

Written Public Comments 6th Cycle 2021-2029 Draft Housing Element

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life*

August 30, 2021

Mr. Sean Scully
Planning Manager
City of Redondo Beach
Community Development Department
415 Diamond Street
Redondo Beach, CA 90277

RE: City of Redondo Beach's 2021-2029
Housing Element
SCH # 2021080057
Vic. LA-01 & LA-405 Citywide
GTS # LA-2021-03676-ND

Dear Mr. Scully:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated NOP. The 2021-2029 Housing Element provides a framework for meeting the housing needs of existing and future resident populations within the City based on the Regional Housing Needs Allocation (RHNA) of 2,490 units within the City limits.

Housing Element identifies strategies and programs to conserve and improve existing affordable housing; provide adequate housing sites; assist in the development of affordable housing; remove governmental and other constraints to housing development; and promote equal housing opportunities in a strategic manner. The 2021-2029 Housing Element proposes additional residential densities within mixed-use designations, residential recycling, residential overlays in commercial and industrial zones, and residential development on religious properties through coordination with nonprofit organizations. Since this is a policy document, the land use designations and zoning amendments associated with the 2021-2029 Housing Element are not under consideration at this time.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying

transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-lidigr-safety-review-guidance-a11y.pdf>

Caltrans encourages lead agencies to prepare traffic safety impact analysis for all developments in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The development anticipated by the Housing Element would constitute infill development as it would occur primarily on underutilized properties within an urbanized area and would consist of various housing types. Additionally, many of the housing sites included within the Housing Element are strategically located in proximity to existing and planned Metro Transit Stations. Future development would be consistent with the City's Circulation Element, which addresses how local and regional traffic will circulate through the City under both existing and future conditions, as well as, addressing the needs of bicyclists, pedestrians, and transit and rail users.

The goals, policies and improvements in the City's Housing Element are also intended to take advantage of existing and future regional rail facilities and create an active street life that would enhance the vitality of businesses while reducing vehicle miles travelled (VMT); reduce traffic congestion while increasing pedestrian safety and welfare; and promote the use of public transit. Therefore, future development consistent with the Housing Element would be expected to generate fewer VMT and more multi-modal trips than conventional development.

For the planning benefits of the City, we recommend the City to disclose existing VMT for the housing element and City's threshold to identify potential CEQA impact. The OPR generalized recommendation is a 15% reduction below the existing VMT as a threshold for CEQA significance. This VMT analysis would provide substantial evidence whether future development would contribute any significant traffic impact. The result would assist the City in mitigating future traffic impact in the planning stage such as identifying effective TDM for the new development or implementing any traffic impact fee program.

Mr. Sean Scully
August 30, 2021
Page 4 of 4

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03676-ND.

Sincerely,

Frances Duong for

MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse

Lina Portolese

From: Therese Mufic Neustaedter (via Google Docs)
Sent: Monday, April 12, 2021 10:27 PM
To: Mendoza, Kathyren@HCD
Cc: gspeng.lvv@gmail.com; Compliance Review@HCD
Subject: Copy of RB Housing Element Comment GSP
Attachments: Copy of RB Housing Element Comment GSP.pdf

[tmufic](#) has attached the following document:



Copy of RB Housing Element Comment GSP



I believe that Redondo Beach is gaming the Housing Element Update. They downzoned the southern white part of town and added the homes all to the less wealthy and white northern end of town. Then they put housing overlays on the industrial area next to the freeway or sandwiched between 3 busy arterials: From Grace Peng. Please let me know if you have any trouble with this file and i will re-send it. Thanks you -- Teri Neustaedter 913 568 5466 tmufic@gmail.com

Google Docs: Create and edit documents online.

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because [tmufic](#) shared a document with you from Google Docs.



[\[drive.google.com\]](https://drive.google.com)

April 10, 2021

Honorable Bill Brand
Mayor, Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

Re: Housing Element

Dear Mayor Brand, City Council Members and Planning Staff,

I am writing to you to express my alarm about the [draft Housing Element](#) (HE) presented on April 7, 2021. I fear that the CA Dept of Housing and Community Development (HCD) will reject it & we will be mired in costly and time-consuming litigation and conflict with Sacramento. The draft HE does not meet the requirements of Affirmatively Furthering Fair Housing (AFFH) and produces Disparate Impacts. I would like to offer some alternatives.

I attended GPAC meetings in both Redondo Beach and Culver City to compare different approaches. I find it very odd that RB did not examine its past history to understand how we got here and to inform our decisions moving forward as Culver City did. I also find it puzzling that GPAC members felt blindsided by rules that they had only heard about in December 2020. The rules have changed since the last (fifth) RHNA cycle, but the changes were publicly available to anyone who cared to look them up.

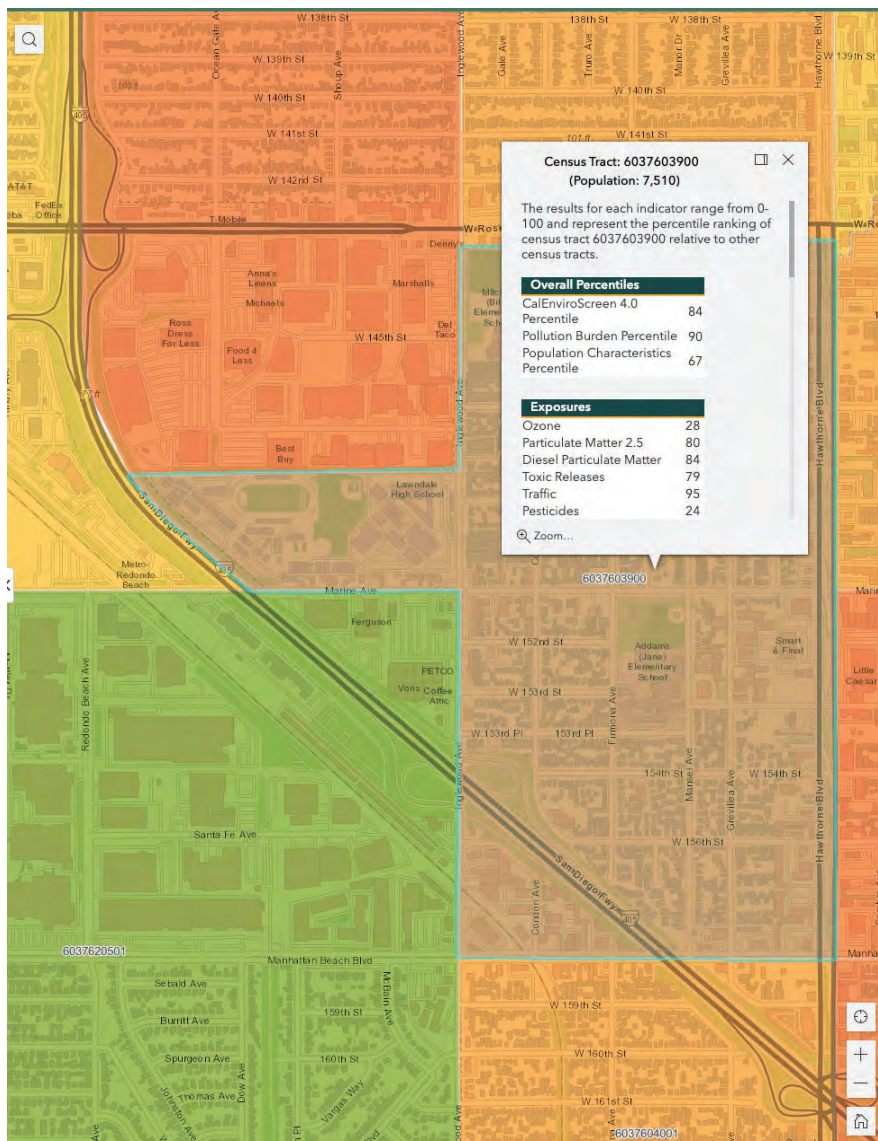
California and Federal Fair Housing and Disparate Impacts laws were settled well before 2020. The US Supreme Court ruled on Disparate Impacts in 2015, and HUD has provided guidance to cities repeatedly, including [this plain English summary](#) published in September 2020¹. Likewise, California's HCD published the [Housing Element Site Inventory Guidebook](#)² in June 2020. The [SCAG RHNA subcommittee](#) held many meetings throughout 2018-2019 to craft an equitable, sustainable and legal allocation methodology. Redondo Beach's final sixth RHNA allocation is not substantially different from the [published draft allocations](#) that have been available from their website throughout 2019-2020.

I want to point out that North Redondo Beach is famous for our role in the US Space Program from WWII through the Cold War to today, where billions carry phones with GPS receivers. GPS, a system that has become commonplace infrastructure, was born in our city. The environmental satellites that monitor weather and climate for our planet are made right here. We should be proud of, and carefully safeguard, [this important industry and economic engine](#) for our city. Preserve ample space for the industry at our existing and globally-famous hub for Space Innovation. Do not put a housing overlay on a growth industry and our biggest generator of high-income jobs.

¹ HUD Issues Final Rule on the Fair Housing Act's Disparate Impact Standard

² Housing Element Site Inventory Guidebook Government Code Section 65583.2

GPAC says the draft Housing Element was guided by Environmental Justice, which is required by HCD. I explored [CalEnviroScreen](#) data (both version 3.0 & 4.0) and used their interactive maps. A high score and high percentile is bad; a low score is good. Putting housing in the NE corner (bounded by Inglewood, Marine, Redondo Beach Ave, Manhattan Beach Ave) of our city, next to the 405 freeway and its ramps would kettle residents from the rest of the city and have devastating impacts on future residents, especially young children. Census tract 6205.01 enjoys a relatively moderate Pollution Burden in the 72nd percentile because it is averaged over an area that extends south to Anderson Park and west to Aviation Blvd. However, the Pollution Burden of the housing overlay would be closer to the 90th percentile of census tract 6039.00 (NW Lawndale) which surrounds it on 2 sides.



This picture is purely for orientation purposes. The pop-up shows the EnviroScore data for Lawndale census tract 6039.00. You can see the details much more clearly on the table in Appendix A.

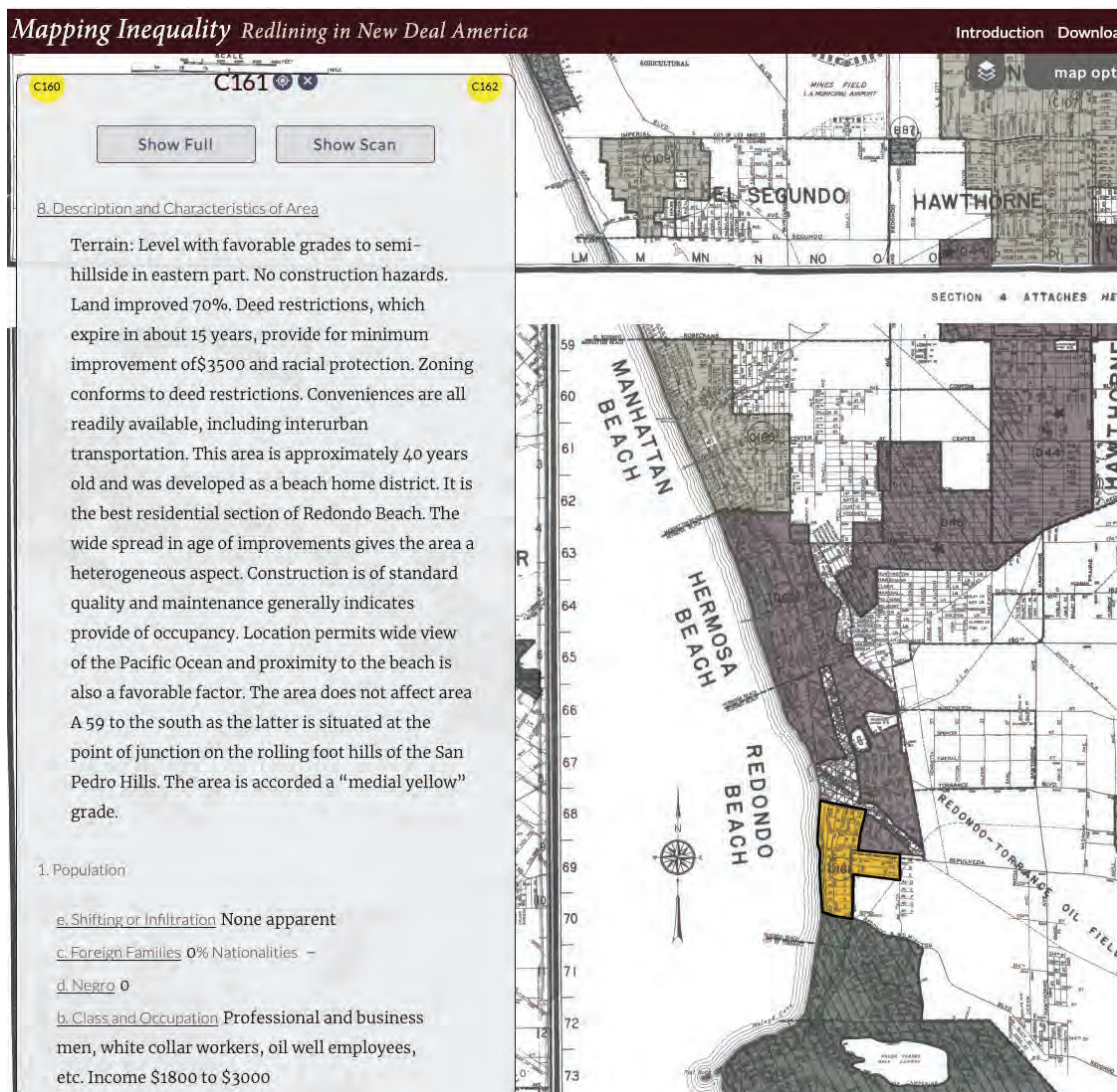
The Housing Overlay in the NE corner of RB (6205.01) is surrounded by 6039.00 and the I-405 freeway. It's true pollution burden is expected to be at least as high as 6039.00's.

