and had no choice but to expose their families at home, leading to disproportionate deaths among Black and Latino people. Neighborhoods in South and Southeast LA, where nearly 20% of homes are overcrowded (defined as more than one person per room) had COVID rates of roughly 14,000 cases per 100,000 people. Neighborhoods on the Westside, where less than 5% of homes are overcrowded, had rates well under 5,000 cases per 100,000 people.¹ Death rates were similarly disproportionate -- at a time (January 2021) when the city of Beverly Hills was reporting 21 COVID deaths, and the neighborhood of Brentwood 9, the city of Compton reported 147, and the neighborhood of Westlake 202.² In all, COVID-19 mortality rates in LA County were roughly twice as high for Black people (31 deaths/100,000 individuals) and Latinos (29/100K) as for whites (15/100K) (from CGLA).

Of the 3,007 counties in the United States, L.A. County ranks last in housing affordability, overcrowding, and unsheltered homelessness. We are not doing enough to preserve and create homes for working class and lower-income people. The affordable housing crisis, rampant speculation, lack of tenant protections and rent control, and affordable housing shortage have gotten so bad that lower-income Black, Latino and AAPI families are being pushed out of their homes and communities at an alarming rate. At the rate we're going, next generations won't be able to live in Los Angeles County.

Los Angeles County is legally required to build 341,000 affordable homes by 2030. [To truly address our needs, we need more than double that.](#) At the rate we're going today, we might build 25,000. That's 7% of what's needed. That kind of failure will fall hardest on Black and Latino families, who disproportionately face eviction, homelessness and having to choose between rent and food. Our Future LA demands we not let that happen.

In order to create a better housing future, we must make every neighborhood resource-rich so people can live where they want to live and don't have to leave their community to find opportunity. The Housing Element must also consider the intersection between housing, public health, and environmental justice. The very communities facing the highest rent burden are often the same communities who bear the brunt of the negative impacts brought on by environmental contamination and exposure to the worst air and soil qualities. For example, in LA County, 75% of active oil wells are located within 2,500 feet of homes, the vast majority of which are occupied by low-income people of color. We must also achieve equitable land use and zoning so that historically exclusionary communities build at greater densities, with value

¹ ["When coronavirus invaded their tiny apartment, children desperately tried to protect dad". LA Times, 1/29/21](#)

² ["We Are Forced to Live in These Conditions': In Los Angeles, Virus Ravages Overcrowded Homes". NY Times, 1/23/21](#)

capture, while also ensuring that areas already zoned for density are protected from environmental and spatial racism and displacement pressures. As the region plans for growth, there must be no conversion of wildlife habitat to housing or further development in wildfire hazard areas, as identified by CalFire. We understand that Redondo Beach cares deeply about these issues, and we hope to offer assistance in addressing them.

As it stands right now, the draft housing element will not meet Redondo Beach's goals around equity and affordability. We submit these comments in the spirit of collaboration in order to partner and provide research, grounded data to help in meeting housing needs. We are interested in having a meeting to discuss these comments more.

Our Future LA Housing Element Comments

1. Protections

- A. The housing element should expand just-cause eviction protections to cover all tenants and establish a corresponding enforcement program.**
- B. The housing element should implement a local RSO or strengthen/reduce the annual allowable rent increase for the existing RSO program.**
- C. The housing element should codify a tenant's right to counsel in an eviction proceeding.**
- D. The housing element should strengthen its permanent tenant education program to inform tenants of their rights and how to access eviction defense resources.**
- E. The HE should create and implement a tenant anti-harassment ordinance combined with enforcement resources.**

2. Preservation

- A. The housing element must do more to prioritize rezoning - with value capture - in high-resource neighborhoods which are transit- and job-rich, including single-family zoned areas. This is necessary to expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.**
- B. The housing element should exclude parcels containing RSO housing units in the housing element's site inventory.**
- C. The housing element should require that no net loss provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.**

D. The housing element should institute local programs and funding sources for preservation of existing affordable housing.

3. Prioritization of affordable housing

A. The housing element should utilize a value capture mechanism, such as inclusionary zoning, to locally fund and/or incentivize affordable housing.

B. The housing element should prioritize creation of affordable housing on public land.

C. The housing element should streamline affordable housing production.

D. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas.

E. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas currently zoned R1.

4. Site Capacity Assessment

A. The housing element should estimate and report both the likelihood of discontinuation and the realistic capacity of inventory sites, both vacant and nonvacant.