It only looks lower in reporting because 6205.01 averages over a large area away from the freeway and closer to the ocean.

In 2017, [AB 1397](#) gave HCD the power to take into account expected yield of homes that could be built on a site in 8 years. It is unlikely (and not desirable!) that Northrop Grumman would vacate Space Park to enable housing production. HCD is likely to look unkindly on this overlay.

HCD may use “expected yield” of this site and then assign the city a much higher housing target to reflect the expected low yield. Let’s not invite this level of scrutiny and punishment.

Affirmatively Furthering Fair Housing (AFFH) requires us to locate housing to reduce racial and economic segregation. Newcomers are more diverse than existing SRB residents. Redondo Beach still bears the marks of [20th century racist zoning and lending practices](#)³ that reserved the southern beachfront section for whites only. The harbor area was rated median red while the northern part of the city, which is zoned for R2/R3, was rated low red and not eligible for home loans. Infill and displacement has disproportionately impacted North RB.

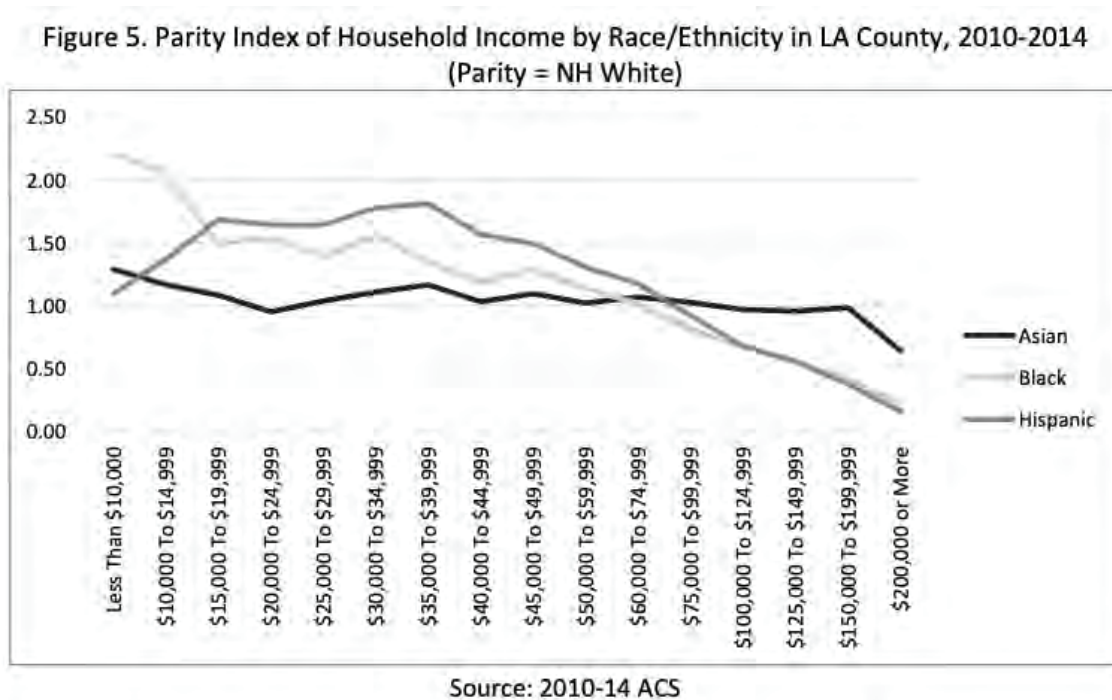


In the century since this map was published, Riviera Village has slowly evolved from 100% nonhispanic white to 75%, compared to 47-62% in North RB and 26.1% for LA County overall.

³ Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=13/33.863/-118.403&city=los-angeles-ca&area=C161>

It's no accident that Redondo Beach's most integrated census tracts line the Artesia corridor, which saw the most infill home production. Single Family Home (SFH/R1) areas also endure construction, but yield only much larger homes, not additional ones. At a minimum, we should upzone historically exclusionary areas that swapped whites-only covenants for SFH zoning. Our RHNA targets are so high, we should upzone all R1⁴ within the city to R2 or R3, and give incentives to combine lots so we can build even more densely.

SCAG's RHNA allocation methodology assigned RB a higher than average low and very low income housing allocation because our city has far below average numbers of VLI/LI units. Additionally, Very Low and Low Income (VLI/LI) residents are [disproportionately people of color](#)⁵. Given HCD's determination that they will only accept parcels larger than 0.5 acres & zoned > 30 homes/acre, we can only meet the VLI/LI requirement by using every possible parcel of our city, including enticements for combining lots.

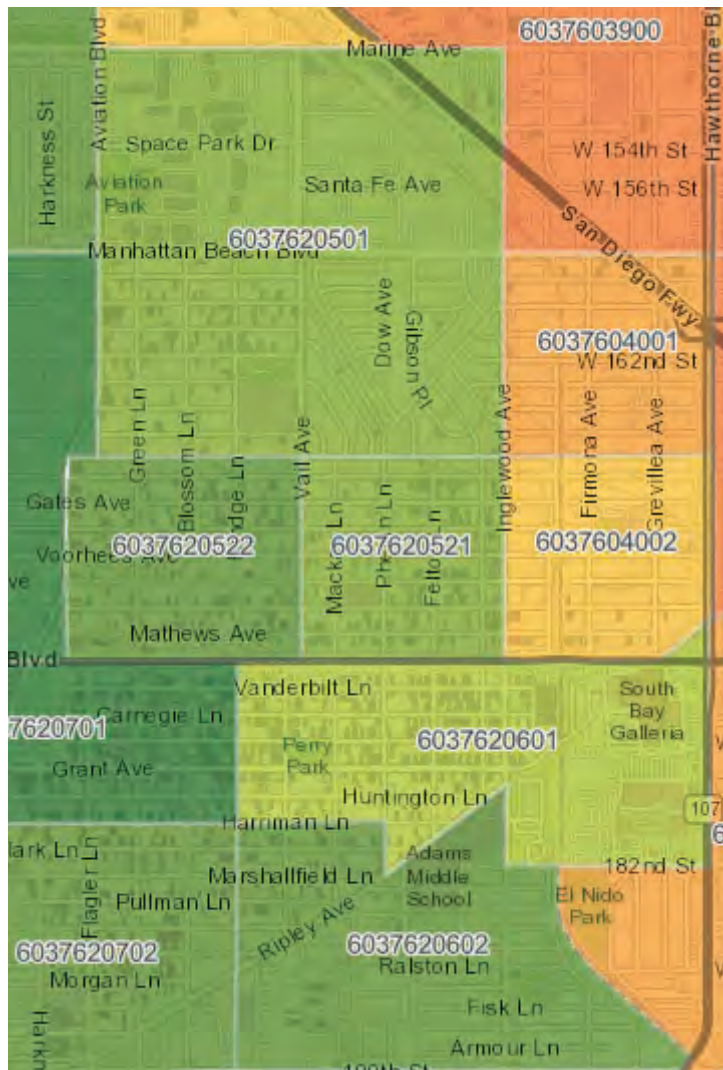


Furthermore, it is extremely challenging to finance VLI/LI homes so that they “pencil out” in an era with low public spending on housing subsidies. The federal government looks like they are willing to provide help. But, we can also make our own luck by using what we’ve got, which is extremely high rents in SRB. A [USC study found that high rent areas](#) are able to profitably support a higher percentage of inclusionary (subsidized) units than moderate rent ones⁶.

⁴ Excluding the already dense R1 small lots currently zoned in census tracts 6207.01 & 6207.02.

⁵ Race Ethnicity and Income Segregation in Los Angeles, by Paul Ong, Chhandara Pech, Jenny Chhea, C. Aujean Lee, UCLA Center for Neighborhood Knowledge, June 24, 2016, https://knowledge.luskin.ucla.edu/wp-content/uploads/2018/01/Race-Ethnicity-and-Income-Segregation-Ziman_2016.pdf

⁶ Los Angeles' Housing Crisis and Local Planning Responses: An Evaluation of Inclusionary Zoning and the TransitOriented Communities Plan as Policy Solutions in Los Angeles, Linna Zhu, Evgeny Burinskiy,



The draft plan puts all new dense housing in the corner of census tract 6205.01 next to the freeway and on the eastern edge of 6206.01 between extremely busy Hawthorne and Artesia Blvds and Inglewood Ave, another arterial. Students living in the proposed housing sites will have to cross train tracks and at least one arterial to reach elementary schools. This creates disparate pollution and traffic impacts on newer, poorer and less white residents.

Those areas also feed into the schools (Adams, Madison and Washington) with the highest concentration of low income and Title I students in our city's school district. These schools also suffer disproportionately from overcrowding than schools in wealthier parts of RB bypassed for new housing in the draft HE, another disparate impact.

The city owns a large surface parking lot in (75% nonhispanic white) Riviera Village & should build housing above the parking. RV is ideal for mixed use because most of it is not next to busy arterials and children do not have to cross one to reach an elementary school. RB can give inducements to private property owners in the RV to combine lots & build mixed use.

Reducing segregation would benefit the children of South RB. Each year, Adams (North) and Parras (South) Middle School's rising RUHS Freshman attend a meet and greet "Field Day". My daughter and her friends reported bullying from the Parras children. She said that a PMS student told her, "You don't seem ghetto" and thought that was a compliment.

The AES power plant in 6212.04 is slated to close shortly. The only reason that area has a middling 45-50 pollution burden percentile is because of AES's pollution. After closure and

remediation, the site's pollution burden is expected to be drastically reduced. A CalEnviroScore in the cleanest decile is probable. The proximity to the beach also means it will command the highest rents. Combined with the size of the parcel, it should be able to fit & "pencil out" the highest number of VLI/LI units in the city.

There is an environmental justice component to repurposing the AES site, which hosted an early power plant to light the whites-only resort of South RB. It used so much water for cooling that it caused seawater intrusion into wells used by inland communities of color. That led to early adjudication of ground-water pumping in the LA Basin and the use of seawater for cooling, which is also ecologically damaging.

11% of Los Angeles County Households do not own any cars. Half of LA Co HHs own 0 or 1 cars. Putting a car-light mixed-income community at AES would heal the environmental and psychic damage wrought by the power plant.

School	Zip Code	Student Pop	% Low Income	% White	% Hispanic	% Black	% Asian	% 2 or more
RUHS		3040	18	46	24	5	8	15
Adams MS	90278	1066	24	39	29	5	9	14
Parras MS	90277	1257	13	54	19	3	7	15
Tulita	90277	474	14	53	20	1	9	14
Alta Vista	90277	647	11	48	21	3	13	13
Beryl Heights	90277	458	15	55	18	2	7	17
Jefferson	90278	612	5	50	15	1	15	17
Birney	90278	457	14	43	24	2	12	18
Washington	90278	801	19	32	39	2	12	12
Madison	90278	488	22	34	29	5	13	15
Lincoln	90278	651	11	46	19	3	15	16

Kettling VLI/LI residents in a corner cut off from the rest of the city by freeways, arterials and train tracks is not AFFH and creates Disparate Impacts. There are better ways and the ideas outlined here are just a start. We can't change our past and shameful history of deliberate segregation, but we can do better in the future. It starts with better and more equitable zoning today.

Grace Peng, PhD
6205.22 Resident

Appendix A: [CalEnviroScreen 4.0](#) data for Redondo Beach with Lawndale and LA County data for context. Population figures from US Census Bureau's 2018 American Community Survey

Census Tract	Total Population	Area Description	DRAFT CES 4.0 Percentile	Pollution Burden Pctl	Asthma Pctl	Cardiovascular Disease Pctl	Hispanic (%)	White (%)	African American (%)	Native American (%)	Asian American (%)	Pacific Islander (%)	Other/Multi-racial (%)
603900	7510	NW Lawndale	83.90	90.06	71.37	62.60	66.2	13.1	7.5	0.0	10.9	0.2	2.0
620501	6063	TRW, Anderson	27.91	72.08	17.93	28.45	20.1	55.8	4.8	1.0	10.6	0.2	7.4
620521	4092	Artesia NE	25.52	27.95	21.98	21.21	14.5	51.4	2.8	0.0	17.8	0.5	13.0
620522	4968	Artesia NW	11.26	29.84	21.83	36.86	17.3	52.6	2.7	0.0	14.9	0.0	12.5
620601	5030	Galleria	35.85	50.32	23.90	40.83	26.0	46.6	3.3	0.0	16.6	0.0	7.4
620602	5165	Adams	17.68	63.36	12.65	19.07	23.6	59.3	0.0	0.2	13.5	0.0	3.3
620701	7184	Artesia SW	9.02	41.42	12.52	20.78	13.3	63.3	5.7	0.9	11.1	0.0	5.6
620702	7391	Jefferson	17.35	41.12	21.37	35.90	14.0	62.3	2.6	0.0	15.5	0.2	5.4
621201	6601	RUHS	12.08	52.22	5.11	9.00	25.7	57.4	0.7	0.5	11.2	0.0	4.4
621204	3142	AES	31.13	44.95	7.33	17.34	11.7	66.2	4.6	0.0	13.6	0.4	3.5
621301	6819	Alta Vista	15.70	33.15	9.55	23.13	11.5	64.8	3.6	0.0	13.9	0.0	6.3
621324	3804	Veterans Park	13.22	27.97	9.67	23.82	20.6	65.6	1.4	0.0	9.1	0.0	3.3
621326	2945	Riviera Village	9.94	23.43	9.67	23.82	13.6	75.0	1.5	0.0	5.6	0.0	4.3
621400	4496	SE PCH	7.05	37.26	6.18	13.91	12.1	71.2	2.5	0.0	9.5	0.0	4.7
LA County	10,039,107	LAC Average					48.6	26.1	9.0	1.4	15.4	0.4	3.1

Lina Portolese

From: Coy, Melinda@HCD
Sent: Thursday, May 20, 2021 5:33 PM
To: Mendoza, Kathyren@HCD
Subject: FW: Redondo Beach Housing Element - Comment Letter

Can you pdf their letter and store in the public comments folder for the review?

From: Anthony Dedousis <anthony@abundanthousingla.org>
Sent: Thursday, May 20, 2021 4:08 PM
To: Kirkeby, Megan@HCD <Megan.Kirkeby@hcd.ca.gov>; Coy, Melinda@HCD <Melinda.Coy@hcd.ca.gov>; McDougall, Paul@HCD <Paul.McDougall@hcd.ca.gov>; Buckley, Tyrone@HCD <Tyrone.Buckley@hcd.ca.gov>
Cc: Leonora Camner <leonora@abundanthousingla.org>; Compliance Review@HCD <compliancereview@hcd.ca.gov>; Velasquez, Gustavo@HCD <Gustavo.Velasquez@hcd.ca.gov>; Jon Wizard <jon@yimbylaw.org>; Jes McBride <jes@yimbylaw.org>; Sonja Trauss <sonja@yimbylaw.org>
Subject: Redondo Beach Housing Element - Comment Letter

Hi Melinda, Megan, Tyrone, and Paul,

Hope your week is going well. I'm reaching out to [share a letter \[drive.google.com\]](https://drive.google.com) from Abundant Housing LA and YIMBY Law regarding Redondo Beach's draft housing element. As you will see, our letter expresses major concerns about the City's intended approach to updating the housing element. We believe that the City's intended approach does not satisfy the intent of state law, which is to expand housing availability at all income levels.

The attached letter contains a detailed explanation of where we view Redondo Beach as having fallen short of HCD's standards and state law. We respectfully request the opportunity to discuss the issues raised in this letter with your team. Thank you for your consideration.

Regards,

Anthony

--

Anthony Dedousis
Director, Policy and Research
Abundant Housing LA
515 S Flower Street, 18th Floor
Los Angeles, CA 90071
516-660-7402



May 20, 2021

Mr. Gustavo Velasquez
Director, California Department of Housing & Community Development
2020 West El Camino Avenue, Suite 500
Sacramento, CA 95833

Dear Director Velasquez,

We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding Redondo Beach's 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 October 2020, AHLA [shared a letter](#) with the Redondo Beach City Council and Planning Department, providing guidance on how the City should fulfill both the letter and the spirit of housing element law. We have reviewed the City of Redondo Beach Planning Commission staff report regarding the General Plan Advisory Committee's proposed changes to the City's General Plan, **and we have major concerns about the City's willingness and ability to meet its state-mandated RHNA target of 2,490 homes by 2029.** The staff report and draft site inventory are inconsistent with HCD's instructions and the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686.

We are especially concerned that the City has failed to identify enough sites where the RHNA housing growth goal can be accommodated by 2029.

The City, by its own admission, considers that only 64 units per year (i.e., one-fifth of the legally required RHNA allocation) is sufficient to meet the City's housing demand and population growth for the next two decades.¹ The City also intended to reduce the City's zoned capacity by at least 1,600 units before Senate Bill 166 (2017) banned this form of downzoning.² Given this history, it is not surprising that the proposed General Plan revisions appear designed to encourage relatively little new housing.

The City's approach fails on three counts:

1. The City proposes new housing in locations where it is highly unlikely to be built.
2. The City does not encourage new housing in locations where it is likely to be built.

¹ Admin Report, p. 61.

² April 15, 2021 Planning Commission presentation, p.19.

3. The City bans new mixed-use development in locations where it has successfully been built in recent years.

First: it is unlikely that the City's rezoning plan will encourage meaningful housing growth. The City's list of "critical Housing Element sites" includes:³

- **The block 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.⁴ The City's plan indicates that apartments will be built there as a result of rezoning.
 - 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.** Perhaps acknowledging this reality, the City's presentation states that it would defer to Northrop Grumman's wishes if any housing were proposed for the site, whatever those wishes might be.⁵
- **The Galleria District, excluding the Galleria itself.** 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.

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."⁶ But Planning failed to provide convincing evidence that redevelopment on the above sites is likely to happen.

Second: the City overlooks large numbers of potential housing sites, including:

- **The AES site (51 acres).** The new owner proposes to use the land for offices, hotel space and retail, with no residential component.⁷ The land is currently zoned industrial, and the City Council would have to rezone that land to accommodate commercial use in any case. This is a golden opportunity to build lots of housing in one of Redondo Beach's most desirable areas. If the whole site were built out at ~55 units per acre (i.e., the City of Los Angeles's R3 density), nearly all of Redondo Beach's RHNA allocation could be met in one fell swoop.

³ Admin Report, p. 72.

⁴ <https://www.redondo.org/civicax/filebank/blobdload.aspx?BlobID=39015>

⁵ April 15th, 2021 Planning Commission presentation, p. 48

⁶ Gov't Code 65583.2(g)(2), also [HCD Site Inventory Guidebook, pg. 26-28](#)

⁷ <https://www.dailybreeze.com/2020/03/30/aes-redondo-beach-power-plant-finalizes-sale-to-private-developer/>

- **The former South Bay Medical Center site (9.3 acres).** This site is currently being used for ordinary medical offices and is owned by the Beach Cities Health District, with vast, lightly-used parking lots which would be suitable for construction of housing. The entire parcel is 9.3 acres; if redeveloped at 55 units per acre (Los Angeles R3 density) that site alone could accommodate 20% of Redondo Beach's RHNA allocation. Although the site is currently being redeveloped, it has capacity for additional housing. The current plans for senior housing have already been scaled down by nearly 50% from the original size, with acres of surface parking to be retained.⁸
- **Beachside parking lots (24 acres).** The City has large amounts of extremely valuable beachside acreage zoned Coastal Commercial. At least 24 acres is currently used for surface parking lots.⁹ Recent sales, pre-COVID, suggest that Redondo Beach buildings near the beach sell for ~\$670 per square foot.¹⁰ These are higher prices than South Beach, Miami, which is world-famous for its high-rises.¹¹ This valuation suggests that large-scale construction, similar to Marina Del Rey, would be economically feasible in these locations.
- **The Space Park and Aviation Park parking lots (62 acres).** Between Marine, Redondo Beach Ave., Manhattan Beach Bl., and Aviation is the Northrop Grumman campus, a ten-minute walk from the Green Line station. The campus is surrounded by 62 acres of parking lots that are close to jobs, transit, and parks, making them a good location for more housing. In Northern California, Google and Facebook have invested in housing construction; perhaps a similar partnership arrangement could be reached with Northrop Grumman.
- **The Riviera Village parking lot (2 acres).** The City owns a 2-acre triangular surface parking lot in Riviera Village that sits at the center of a bustling neighborhood. On this site, another 60 units could be built at the Mullin density, or 215 units at Los Angeles's R4 density.
- **The west side of the Redondo Beach Transit Center.** It is a best practice to build apartment buildings near mass transit, and the City has planned to build a transit center at 1521 Kingsdale Ave., behind the South Bay Galleria, for over a decade.¹² Metro's baseline option for extending the Green Line to Torrance includes a station at this location.¹³ Yet the City's plan maintains the current low-density zoning on the west side of the station. Apartment buildings at the maximum legal density should be allowed on all parcels within a half-mile of the station.

Third: the City plans to reduce the amount of development in areas where housing pencils out. This isn't just a bad idea - it also violates Government Code section 65863.¹⁴ 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

⁸ <https://urbanize.city/la/post/new-look-370-million-beach-cities-health-district-campus>

⁹ This includes, for example, APN 7505-002-908, 7503-029-900, 7503-033-903, 7503-008-901, 7503-008-902, and 7503-003-900.

¹⁰ E.g., https://www.zillow.com/homedetails/414-N-Broadway-Redondo-Beach-CA-90277/21317652_zpid/

¹¹ <https://www.redfin.com/city/11467/FL/Miami-Beach/housing-market>

¹² <https://www.dailybreeze.com/2009/09/03/redondo-beach-approves-plans-for-new-transit-center/>

¹³ <https://urbanize.city/la/post/more-details-emerge-south-bay-metro-rail-extension>

¹⁴ This is also known as SB166 (2017).

identifies additional sites so that there is no net loss of residential unit capacity.”¹⁵ Downzoning is illegal unless the City can show that the additional capacity is made up for elsewhere. Here, it is not.