Comparison of claimed capacity vs. estimated realistic capacity

Income Category	Claimed Capacity in			Estimated Add'n Dev Potential in Draft HE (13% dev likelihood)	Recommended Add'n Dev Potential w/20% NNL	Gap in Add'n Dev Potential
	RHNA Target	Draft HE	NNL Buffer			
VLI + LI	1,444	1,648	14%	214	1,733	-1,519
MI	490	671	37%	87	588	-501
AMI	556	861	55%	112	667	-555
Total	2,490	3,180	28%	413	2,988	-2,575

We estimate that the draft housing element will fall short of the RHNA goal, by 2,575 units of realistic capacity. The City must *fairly* estimate the likelihood of development for all parcels on the suitable sites inventory.

B. The housing element should report the proportion of sites from the previous housing element's inventory that were developed during the previous planning period, and HCD-recommended methodologies and data sources should be used in order to conduct a thorough "factors" analysis of sites' realistic development capacity.

C. The housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, but should use statistical methods (e.g. surveying a random sample of owners of nonvacant sites) to determine that the sites' existing uses are likely to be discontinued during the planning period.

D. A buffer of at least 15-30% extra capacity should be included in the housing element site inventory. This capacity buffer is especially necessary in order to accommodate the lower-income RHNA target.

See No Net Loss (NNL) section of 3A.

E. The housing element should provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and should adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.

F. The housing element should commit to a mid-cycle review to verify the housing element's assumptions about development probabilities.

5. Affirmatively Furthering Fair Housing

A. The housing element should meaningfully increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is low.

B. The housing element should meaningfully reduce the concentration of lower-income households in areas with significant exposure to noise/pollution and commit to reducing/addressing noise and pollution.

C. The housing element should ensure community-serving investment in historically disinvested areas. This includes place-based strategies that create a net gain of affordable housing and stop displacement, prioritize environmental justice, enhance community health and strengthen equitable community leadership in land use planning.

D. The housing element should include a thorough analysis of local patterns in socioeconomic/racial segregation and integration, including patterns of overt racial or ethnic discrimination in the housing and land development market.

E. The housing element should adequately prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities.

F. The housing element should adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.

G. The jurisdiction should adequately solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction's socioeconomic makeup.

6. Forecasts of ADU Development

A. The housing element should use an HCD-recommended safe harbor methodology for forecasting future ADU production.

B. The housing element should provide for mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be large enough to make up for an ADU shortfall.

C. The housing element should assess the affordability of forecasted ADUs using city-specific data; it instead uses a regional average.

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

[Our Future LA](#)
[Steering Committee Members](#)

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD



September 15, 2021

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

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of Redondo Beach's general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding the 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law**'s mission is to make housing in California more accessible and affordable through enforcement of state housing law.

We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

In May 2021, [we submitted a comment letter](#) regarding Redondo Beach's draft housing element update. In the letter, we highlighted significant inconsistencies with state housing element law, including the requirement that housing element updates affirmatively further fair housing (AFFH), as well as inconsistencies with the State Department of Housing and Community Development (HCD)'s instructions regarding housing element design and implementation. Additionally, in October 2020, we shared [an outreach letter](#) and "[Requirements and Best Practices](#)" memo sharing general principles for high-quality housing element updates.

[HCD's recent comment letter](#) on the City's draft housing element update directly addresses many of the same deficiencies that our May letter highlighted, and also states that "revisions will be necessary to comply with State Housing Element Law."¹ We have provided a brief summary below (Exhibit A) illustrating how HCD's comments on the City's draft housing element are largely congruent with our previous analysis.

These deficiencies must be addressed in the final version of the housing element update. We urge the City to swiftly adopt a legally compliant housing element that accommodates the City's RHNA target and provides a variety of attainable housing options for the City's residents and workers.

Thank you for your time and consideration.

Sincerely,

¹ HCD, Review of the City of Redondo Beach's 6th Cycle (2021-2029) Draft Housing Element Update, 9/2/21, pg. 1

Leonora Camner
Executive Director
Abundant Housing LA

Sonja Trauss
Executive Director
YIMBY Law

CC: Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD

Exhibit A: Comparison of HCD Comment Letter and AHLA/YIMBY Law Comment Letter and Policy Recommendations