Parcels proposed for downzoning include:

- **The South Bay Galleria.** The City has approved 300 apartments, 175,000 square feet of office space, and a hotel, on the block bounded by Kingsdale, Hawthorne, 177th and Artesia.¹⁶ By proposing to downzone that parcel, the City has effectively eliminated any possibility of more housing being built on the site if the current redevelopment succeeds. Allowing more housing on the site makes perfect sense: the Torrance extension of the Green Line will stop at the Galleria, and the area is served by a half-dozen bus lines.¹⁷ In spite of this, the City proposes to eliminate the mixed-use designation, making further residential development impossible. Tellingly, the Galleria’s owners are already building housing on the site, suggesting that more homes might be built in the future. The upzoning of the surrounding parcels, ostensibly to satisfy No Net Loss, does little to improve the situation, because none of those landowners have shown any interest in building housing.
- **Pacific Coast Highway.** Along PCH, the City has battled the developers of One South (1920 S. Pacific Coast Highway) and Legado Redondo (1700 S. Pacific Coast Highway) to downsize the new buildings, going so far as to impose a moratorium on new mixed-use development in 2017.¹⁸ Perhaps having observed that new mixed-use development along PCH is feasible, the City would deter further development by banning new mixed-use development along PCH and moving the housing overlay a mile to the north.
- **Artesia Boulevard.** Here, the Montecito (2001 Artesia Bl., built 2008) and Aviation Villas (1733 Aviation Bl., built 2005) are examples of relatively new housing construction in this area. The City proposes to ban new apartment buildings along Artesia. To replace this capacity, the City plans to redevelop two commercial plots along 190th, at Mary Anne and Meyer. Given a clear indication that developers want to build apartments along Artesia, it is troubling that the City wouldn’t encourage housing on 190th **and** on Artesia.

In short, the City’s plan is: (i) plan for houses where they will not be built, (ii) leave the city’s underutilized land as-is, and (iii) ban new apartments in places where they have been built recently.¹⁹ **This is a plan for failure.**

Additionally, **Planning’s intended approach to updating the housing element does not affirmatively further fair housing and reverse existing patterns of residential segregation.**

AB 686 (2018) requires housing element updates to “affirmatively further fair housing”, which is defined as “taking meaningful actions, in addition to combating discrimination, that overcome

¹⁵<https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb-166-final.pdf>

¹⁶ <https://www.redondo.org/civicax/filebank/blobdload.aspx?BlobID=36759>

¹⁷ <http://media.metro.net/2020/GLExt-to-Torrance-Eng-map.pdf>

¹⁸ <https://urbanize.city/la/post/one-south-condos-near-completion-redondo-beach> and <https://urbanize.city/la/post/site-prep-starting-rare-mixed-use-development-redondo-beach>

¹⁹ Admin. Report, p. 67.

patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” **The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.**

In April 2021, HCD issued an [AFFH Guidance Memo](#), which establishes a number of important principles for promoting fair housing, including:

- A city’s AFFH analysis should reveal “current and historical spatial patterns of subsidized housing within and surrounding the jurisdiction, including emergency shelters, subsidized affordable housing, supportive housing, and usage of housing choice vouchers.”²⁰
- The distribution of housing-element inventory sites with lower or moderate income capacity must not be skewed toward lower-income neighborhoods. To demonstrate that the site inventory furthers fair housing, the city must calculate the percentage of households at lower, moderate, and above-moderate income levels in each census tract or “block group” in the city, and then do the same for the lower, moderate, and above-moderate-income RHNA units assigned to the tract or block group. 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.²¹
- The housing element must benchmark the citywide distribution of household incomes against the distribution in the county or region, and state. The AFFH program of a predominantly high-income city, like Redondo Beach, must break down barriers that keep lower income and minority households from accessing housing in the city.²²
- “Goals, policies, and actions” to further fair housing must be “aggressively set to overcome ... contributing factors [to fair housing problems, and thus] to meet the ‘meaningful impact’ requirement in statute.” AFFH Guidance Memo, p. 52. The list of actions shall include concrete timeframes for implementation, measurable outcomes, explicit prioritization (“high,” “medium,” or “low”), and “must be created with the intention to have a significant impact, well beyond a continuation of past actions.”²³
- “The schedule of actions generally must” (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places.²⁴

However, the City has not presented satisfactory evidence on any of the above points. Its proposed site inventory, which does little to encourage housing growth, is therefore unlikely to advance the 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

²⁰ AFFH Guidance Memo, p. 46

²¹ AFFH Guidance Memo, p. 47

²² AFFH Guidance Memo, pp. 15, 32-34, 77

²³ AFFH Guidance Memo pp. 52, 71

²⁴ AFFH Guidance Memo, p. 54

South Redondo, where environmental quality is significantly better, the City risks perpetuating the concentration of lower-income households in areas with poor environmental quality.

Redondo Beach can do better. 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, including:

- Legalizing apartments and rowhouses on all residentially-zoned parcels in the City, including R1 parcels where single-family detached homes are required by law.
- Significant upzoning of parcels located near transit, job centers, schools, and parks in order to expand the supply of housing.
- Legalizing by-right residential and mixed-use development on commercially-zoned parcels.
- Pre-approval of standard 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.
- Introducing a density bonus program similar to Los Angeles’s Transit Oriented Communities program to permit additional affordable housing to be built near mass transit.²⁵
- Establishing a small lot subdivision program similar to the City of Los Angeles to provide for flexible neighborhood-scale development.²⁶
- Establishing a fast ministerial review process to approve new multifamily buildings. Sacramento has adopted a citywide ordinance which provides for 60-day approval of projects with 150 units or less, and 90-day approval for projects with 151-200 units.²⁷ Santa Monica has also adopted a ministerial review ordinance, and the time to approve new housing has dropped by 75%.
- Citywide elimination of on-site minimum parking mandates, which drive up the cost of housing production and reinforce car dependency.
- More flexibility on height, floor-area ratio, and lot coverage.

The City of Redondo Beach has a legal obligation to sufficiently plan to meet current and future residents’ housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. The issues that we’ve highlighted above suggest that the City is not on a path to fulfilling this legal obligation. We respectfully urge you to remind the City of its legal obligation to accommodate the RHNA goal by promoting a variety of attainable housing options for the residents and workers of Redondo Beach.

Thank you for your consideration.

²⁵ <https://planning.lacity.org/plans-policies/transit-oriented-communities-incentive-program>

²⁶ <https://www.laconservancy.org/small-lot-subdivision-ordinance>

²⁷ <https://www.cityofsacramento.org/Community-Development/Planning/Major-Projects/Ministerial-Housing>

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

Sonja Trauss
Executive Director
YIMBY Law

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom
Assemblymember David Chiu, California State Assembly
Senator Scott Wiener, California State Senate
Mayor Bill Brand, City of Redondo Beach
City Council, City of Redondo Beach
Joe Hoefgen, City Manager, City of Redondo Beach

Lina Portolese

From: Compliance Review@HCD
Sent: Tuesday, June 1, 2021 11:23 AM
To: Housing Elements@HCD
Cc: Mendoza, Kathyren@HCD
Subject: FW: Redondo Beach

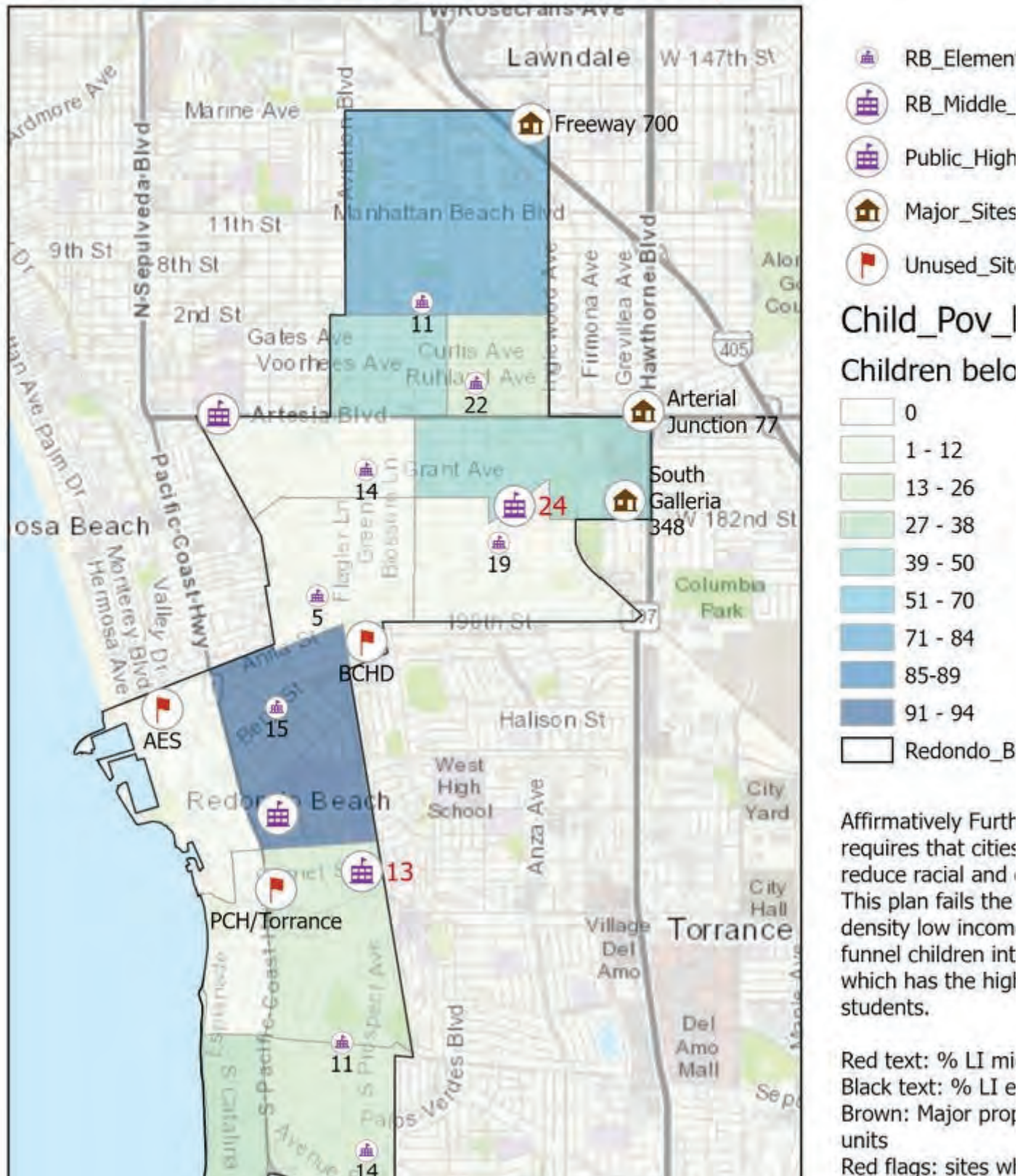
Third Party comments for Redondo beach

From: Jon Wizard <jon@yimbylaw.org>
Sent: Saturday, May 29, 2021 11:20 AM
To: Compliance Review@HCD <compliancereview@hcd.ca.gov>
Cc: Eleanor.Manzano@redondo.org; brandy.forbes@redondo.org
Subject: Redondo Beach

Hello,

Redondo Beach resident and third-party commenter Dr. Grace Peng created the following graphic that represents the city's current strategy for site selection in their housing element update. I understand they haven't yet submitted anything to HCD, but could you please see to it that the city's assigned reviewer sees this resource? Dr. Peng has been an active participant in the city's housing element discussions but a majority of the council has been unresponsive to her input thus far.

Redondo Beach Housing Element Update Concentrates Child Poverty



<https://pbs.twimg.com/media/E2iD7aFUcAAkEyp.jpg> [pbs.twimg.com]

Please also see this letter Dr. Peng wrote that includes other graphics and concerns about the city's progress toward a plan that affirmatively obstructs fair housing and perpetuates racially concentrated areas of affluence.

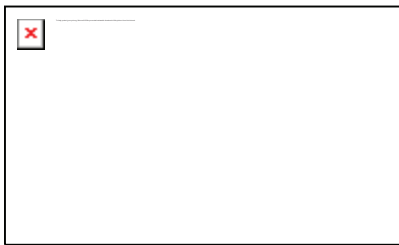
<https://abundanthousingla.org/whats-wrong-with-redondo-beachs-housing-element-open-letter/>
[abundanthousingla.org]

Thank you,

Jon

--

Jon Wizard
Policy Director he/him
Campaign for Fair Housing Elements



[fairhousingelements.org]

[YIMBY Law](#) [yimbylaw.org]

1390 Market Street
San Francisco, CA 94102

fairhousingelements.org [fairhousingelements.org]

Book a [15-minute](#) [calendly.com] or [30-minute](#) [calendly.com] meeting with me
calendly.com/housingelements [calendly.com] → housing element watchdogs calendar

From: [Maher, Bill @ South Bay](#)
To: [RBHousingElement](#)
Subject: Potential Site for Redondo's Future Housing Needs
Date: Friday, July 9, 2021 10:39:48 AM
Attachments: [306-312 S Catalina Avenue, Redondo Beach OM.pdf](#)



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

The owners of the property located at 306-312 S. Catalina Avenue would like to have their property considered for multi-family or mixed-use development.

Bill Maher | First Vice President
CBRE | Investment Properties | Office, Medical & Industrial
Property Sales throughout Southern California
2221 Rosecrans Avenue, Suite 100, El Segundo, California 90245
o 310 363 4929 | m 310 686 7255
bill.maher@cbre.com

California Department of Real Estate License Numbers
Bill Maher 01080990 | CBRE, Inc. 00409987

This message and any attachments may be privileged, confidential or proprietary. If you are not the intended recipient of this email or believe that you have received this correspondence in error, please contact the sender through the information provided above and permanently delete this message.

From: [Bob Pinzler](#)
To: [RBHousingElement](#)
Subject: Error on chart H-8
Date: Friday, July 9, 2021 10:58:33 AM



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

Percentage share of Married with children in 2019 should be 23% not 29%,

Bob

--

Bob Pinzler

From: [Barbara Epstein](#)
To: [RBHousingElement](#)
Cc: [CityClerk](#); [Bill Brand](#); [Todd Loewenstein](#); [Nils Nehrenheim](#); [Zein Obagi](#); [Brandy Forbes](#)
Subject: Draft Housing Element Comment
Date: Sunday, July 11, 2021 12:55:15 PM

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

Please forward my comments to the Planning Commission and GPAC.

Thank you so much for your hard work on this Housing Element.

My hope is that this planning process will be protected from special commercial interests and ill-conceived state government requirements.

To me, the most important thing to include, in all planning, is the “greening up” of Redondo. Over the planning history of our city, past city governments have catered to special developer interests, leaving inadequate front yard, side yard, and backyard setbacks on residential lots. These harmful zoning decisions need to change. This policy has left no space for beneficial trees and other plants that help capture carbon and water, beautify neighborhoods, provide oxygen, and cool the atmosphere throughout the city.

Requiring ample green space and trees as part of every residential building permit will help to remedy the planning mistakes of the past.

Requiring green parkland as a condition of issuing building permits will go a long way to improve air quality and quality of life in Redondo.

One example that comes to mind of good planning is the long-awaited development on Catalina between Diamond and Emerald streets. Preserving the cafe and adding the bakery is brilliant. The design is pleasant, though presently over-crowded. Including generous access and parking is essential. Adding shade trees and green space may reduce the building density a bit, but will go a long way to improve the essential value of the project to the community and for future residents. I am suggesting using native tree and plant species to encourage native bird, pollinating insects, and other species to make themselves at home and thrive.

Please do not hesitate to contact the South Bay Parkland Conservancy for information.
southbayparks.org

Thank you again for all you do and for keeping me posted.

Our city still has a chance, with your help.

Barbara Epstein
230 The Village #305
Redondo Beach, 90277
justbarb56@gmail.com

Sent from my iPad

From: [Nancy Skiba](#)
To: [Planredondo](#)
Subject: Affordable housing for 90277 and 90278 should be equally planned.
Date: Monday, July 26, 2021 7:12:52 PM



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

South Redondo should not be immune to the forced addition of units, while North Redondo gets the full brunt. Come on, man !

~ Nancy Skiba, District 4

Sent from [Mail](#) for Windows 10

From: [Mark Nelson \(Home Gmail\)](#)
To: [Planning Redondo](#)
Subject: CEQA Comment on DRAFT 2021-2029 HOUSING ELEMENT: (1) NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION; (2) NOTICE OF PUBLIC HEARING BEFORE THE PLANNING COMMISSION OF THE CITY OF REDONDO BEACH
Date: Friday, August 6, 2021 4:14:09 PM



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

The City's published document states " Since this is a policy document, the land use designations and zoning amendments associated with the 2021-2029 Housing Element are not under consideration at this time and the amendments will be processed as part of the City's ongoing and separate update to the Land Use Element of the General Plan (PLANRedondo)."

As such, please place the PLANRedondo CEQA document in to the public record in order that we can comment on the totality of land use designations and zoning amendments. Attempting to execute land use designations and zoning changes one at a time would constitute piecemealing under CEQA, since the policy document and the PLANRedondo document both envision multiple changes.

From: [Laura Emdee](#)
To: [RBHousingElement](#)
Subject: Draft Housing Element Comment
Date: Monday, August 23, 2021 11:56:23 AM

If the Housing Element has been sent to HCD, what are the purpose of the comments? Where will they go and to what purpose?

Thank you,
Laura

Sent from [Mail](#) for Windows

From: [Natalie Bennion](#)
To: [Planredondo](#)
Subject: Housing needs to go in 90277
Date: Tuesday, August 24, 2021 11:56:58 AM



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

North Redondo Beach is already doing it's share to accommodate more housing. Please zone 1,245 units in the 90277 part of town. There is availability in areas such as the 50 acre power plant site.

August 25, 2021

Ms. Robin Huntley
Senior Housing Policy Specialist
State of California
Department of Housing and Community Development
2020 West El Camino Boulevard, Suite 500
Sacramento, CA 95833
Robin.Huntley@hcd.ca.gov

Re: Redondo Beach Housing Element (2021-2029)

Dear Ms. Huntley:

The city of Redondo Beach (Redondo) has spent the last generation fighting development, by right and otherwise. It has downzoned properties to the point that development or redevelopment of more than a handful of units is no longer feasible and often appeals projects to make sure they are developed at significantly below their underlying density.

The Legado Project at 1700 S. PCH typifies the fierce resistance to development in Redondo. First conceived in 2010 as a 180-unit project, the property was cut down by over one third (now 115 units) and is still awaiting permits more than a decade later. Even though Redondo had no intention in allowing the original project to be built and forced it into litigation for several years, it didn't mind including the 180-units in its 5th housing element cycle (2014-2021).

Given these dynamics, it's a wonder Redondo even completed 40% (559 of 1,397) of its requirement during the 5th cycle. Looking forward, it's hard to imagine how it will meet its 6th cycle requirement of 2,490 units without taking proactive steps to update its zoning throughout the city. Redondo's solution thus far has been to push nearly half the requirement (1,210 units or 49% of the total) into the fringes of the city that are highly trafficked and literally at the city's edge. In fact, a quick review of all the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190th), shows all of them to be adjacent to other, less affluent jurisdictions. Furthermore, a close review of those overlays shows the probability of any units materializing within them are extremely low. Some examples are as follows:

1. North Tech, a 5 parcel, 14.26-acre site comprised of three property owners and entirely within 250 meters of the freeway. It is the only portion of Redondo east of the 405 and surrounded by the city of Lawndale. Estimated to accommodate over a quarter of Redondo's housing requirements (685 of 2,490 or 28%), the properties include the following:
 - a. a business that has been in Redondo since 1985 and has no intentions of relocating or shutting down; and
 - b. a grocery anchored shopping center owned by a national REIT with no plans of selling or repositioning the property given its 100% occupancy strong roster of 17 tenants including Vons and Petco and no vacancy; and

- c. a national plumbing fixture showroom that has been there for years. Not only is the likelihood of any residential being developed in this area extremely low, but any units developed would pose serious adverse health impacts on its residents.¹
2. The 6.21-acre South of Transit Center - Industrial Flex site at 2819 182nd Street, across the street from the city of Torrance, is planned to accommodate 224 units. The problem with the plan however is the property was purchased by NantWorks in 2019 and intended to house one of its portfolio companies. The company is owned by one of Southern California's wealthiest individuals and has been working with the city on a specific project, which does not include housing, for years.
 3. The South Bay Galleria, a 29.85-acre shopping mall across the street from the cities of Lawndale and Torrance sought entitlements for 650 units only to settle for 300 five years later. In addition to housing, it was entitled for 1,593,144 square feet of retail, office and hotel in January 2019 with groundbreaking anticipated in early 2020. Instead, halfway through 2021, no plans have been submitted to the city for review and no updated project timeline provided. Given the vast impacts of the covid pandemic on retail, significant changes to the project are likely to be requested and fought over in the years to come further pushing back the project.

As evident from the above, Redondo continues to employ the same gimmicks it has used for decades to appear to satisfy state laws while openly disregarding them. If it were serious about housing, it would zone exclusively for residential, not overlays. The reason it has avoided doing so is because eliminating non-residential uses would result incite vocal protest from the property owners, exposing Redondo to the phantom units it hopes to count.

These deceitful tactics of creating illusory housing in congested industrial corners at densities nowhere else available within the city while ignoring changes to most of the city are part and parcel of an entitled electoral body that believes itself to be above the law and beyond reproach. Convenient, if not practical, solutions supplant good policy resulting in suitable locations not being given consideration in and around more affluent parts of the city.

Appropriate alternatives that can be exclusively residential or mixed use are the 1-acre site at 1021 N. Harbor and the 50-acre power plant at 1100 N. Harbor. Both are adjacent to parks, bike paths, beaches and harbors and surrounded by developments ranging from 17.5 to 120 units per acre but were not considered for housing. In fact, the General Plan Advisory Committee was specifically instructed to not propose any zoning for 1100 N. Harbor during the general plan update and yet still, the Planning Commission voted 5-2 to recommend 50% of the site zoned at 30 dwelling units an acre. Not surprisingly, the City Council ignored the recommendation because it realized it could make up units in areas that are not suitable, practical, or even available and in fact, will never exist thus placating the state without in any way helping solve the housing crisis before us.

¹ Per the American Lung Association, being within 300-500 meters of a highway has show serious health effects on both children and adults. [Living Near Highways and Air Pollution | American Lung Association](#)

1021 N. Harbor has been vacant and unused for years, has no remediation issues, is currently surrounded by housing, and has a willing property owner eager to build housing on the site. 1100 N. Harbor is being cleaned and remediated in anticipation of its closure on or before December 31, 2023, has studies and reports confirming housing could be built on the site within the 6th cycle and an eager developer seeking such approvals. One must wonder, if Redondo is open to 909 units on 20.47 acres (North Tech and Industrial Flex) that are occupied, why wouldn't it support the same spread over more than two and a half times as much land that's vacant? One must conclude that 1021 and 1100 N. Harbor were deemed unsuitable because the city knew it would mean real housing units and tangible impacts on today's housing crisis.

Therefore, I strongly urge you to reject the housing element and reprimand the city for its blatant attempt to skirt the law. If it wishes to count the 909 units, it should obtain commitments from the four property owners that they support and will pursue such plans. The concentration and location of the overlays serve as glaring reminders of how disingenuous Redondo's effort really is. HCD should demand the city be more candid with its site selection, fairer to its electorate by spreading development throughout the city and demonstrate that sites planned for housing can actually accommodate them. Lastly, I hope HCD educates the city that housing is better suited in areas surrounded by parks and open space than by freeways and industrial centers.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leo P".