Deficiency	HCD Comment Letter Appendix	AHLA/YIMBY Law Comment Letter	AHLA/YIMBY Law Policy Recommendations
<p>Insufficient AFFH analysis and policy reforms to promote integrated neighborhoods</p>	<p>Page 1: “The comparison of segregation levels at the regional and local levels must be complemented by local knowledge and relevant factors supporting conclusions. For example, the analysis should incorporate local conditions such as community opposition to affordable housing, and the City’s land use and zoning laws.”</p> <p>Page 1: “The element must demonstrate the sites inventory 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...”</p> <p>Page 5: “Program 15 (Fair Housing Program) 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. The program must include specific timeframes for action and provide quantifiable description of actions to objectively measure for successful outcomes.”</p>	<p>Pages 4-5: “Planning’s intended approach to updating the housing element does not affirmatively further fair housing and reverse existing patterns of residential segregation. [...] The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.”</p> <p>Page 5: “In April 2021, HCD issued an AFFH Guidance Memo, which establishes a number of important principles for promoting fair housing, including [...] The distribution of housing-element inventory sites with lower or moderate income capacity must not be skewed toward lower-income neighborhoods. [...] The share of lower-income RHNA units assigned to tracts (or block groups) with a higher-than-average share of lower-income households should be less than the current share of lower-income households in those tracts.”</p> <p>Pages 5-6: “[The City’s] proposed site inventory, which does little to encourage housing growth, is therefore unlikely to advance the</p>	<p>Rezone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in high- and highest-resource areas, including R1 parcels where single-family detached homes are currently mandated by law.</p> <p>Do more to reduce the concentration of lower-income households in neighborhoods with high concentrations of low- and moderate-income households or with high exposure to pollution.</p> <p>Identify new funding sources and public resources to encourage the production and preservation of affordable housing, such as a real estate transfer tax, an introduction of congestion pricing, creation of a local density bonus program, and active abatement of unhealthy facilities, such as pumping stations, incinerators, and other polluting infrastructure.</p> <p>Exempt parcels containing rent-restricted and de facto affordable housing units from rezoning to prevent displacement of vulnerable households.</p>

		<p>goal of socioeconomic integration or greater housing affordability. Also, by proposing to accommodate the vast majority of the RHNA goal in the North Redondo block bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards, a location with significant exposure to freeway noise and pollution, and by deterring housing growth in South Redondo, where environmental quality is significantly better, the City risks perpetuating the concentration of lower-income households in areas with poor environmental quality.”</p>	<p>Ensure that “no net loss” provisions apply to parcels in the site inventory and rezoning program with an annual and ongoing monitoring and implementation program.</p> <p>Prioritize the production of affordable housing on publicly-owned land, and offer that land to nonprofit developers at no cost as a lawful and bona fide concession through state density bonus law.</p> <p>Create a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.</p>
<p>Poor site suitability and failure to analyze likelihood of discontinuation for nonvacant sites</p>	<p>Page 2: “...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. [...] The element includes only minimal analysis and description of the sites to establish their adequacy and concludes, “Existing conditions are ripe for redevelopment”. However, the sites include uses by large national business chains such as Vons, Baskin Robbins, and Super Cuts as well as a premier motorcycle dealership, a large plumbing business, and multiple locally owned restaurants. Additionally, the “triangle” area of the North Tech District appears to be an isolated location that is bordered on two sides by Lawndale and on</p>	<p>Page 2: “Per HCD guidelines, if a jurisdiction assigns more than 50% of its lower-income RHNA to nonvacant sites (a near-certain scenario for Redondo Beach), the jurisdiction must make findings supported by “substantial evidence” that the sites’ existing uses are “likely to be discontinued during the planning period.” But Planning failed to provide convincing evidence that redevelopment on the above sites is likely to happen.”</p> <p>Page 2: “...it is unlikely that the City’s rezoning plan will encourage meaningful housing growth. The City’s list of “critical Housing Element sites” includes: The block</p>	<p>Provide a quantitative estimate of parcels’ development probabilities, and incorporate this factor into the estimate of sites’ realistic capacity. Valid methodologies include the Survey Method or the Historical Redevelopment Rate Method.</p> <p>Report the proportion of sites in the previous housing element’s inventory that were developed during the planning period.</p> <p>Share letters from owners of the site inventory parcels, indicating their interest in selling or redeveloping these properties during the 6th Cycle. At a minimum, these letters would express interest, but, ideally,</p>