Leonid Pustilnikov

Attachments:

1. Housing Element Update Letter dated May 11, 2021 regarding 1100 N. Harbor
2. Housing Element Update Letter dated May 11, 2021 regarding 1021 N. Harbor
3. Planning Commission Land Use Recommendations dated April 15, 2021

Cc: RBHousingElement@redondo.org
HousingElements@hcd.ca.gov

May 11, 2021

VIA ELECTRONIC MAIL

Mayor Brand and Honorable Members of
Redondo Beach City Council
415 Diamond Street
Redondo Beach, CA 90277

Re: Housing Element Update (RHNA Allocation for AES Power Plant Site at 1100 N. Harbor); Agenda Item N.2, 5/11/21 City Council Meeting

Dear Mayor Brand and Honorable Members of the Redondo Beach City Council:

This office represents the current fee owners¹ of the approximately 50-acre site on which AES operates the Redondo Beach Generating Station (“Power Plant”). As you know, on April 15, 2021, the Redondo Beach Planning Commission voted, 5 to 2, in favor of correcting the general plan designation for the Power Plant site, to mixed use allowing 30 dwelling units per acre for up to 50% of the Power Plant site. The Owners agree with the Planning Commission’s recommendation and welcome the opportunity to discuss with the City Council their plans for future reuse of the site when the Power Plant operations cease.

As it currently stands, the California State Water Resources Control Board (“Water Board”) has exempted the Power Plant site from operation of the Water Board’s new “Once Through Cooling Policy” (“Policy”) through December 31, 2021. AES will continue to operate the Power Plant through that date and further retains the right to seek additional exemptions to allow it to operate through December 31, 2023. As the Water Board has indicated, the amendment to the Policy allowing for this exempted use is, at least in part, necessary for potential backup electric generation for the regional grid.

Owners have begun planning for the ultimate re-use of the Power Plant site. While the General Plan designation previously allowed for economically viable re-uses, on November 2, 2010, the Redondo Beach electorate approved Measure G, creating a new land-use designation of “Generating Plant” (something that did not previously exist and does not exist within the City’s zoning code) which was exclusively applied to the Power Plant site (and no other). Measure G eliminated all economically viable re-uses of the site when the Power Plant operations cease.

¹ The fee owners of the Power Plant site include 9300 Wilshire, LLC, 1112 Investment Company, LLC, Ed Flores, LLC, 9300 Wilshire Fee, LLC, David Dromy, 1650 Veteran, LLC, Outdoor Billboard, LLC, BH Karka, LLC, 5th Street Investment Company, LLC, 505 Investment Company, LLC, SLH Fund, LLC, and Peak Alcott, LLC. Collectively, the fee owners are referred to herein as “Owners.”

Mayor Brand and Honorable Members of
Redondo Beach City Council
May 11, 2021
Page 2

Owners understand the history of the Power Plant site and the myriad land-use tools that were used to shut down the Power Plant operations and effectively convert the site to open space and parklands. These efforts are the subject of a pending inverse condemnation lawsuit filed against the City in which Owners seek just compensation as a result of the City's regulatory taking and spot zoning. (See Cross-Complaint filed in *City of Redondo Beach v. California State Water Resources Control Board*, Los Angeles County Superior Court Case No. 20STCP03193.)²

As noted, Owners welcome the opportunity to discuss with the City Council the recommended re-use of the site for mixed use development of 30 dwelling units per acre for the site. As the Southern California Association of Governments ("SCAG") has determined, the City must allow for the construction of at least 2,490 additional residential units in its Regional Housing Needs Assessment ("RHNA"). The City historically has placed most of its planned housing units in North Redondo, removing the ability to develop adequate housing on sites much better suited for residential development. With the impending closure of the Power Plant, the 50-acre Power Plant site represents the prototypical "underutilized" property that State Law has determined should be made available for future development. State law, in fact, compels the City to identify underutilized properties on which local governments may plan for future housing development.

With respect to whether the Power Plant site will be available for housing development by 2028, Owners' consultants have developed a plan and timetable for closure and clearing of the Power Plant facilities by 2027. This assumes that AES may obtain additional extensions allowing for intermittent Power Plant operations through December 31, 2023. Even with this assumed date, Owners are prepared to have a substantial portion of the site cleared allowing for residential development on approximately half the site by late 2025, with the remainder of the site cleared by 2027. There is no question this site qualifies as an appropriate "underutilized property" for which much of the additional RHNA housing units may be accommodated.

Additionally, the sites proposed in the North Tech area of the City are less suitable for redevelopment into housing and may not qualify as part of the RHNA process for the following reasons: i) they are adjacent to industrial uses and freeways which have potentially harmful effects on health;³⁴ ii) Northrup Grumman, the City's largest employer strongly opposes the overlay as the work conducted and noise emitted from such work make residential occupancy unsuitable in such close proximity; iii) eliminating commercial and industrial areas from the City will only amplify the severe housing jobs imbalance;⁵ iv) eliminating business districts will further erode the City's tax base; v) commercial and industrial uses have staggered lease terms that may prevent the sites from being available until well after 2028;⁶ and vi) eliminating industrial uses, many of

² Approximately 2:36-2:38 into the May 4, 2021 City Council Meeting, the City's own consultant alluded such actions were a taking.

³ Sites have been analyzed whether historical use precludes residential development or what level of clean up would be necessary.

⁴http://www.publichealth.lacounty.gov/place/docs/DPH%20Recommendations%20to%20Minimize%20Health%20Effects%20of%20Air%20Pollution%20Near%20Freeways_Final_March%202019.pdf

⁵ While density per zip code and district were analyzed, was school crowding per area ever reviewed?

⁶ E.G.: 2701 Manhattan Beach Blvd. (MBB) is on a ground lease expiring 4/1/2044, 2061 MBB and 2420 Santa Fe Ave. were both acquired in

Mayor Brand and Honorable Members of
Redondo Beach City Council
May 11, 2021
Page 3

which are last mile distribution of goods movement will only increase traffic as they would be pushed further away from the households they serve.

The Power Plant site is superior for a mixed use redevelopment that includes the above recommended housing in addition to uses such as office, retail, hospitality, and potentially content production or studio space. A large commercial or mixed use campus would help remedy the housing jobs imbalance of the City and actually ease traffic congestion during rush hour while relying on space capacity from the direction against gridlock.⁷ One such development concept the owners are contemplating is as follows:

1. 750 residential housing units
2. 300 key hotel
3. 750,000 square feet of office (up to 20% of which would be studio or production space)
4. 150,000 of retail, restaurant and event space

Again, Owners stand ready, willing and able to discuss an economically viable re-use of the site as appropriately recommended by the Planning Commission. We look forward to working with the City through this Housing Element and General Plan update.

RUTAN & TUCKER, LLP



Douglas J. Dennington

DJD:pj

2020 by Rexford Industrial, a publicly traded REIT whose business plan generally includes holding industrial assets for a decade or longer.

⁷ If residents and pass through traffic is now captured within the City, it will ease the congestion getting out and benefit from the spare capacity from the other direction (e.g. southbound in the AM hours and northbound in the PM hours) coming into the City during rush hour.

May 11, 2021

VIA ELECTRONIC MAIL

Mayor Brand and Honorable Members of
Redondo Beach City Council
415 Diamond Street
Redondo Beach, CA 90277
cityclerk@redondo.org

Re: Housing Element Update (RHNA Allocation for 1021 N. Harbor); Agenda Item
N.2, 5/11/21 City Council Meeting

Dear Mayor Brand and Honorable Members of the Redondo Beach City Council:

This office represents New Commune DTLA LLC, the owner of the only privately owned fee interest within the Harbor located at 1021 N. Harbor. The approximately 1 acre site is primarily surrounded by multifamily to the north and west and commercial uses to the south and east. The site is at the end of the Strand in Hermosa Beach developed at in excess of 17.5 units per acre and is adjacent to both the Crystal Cove Apartments and the King Harbor Apartments, developed at in excess of 50 units and 100 units per acre respectively.

The site is currently zoned CC-4 with allowed uses including but not limited to retail and restaurant on the ground floor and hotel and office above the ground floor. My client would respectfully like to request that the City Council consider allowing residential uses in addition to the other approved uses for the site at a density of not less than 30 dwelling units per acre. This change would allow my client to plan for the redevelopment of the site in the post-Covid era where more and more people are working from home while at the same time allowing the City of Redondo Beach satisfy its some of its most recent Regional Housing Needs Assessment ("RHNA") requirements.

We thank you for your consideration of this matter and look forward to working with the City through this Housing Element update.

RUTAN & TUCKER, LLP



Douglas J. Dennington

DJD:pj

From: Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>
Sent: Thursday, August 26, 2021 6:45 AM
To: Sean Scully <Sean.Scully@redondo.org>; Brandy Forbes <Brandy.Forbes@redondo.org>
Cc: Veronica Tam <veronica.tam@vtaplanning.com>
Subject: Fw: Resident of North Redondo

HCD is forwarding comments received on Redondo Beach's draft housing element and offers the City an opportunity to respond.

Robin Huntley
Senior Housing Policy Specialist
State of California
Department of Housing and Community Development
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833
*****New Phone Number*** (916) 695-7770**



From: Melissa Dagodag
Sent: Wednesday, August 25, 2021 6:50 PM
To: Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>
Subject: Resident of North Redondo

I am an attorney and a resident of North Redondo Beach living in a single family house in the Golden Hills neighborhood.

It's my opinion that the best place to build the proposed high density housing in Redondo Beach is the 50 acre Power Plant that is being decommissioned. Please don't ignore my voice. I am a Stanford University educated attorney who used to be a Commissioner for the City of Santa Monica when I lived there. I care about Redondo!

Please don't allow the City Council to put housing in sites that are bad for the community when there are large parcels next to the beach, bike paths and parks.

Regards,

Melissa K. Dagodag

The Law Offices of Melissa K. Dagodag
468 North Camden Drive
Beverly Hills, California 90210
Tel.:

Comments to the 2021-2029-Housing Element
Sheila W. Lamb

Section	Page	Text	Comments
General			it would be helpful to the public if the new additions to the housing element were identified by marking "NEW" next to the narrative.
2.2.1	1	Introduction:	Please add the following paragraph to section 2.2.1 at the beginning of the section. It clarifies for the public the specific purpose for the housing element: The Housing Element is the City's official municipal response to the State Legislature's declaration that adequate housing for all economic segments of the community is a matter of statewide importance that must be addressed by all levels of government.
2.2.1C	2	Public Participation	See Appendix C Below
2.2.2D	22	Homeless-Resources Available:	Please provide a list/table of the resources available in Redondo Beach for the unhoused at the beginning of the paragraph. This section is confusing.
2.2.2D	22	Homeless-Resources Available:	The 2020 Greater LA Homeless Count is used here. There is an updated count for 2021 -
2.2.2D	22	Homeless-Resources Available	Please provide clear definitions of emergency shelters, transitional shelters, and temporary shelters. Please list the shelters that are available in RB. This section is confusing.
2.2.2E. Table H22	24	Single family attached units	This section is confusing. Please provide to the public data regarding attached units: for example, what is the distinction between attached units and 2-4 units (which are also attached)? Is single family attached a required category? If this category is not required, the percentage of single family homes would be less than 40%.
2.2.3A	34	Constraints on Housing Production-Government Constraints	
	34	"Redondo Beach residents, however, have become increasingly concerned over the impacts of new housing on neighborhood character, public services, and infrastructure. Consequently, land use controls related to housing and residential development have been strengthened over recent years."	This is a subjective statement based on a consultant's point of view and is not relevant to the heading, "Government Constraints." Please delete this sentence. Redondo Beach residents are interested in providing affordable housing in the community. Please include that in the narrative.
2.2.3A4		Provision for a Variety of Housing Types	

Section	Page	Text	Comments
Table H35-H36	41-42	This table is incorrect regarding RCFE's	Any section in the M/C that allows senior housing by definition includes RCFE's. In sections that list RCFE's only, RCFE's are allowed in that zone but not Senior Housing in the broader term. M/C 10-2.1624 Housing for senior citizens-conditionally permitted in R3, RMD, RH, M/C 10-2.511 Senior housing conditionally permitted reaffirms the above. M/C 10-2.620 Senior housing conditionally permitted in C2A,B,C,PD, M/C 10-2.630 Senior housing permitted conditionally in C3 (as above). M/C 10-2.910 Senior housing conditionally permitted in MU-1, MU-3, MU-3A, MU-3B, and MU-3C mixed-use zones, and CR regional commercial zone. RCFE's are a subset of Senior Housing.
2.2.3A4		Provision for a Variety of Housing Types-Zoning and Land Use	The information in the Housing Element regarding senior housing and RCFE's is confusing and lacks validity. See above comment regarding Table H35.
	46	Residential care facilities for more than six persons are conditionally permitted in the Community Facility zone.	This is incorrect. Please see Comment for Table H35
	47	The City also has a P- CF community facility zone which allows residential care facilities through a conditional use permit.	This is incorrect in that it limits RCFE's to the P-CF zone. Please see Comment for Table H35.
2.2.3A4	48	Provision for a Variety of Housing Types-Senior Housing	The information cited here is incorrect. See Comment for Table H35.
2.2.3A4	48	Provision for a Variety of Housing Types-Emergency Shelters, Transitional Housing, Supportive Housing, SRO's	A table here identifying the types of shelters and the location in RB of each type would provide greater clarity for the public.
2.2.3.B5	61	Liquefaction	"Ground water depths within 30 feet of the ground surface is also a condition necessary for liquefaction to occur. For the City of Redondo Beach, a very high zone of liquefaction susceptibility exists within the coastal area where elevations are less than 30 feet above sea level." Please explain how this is a constraint on housing production.
2.2.3B	61-64	Flooding	From the information provided, there are 15 separate sites that are considered high flood risks. Please consider using a table to list these instead of a narrative. A table will provide greater clarity.
Fig. H2/H3	75-76	Sites Inventory	The public will benefit from viewing a "2021 Existing Land Use Map" in addition to the sites inventory map.
Appendix C	C-1	Public Participation	Please list the public workshops that were held specifically for the Housing Element in which the public was able to ask questions regarding information provided in the Housing Element. If no such workshops were held, please include that no specific workshops were held for the public in the Public Participation section, adding suggestions for public participation during the next cycle.

Section	Page	Text	Comments
Add Appendix		List of legislation mentioned in the text.	Please consider adding an additional appendix: A comprehensive list of all the legislation that is mentioned in the text. This would serve to clarify for the public the extensive nature of the state of California's mandates around housing.
Add Appendix		List of zoning amendments in the text.	Please consider adding an additional appendix: A comprehensive list of the new zoning amendments proposed in the Housing Element.
Add Additional Numbers			Please add additional numbers to headings so that the public can more easily search the document.

From: [Brian Clark](#)
To: [RBHousingElement](#)
Subject: Comment on Housing Element
Date: Thursday, September 2, 2021 11:09:01 PM



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

Dear City Council,

I would like to express my opinion on the proposed Housing Element. I have read the full plan, commented previously, and listened to all City Council Meetings on the topic.

First, knowing how much discussion and work went into the development of this plan and the complexities of any large scale endeavor like this, thank you for all your hard work and dedication.

I have several issues with the current plan:

1) **As far as I can tell there is no mention of the GLBTQIA+ at all in the document.** All other categories of people (ethnicities, family types, and even occupations) receive some mention and supporting data. I suppose we are listed anonymously under "other families." But that is insufficient. As a gay member of the community, I feel very disincluded and overlooked. The GLBTQIA+ community is still fighting to hold onto equal rights that are under constant attack. We regularly have to fight for fair consideration and against prejudice and hate crimes and need to be represented in this document in a formal way. We represent a high percentage of homeless teens. The lack of mention shows the city's lack of understanding, caring and support for this part of the population. I can't speak about the entire city, but in the last two years 2 gay families have moved onto our block in Golden Hills. I expect more are out there and should be counted and given the specialized support resources other segments of the population have been given as well. Please feel free to correct me if I missed this information in the long document. A read and a search for LGBT did not turn up any results.

2) **I do not support the placement of the majority of housing in North Redondo Beach, and most specifically the housing adjacent to the 405 freeway.** As a society, we should not be aiming to house the least affluent people in industrial areas or near freeways. This devalues them as people. It harms their health and well being, promotes unhappiness and hurts the greater community. Have you stood near the freeway and experienced the noise and pollution? The least affluent members of our community have enough challenges, without these added stresses and health impacts. This is clearly an area better served by industrial and commercial zoning. I would encourage the Council to think from a human perspective and find housing locations that are suitable for the kind of life that human beings deserve. I know way of thinking will be a departure from the norm, but Redondo Beach has shown itself to be a leader in many areas (like homelessness) and can do so again. Make a plan that is something that truly benefits people. It is the most important and impactful thing the Council can do.

3) **On a broader scope, I am nervous that over-densifying the Northern-most corners of the city will be too impactful a change for one area.** Wouldn't it be better to spread out the development more evenly in smaller parcels? So one corner of the city (that butts up against

other dense regions) is not over developed, while others remain untouched? There was an implication that the Northern corners were closer to transit and so there would be less traffic impact on Redondo by this placement. But just like all of us, life in Redondo moves towards the beaches, west and south. All of these new residents will be travelling (by car mainly) down Artesia and Aviation. Any large-scale density change in one nook of the city is going to have detrimental effects that web out to nearby areas. Spread out the housing so all corners of the city take on their share.

4) During the City Council debates over this issue (which turned caustic, personal and were very disappointing to watch), viewpoints of some council members were completely overlooked, consensus was not gained and important minority voices were disregarded. Similarly, it seems that the majority of community reactions to the plan were minimized or ignored. This is a shame and I hope that the Council can find a better way of working together with each other and residents to the benefit of the city. This is an extremely smart Council and I was saddened to see the discussion take a negative turn and to watch as personal grievances obscured the needs of residents. Before this plan becomes a permanent part of your legacy, please find a way to focus solely on the needs of the city.

Once again, thank you so much for all you do. I know each of you and the staff put in way many more hours than you need to and that you are trying to do the impossible. Your hard work and dedication is appreciated and noticed, even if residents like me disagree or have commentary on the decisions made.

All the best.

Brian Clark

From: [Dan Elder](#)
To: [RBHousingElement](#)
Subject: Draft Housing Element Comment
Date: Thursday, September 2, 2021 3:14:18 PM



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

It's disappointing that the overwhelming feedback from residents and the Planning Commission was ignored by City Council in identifying Residential Overlays for the required RHNA housing location. Allocating nearly every affordable housing unit in North Redondo through high density housing may satisfy the RHNA but puts a significant burden on infrastructure. A more balanced approach as identified by resident feedback in the Community Workshop (April 7, 2021), Social PinPoint (April 7 April 11, 2021), Planning Commission Meeting (April 15, 2021), and even City Council Meetings (April 20, May 4, May 18, and June 15, 2021) would be preferable. While I realize none of our locally elected officials support the RHNA methodology and the impact this much added housing will have, it really appears that the feedback from residents north of 190th was completely ignored in this process.

Thank you,
Dan Elder

From: [Barbara Epstein](#)
To: [RBHousingElement](#)
Subject: Draft Housing Element Comment
Date: Thursday, September 2, 2021 12:17:25 PM

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

Thank you so much for all your work on this.

In spite of state requirements, my view is to preserve and create as much open space and parkland as possible. Greenspace does much to capture water run-off, add ambience, and provide important recreational opportunities for our citizens.

Redondo Beach has suffered from too much density zoning to begin with, so we should minimize density as much as possible in residential neighborhoods. Commercial corridors would be greatly improved with imaginative design.

It is critical to increase the tree canopy in the city, insuring healthier air quality, capture carbon, provide shade, and create habitat and beauty around every neighborhood.

Thank You

Barbara Epstein
SBPC
RBCG Committee

Sent from my iPad

Comments on City of Redondo Beach: 2021-2029 Housing Element (June 2021)

From: Gregory McGinity (1916 Carnegie Lane #C, Redondo Beach, California 90278)

Date: September 2, 2021

SUMMARY

I would strongly urge the Redondo Beach City Council and the Redondo Beach Planning Commission to reject the *2021-2019 Housing Element (June 2021)*. Due to a severe lack of water, the City of Redondo Beach is not in a position to adopt any plan that calls for additional housing. Instead, the City of Redondo Beach should put in place a system similar to that found in the City of Cambria, which does not allow for additional housing to be developed without additional water. In the City of Cambria, where there has been a long-standing water shortage, the County has imposed a “growth management” ordinance that limits annual issuance of building permits based on access to water.¹

BACKGROUND: 2021-2029 Housing Element

On pages 66-67, the *2021-2029 Housing Element* states the following:

“The City of Redondo Beach receives its water service from the California Water Service Company (CWSC), an investor-owned public utility whose operations are regulated by the State of California Public Utilities Commission (PUC). The California Water Service Company has been providing water service to the City since 1927. For operational and maintenance purposes, the City of Redondo Beach is classified within the Hermosa-Redondo District, an area containing all of the City of Hermosa Beach, all of the City of Redondo Beach, and an 800-acre portion of the City of Torrance located directly south and southwest of the City of Redondo Beach. All water supplied to and used in the City of Redondo Beach comes from one of two sources.

- 1) Water purchased by the California Water Service Company from the larger, regional Metropolitan Water District (MWD). This water is pumped into the city through four MWD connector lines.
- 2) Water pumped up from local groundwater sources by the California Water Service Company through a series of three wells located in the far north end of North Redondo Beach.

Approximately 85 percent of the water supplied to the City of Redondo Beach is purchased from the MWD, while approximately 15 percent is pumped up from groundwater sources through wells in the city. The California Water Services Company reports that it is presently meeting all of the district’s existing water service needs and the vast majority of its systems pipes are in better than average conditions. According to CalWater’s Urban Management Plan, water demand in the Hermosa-Redondo District is

anticipated to reach 14,778 AFY (Acre Feet Per Year) in 2040. The water supply is projected to be 14,967 AFY in 2040. **Therefore, adequate water supply is available to accommodate the City's housing needs through 2040,** well beyond the current RHNA planning period.

The facts of our current environmental and water circumstances, including the recent report from the Intergovernmental Panel on Climate Change (IPCC), recent announcements from several California agencies, and the challenges confronting the Colorado River Compact all belie this statement. I believe if the City Council and Planning Commission were to carefully review the current status of the City of Redondo Beach's water supply, you will find that we do not, in fact, have anywhere enough water to accommodate the City's housing needs through 2040.

To the contrary, I would argue that the City of Redondo Beach does not have nearly enough water to accommodate the City's current water needs without severe restrictions. Any new housing approved in the City will require additional water rationing on the part of current residents. As it is the City Council's primary purpose to protect and support the current residents of Redondo Beach, such a policy and the *2021-2029 Housing Element* should be rejected.

BACKGROUND ON IMPACT OF CLIMATE CHANGE ON CALIFORNIA'S AND REDONDO BEACH'S WATER SUPPLY

According to the federal National Aeronautics and Space Administration (NASA), "global warming is expected to make droughts more severe in the future. Even in "low emission" climate scenarios (forecasts that are based on the assumption that future carbon dioxide emissions will increase relatively slowly), models predict precipitation may decline by 20-25 percent over most of California, southern Nevada, and Arizona by the end of this century. Precipitation declines combined with booming urban populations will present a significant challenge to Western water managers in the near future."ⁱⁱ

This finding is echoed in the recently released report from the IPCC, which indicated that, "Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation and the severity of wet and dry events."ⁱⁱⁱ That is, the continued global warming is intensifying the challenges related to droughts, such as the one we have been experiencing in California.

It is clear that climate change will put significant stress on Redondo Beach's current water supply.

CURRENT AND FUTURE WATER RESOURCES

Cal Water has provided high-quality water utility services in the Hermosa Redondo area since 1927. The Hermosa-Redondo system serves customers in the cities of Hermosa beach, Redondo Beach, and portions of Torrance. To serve the customers in this area, Cal Water uses a combination of local groundwater and surface water purchased from the Metropolitan Water District of Southern California (MWD), which is imported from the Colorado River and the State Water Project in northern California.^{iv}

To reiterate, as indicated in the *2021-2029 Housing Element*, 85 percent of the water we need comes from the MWD. The MWD doesn't produce any water, so where does it come from?

According to the MWD, 45% of their water comes from "Local Stormwater, Groundwater, Recycling, and Desalination." 30 percent of the MWD water comes from "the State Water Project" and 25% of the MWD water comes from "the Colorado River Aqueduct."^v So 46.8 percent, or nearly half, of the water we receive in the City of Redondo Beach comes from the State Water Project and the Colorado River Aqueduct.