	<p>the third side by the 405 Freeway. 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.”</p> <p>Page 2: “The element demonstrates a shortfall of 1,258 sites to accommodate the City’s RHNA for lower-income housing and identifies multiple sites from the Preferred Land Use Plan anticipated to accommodate the shortfall (pending approval of the electorate). All sites accommodating a shortfall must meet the requirements of Government Code section 65583.2, subdivisions (h) and (i). One of these requirements is that each site must accommodate a minimum of 16 units. Several sites have capacity estimated under 16 units and do not meet this threshold.”</p> <p>Page 3: “...the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established.”</p>	<p>bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards. The City’s major employers are all located here, including Northrop Grumman (which provides 1/3 of all jobs in Redondo Beach, and which is the City’s largest employer), DHL, the Amazon distribution center, the Uber Greenlight facility, and a trio of new hotels. The City’s plan indicates that apartments will be built there as a result of rezoning.</p> <p>However, while it is a good idea to encourage housing near jobs and transit, this particular proposal is not credible for the simple reason that Northrop Grumman is very unlikely to vacate Space Park over the next 8 years.”</p> <p>Page 2: “The South Bay Galleria owners are in the process of building homes on the Galleria parcel. But under the City’s plan, no additional residential development on the Galleria site would be allowed. The City’s alternative is to allow apartments on the land surrounding the Galleria, which are currently occupied by strip malls, bungalows and industrial sites -- but those properties’ owners have shown no interest in residential redevelopment of these sites.”</p>	<p>letters would describe plans in sufficient detail as to allow the City to quantify such interest into a likelihood of development.</p> <p>If the City lacks enough suitable sites to achieve the RHNA target, rezone additional parcels where redevelopment is likely. Merely adding more theoretical units to existing multifamily does not fulfill the City’s duty to AFFH (see above).</p> <p>Commit to a mid-cycle review to verify Planning’s assumptions about development probabilities and make adjustments if necessary.</p> <p>Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly. If the City does not have these data, it should apply the same discount as the City of Los Angeles due to the close proximity and microeconomic conditions that exist there.</p>
Lack of	Page 3: “Since the element does not	Page 3-4: “...the City plans to	Create a high-quality local density

<p>concrete constraint removal and adequate rezoning program</p>	<p>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.”</p> <p>Page 4: “Existing parking requirements are a constraint to the development of all multifamily units, not just smaller units. Therefore, the program should be revised to amend the parking standards for all multifamily development, not just for a subset of smaller units.”</p> <p>Page 4: “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. The element currently demonstrates a shortfall of sites to accommodate its RHNA for lower-income households. The zoning actions required to provide sufficient adequate sites are contingent upon approval of the Preferred Land Use Plan by the electorate. The element should acknowledge that if the electorate rejects the ballot measure, the City must take additional action to retain housing element compliance.”</p> <p>Page 5: “The element describes typical fees for multifamily units to exceed typical fees for single-family units by over \$10,000 per unit. This is a potential constraint to multifamily development. The element should include a program to analyze why</p>	<p>reduce the amount of development in areas where housing pencils out. This isn’t just a bad idea - it also violates Government Code section 65863. Per HCD, “A jurisdiction may not take any action to reduce a parcel’s residential density unless it makes findings that the remaining sites identified in its Housing Element sites inventory can accommodate the jurisdiction’s remaining unmet RHNA by each income category, or if it identifies additional sites so that there is no net loss of residential unit capacity.” Downzoning is illegal unless the City can show that the additional capacity is made up for elsewhere. Here, it is not.”</p> <p>Page 6: “The City is already required to identify and remove constraints to housing production under Government Code section 65583. The City should commit to major constraint removal policies in order to encourage strong housing growth at all levels of income.”</p> <p>Pages 2-3: “The City overlooks large numbers of potential housing sites, including: the AES site (51 acres), the former South Bay Medical Center site (9.3 acres), beachside parking lots (24 acres), the Space Park and Aviation Park parking lots (62 acres), the Riviera Village parking lot (2 acres), and the west side of the Redondo Beach Transit</p>	<p>bonus program, which would also apply to low-density parcels where apartments are banned today.</p> <p>Pre-approve standard accessory dwelling unit (ADU), small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.</p> <p>Speed up the timeline for ministerial review, and expand ministerial review to apply to more projects.</p> <p>Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.</p> <p>Reduce restrictions on maximum height, floor-area ratio, unit size, setbacks, and lot coverage.</p> <p>Rezone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in high- and highest-resource areas, including R1 parcels where single-family detached homes are currently mandated by law.</p> <p>Reduce fees on multifamily residential development.</p>
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	<p>this occurs and include actions to mitigate the effects.”</p>	Center.	
<p>Insufficient public review</p>	<p>Page 6: “HCD understands the City made the element available to the public less than a week prior to its submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD’s ability to consider public comments during its review.”</p>	<p>Page 8, Supplemental Memo: “To overcome bias in patterns of public participation, jurisdictions should sample a random cross-section of the community (e.g., from voter or jury rolls), and elicit the respondents’ preferences and priorities regarding zoning and residential development. If response rates vary with demographic or geographic characteristics of respondents, the survey results should be reweighted accordingly so that they more accurately reflect the distribution of opinion within the community.”</p>	<p>Survey or poll a statistical sample of the community, and elicit the respondents’ preferences and priorities regarding zoning and residential development. If response rates favor privileged groups, the survey results should be reweighted accordingly so that they more accurately reflect the distribution of opinion within the community. Offer this survey mechanism in the top languages spoken in the City, in both online and hardcopy formats.</p>