I think we would agree that if the sources of almost 50 percent of our water needs were not able to supply our water that would be a problem for current Redondo Beach residents and not provide any opportunity for new housing. Yet, that is where we find ourselves today. If we conduct a careful analysis of the status of both the State Water Project and the Colorado River, one cannot help but see the water supply for the City of Redondo Beach is in a perilous condition.

BACKGROUND ON THE STATE WATER PROJECT

In March of this year, the California Department of Water Resources (DWR) announced an adjustment to its initial State Water Project allocation for the 2021 water year. "The department now expects to **deliver 5 percent of requested supplies this year**, down from an initial allocation of 10 percent."^{vi} The Director of DWR stated, "We are now facing the reality that it will be a second dry year for California and that is having a significant impact on our water supply."^{vii} The ongoing megadrought that we are facing in California will have significant and long-term negative consequences on the ability of the State Water Project to supply the MWD with the water it is counting on, which means the MWD will likely not be able to provide Redondo Beach and other cities in Southern California with the water we all need.

BACKGROUND ON THE COLORADO RIVER

There has been a two-decade-long megadrought along the Colorado River. In August 2021, low water in the Colorado River's largest reservoir triggered the first-ever federal declaration of a Tier 1 shortage. According to the United State Bureau of Reclamation, which manages the water that the seven states (40 million people) use from the Colorado River, water in Lake Mead, which is one of the largest reservoir's that feed the water systems in the western United States, was about 35 percent full.^{viii} While California does not lose any water under a Tier 1 shortage, if trends continue, it will be only a matter of time before California will begin to lose water from the Colorado River that flows into the MWD system that then flows to Redondo Beach.

It is important to recognize that the current Colorado River Compact, which governs the allocation of water, will have to be re-negotiated in 2026. If the drought continues to worsen, which given the previous twenty years of data is highly likely, California will likely experience a cut in its allocation, which means the MWD will see a reduction in its allocation, which means Redondo Beach will see a reduction in its allocation.

According to the environmental organization the Glen Canyon Institute, it is clear that the "Colorado River Basin is facing a water supply crisis...the growing demand (for water), the

relentless shortage (of water), and climate change are creating an average water deficit of almost 1 million acre-feet per year in the Colorado River System.”^{ix}

According to the U.S. Department of the Interior, since 2000, the Colorado River Basin has experienced the driest 16-year period in over 100 years of historical natural flows (Bureau of Reclamation, 2015). This period also ranks as the fifth driest 16-year period in the last 1,200 years (Meko et al., 2007a and 2007b).^x By all accounts, the idea that in the near term the MWD can continue to count on the usual allocation of water from the Colorado River is foolhardy. The idea that the MWD can count on the usual allocation of water from the Colorado River through 2040, which is the statement in this report, is laughable.

ADDITIONAL BACKGROUND

Many experts believe that climate change has created a situation in California and in the west that is past a drought and moved to aridification – a long-term, more permanent desiccation of the region. According to Jay Lund, the co-director of the Center for Watershed Sciences at the University of California at Davis, “We are in worse shape than we were before the last drought, and we are going to be in even worse shape after this one.”^{xi} We know that three-quarters of California is already experiencing extreme drought. Governor Gavin Newsom declared a drought emergency in 41 counties.^{xii}

The Sierra Nevada snowpack, which provides about a third of California’s water, dwindled to 5 percent of average in May of this year. This equaled April 2015’s record-low percentage. According to a CalMatters article these changes signal “trouble for California reservoirs.”^{xiii}

Given these current circumstances, it would not be surprising if the State of California were to mandate more than the 25 percent cut in water usage that the State Water Resources Control Board implemented in 2015.^{xiv}

As for the future, according to the California Department of Water Resources, “Climate change is expected to impact our supply and demand for water in critical and non-complimentary ways. Earlier and decreased runoff can reduce water supplies, even when overall rainfall remains the same. This trend could mean less water available for agriculture, the environment, and a growing population (NOTE: such as for additional housing in Redondo Beach.) Decreased snowpack is a critical concern. Warmer temperatures will lead to higher snow levels and cause what snow we do get to melt faster and earlier, making it more difficult to store and use. This loss of snowpack means less water will be available for Californians during the hot summer months. At the same time, water demand is expected to grow as higher temperatures and a longer growing season increase the demand for water.” In addition, they believe that “Past patterns can no longer be used to confidently forecast the future.”^{xv}

CONCLUSION

It seems clear from all the available data it is unlikely, or at least highly questionable, that the MWD will be able to supply the water Redondo Beach needs for its current residents. The City of Redondo Beach rather than planning for additional housing development for which there will be no water needs to be strategizing on how it will manage the coming water shortage.

In analyzing the data, the key question that must be asked is do we think the current water situation will get better (i.e., more rain, more snow, Lake Mead and Lake Powell will be filled, etc.), or, more likely, will the situation get worse (i.e., climate change intensifies the current drought, the State of California imposes harsh water cuts, etc.)? If you believe the situation will get worse, and I suggest that is what the data indicates, then it would be foolhardy and a dereliction of duty for the City Council and the Planning Commission to approve this plan. I strongly urge a rejection of this plan.

ⁱ <https://www.cambriacsd.org/water-service-faqs>

ⁱⁱ <https://earthobservatory.nasa.gov/world-of-change/LakePowell>

ⁱⁱⁱ https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf

^{iv} <https://www.calwater.com/facebook-page/>

^v <https://www.mwdh2o.com/planning-for-tomorrow/securing-our-imported-supplies/>

^{vi} <https://water.ca.gov/News/News-Releases/2021/March-21/SWP-Allocation-Update-March-23>

^{vii} <https://water.ca.gov/News/News-Releases/2021/March-21/SWP-Allocation-Update-March-23>

^{viii} <https://www.washingtonpost.com/nation/2021/08/16/colorado-river-water-cuts-drought/>

^{ix} <https://www.glencanyon.org/fill-mead-first/>

^x <https://www.doi.gov/water/owdi.cr.drought/en/>

^{xi} <https://calmatters.org/environment/2021/05/unprepared-california-drought-2021-lessons-learned/>

^{xii} <https://www.gov.ca.gov/wp-content/uploads/2021/05/5.10.2021-Drought-Proclamation.pdf>

^{xiii} <https://calmatters.org/environment/2021/05/unprepared-california-drought-2021-lessons-learned/>

^{xiv}

https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/docs/factsheet/implementing_25percent.pdf

^{xv} <https://water.ca.gov/Water-Basics/Climate-Change-Basics#:~:text=Climate%20change%20is%20expected%20to,environment%2C%20and%20a%20growing%20population.>

From: [Chris Ahearn](#)
To: [RBHousingElement](#)
Subject: Draft Housing Element Comment
Date: Friday, September 3, 2021 7:26:20 AM



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

It is very difficult to see the maps on the draft. Printing them out wastes so much ink for residents, plus they are no clearer when you do that. Your office kindly emailed copies, but the quality was the same, poor. Phone calls to receive better copies went unreturned. As a homeowner in Redondo, I don't feel I have enough information to comment intelligently, and that's a shame. The document is lengthy and quite detailed, and shows evidence of a lot of work, but it does not specifically answer how this plan will affect current homeowners, and it should.

From: [peter aziz](#)
To: [RBHousingElement](#)
Subject: Draft Housing Element Comment
Date: Friday, September 3, 2021 6:39:22 PM



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

The Housing needs to be equally distributed throughout all of Redondo Beach, not just absorbed by one or two of the highest densest districts. Ignoring the public input of nearly 500 residents is a sheer dereliction of duty and equal representation. To move forward and place some of the housing elements in the most undesirable locations in a corridor deemed unfit for housing according to the 2005 AQMD air quality guidelines further demonstrates ignorance on behalf of the council representative and as well as the coercion of the planning department. I certainly hope that the planning department both on staff and on commission understands the impact on quality of life and health which this particular zoning near the freeway can be affected by.

While the council representative so ignorantly cited and stated this article.

<https://www.vcstar.com/story/news/2018/01/01/regulators-shift-views-housing-near-warned-against-housing-near-freeways-due-health-risks-now-theyre/986355001/>

He failed to acknowledge the articulation and competence behind such said studies and missed the exact title of this article <https://www.latimes.com/local/california/la-me-freeway-homeless-housing-20171217-htmlstory.htm>

California officials say housing next to freeways is a health risk — but they fund it anyway

Which Further states the reasoning behind why such poor choices in funding and approving the housing elements in D5 near a freeway are in fact undesirable and hazardous simply equating strategic alterations of air filtration systems and proper greenery will suffice to improve the quality of life that Many of the south Redondo council and residents so flagrantly claim to state "beachlyfe" lifestyle.

http://ph.lacounty.gov/place/docs/DPH%20Recommendations%20to%20Minimize%20Health%20Effects%20of%20Air%20Pollution%20Near%20Freeways_Final_March%202019.pdf

The 2005 AQMD study states on **16 different pages** how increased health risks for lower-income households have risen as contributing factors to poor land-use mitigation occurs on behalf of the biased and unequal representation of incompetent elected officials making those

choices on their behalf.

"The highest cancer risk occurs in south Los Angeles county -- including the port area -- and along major freeways. " (<http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf>)

Please consider removing this motion of the housing element to be appropriately and equally distributed throughout the entire city.

From: [Alisa Beeli](#)
To: [RBHousingElement](#)
Subject: Redondo Beach Housing Element comments
Date: Friday, September 3, 2021 7:40:32 PM



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

Dear Redondo Beach Housing Element,

I am a resident of Redondo Beach and would like to submit the below comments to the Redondo Beach Housing Element 6th cycle plan.

I strongly urge you to reject the Housing Element plan for the following reasons:

- The Housing Element plan approved by the Redondo Beach City Council places nearly all (94%) of the required units in the North/90278 zip code (2,340 of the 2,490 required units). This is blatantly unfair to the residents of North Redondo and the required housing should be distributed throughout all of Redondo Beach, including the South/90277.
- The plan places nearly all of the newly zoned parcels into the edges of the city, areas that are highly trafficked and bordering surrounding cities such as Lawndale and Torrance which of course have their own housing requirements. This will not solve our housing issues, it will exacerbate them.
- All of the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190th) are adjacent to less affluent areas of the city, all in North Redondo/90278. By contrast, the plan does not provide increased housing in the more affluent, beach-adjacent, communities of South Redondo/90277. My understanding is that state law prohibits the concentration of low income housing in one location, and that it must be distributed throughout the city. I do not understand why the Housing Element plan can even be considered in its current state.
- The North Tech area is estimated to accommodate 28% (685) of the required units on its own. The current property owners on that parcel include a business and grocery anchored shopping center with no plans of relocating. It is also in close proximity (within 250 meters) of the 405 Freeway. Not only is the likelihood of any residential units being developed in this area extremely low, but any units developed would pose serious adverse health impacts on its residents. The residents of this area would also have a roughly 45-minute commute to the one high school in Redondo Beach.
- There are alternative options in South Redondo/90277 that were not considered by the City Council. Those include the 1-acre site at 1021 N. Harbor and the 50-acre power plant at 1100 N. Harbor. The power plant location is being cleaned and remediated in anticipation of its closure by the end of 2023. It is also adjacent to parks, bike paths, the beach and the high school. South Redondo options were largely ignored by the City Council, even though the Redondo Beach Planning Commission voted 5-2 to recommend 50% of the power plant site zoned at 30 dwelling units per acre.
- Redondo Beach completed 40% (559 of 1,397) of its 5th cycle RHNA. Given the issues of the 6th cycle plan, it's difficult to imagine how Redondo Beach would meet its requirement of 2,490 units without taking proactive steps to update its zoning throughout the city.

Placing the majority of new housing units in North Redondo/90278 near freeways and industrial centers does not seem realistic or equitable. I am concerned about traffic and over-crowding at North Redondo schools, if this Housing Element were ever to be implemented.

I am also concerned that the hundreds of public comments and emails to the City Council and Mayor regarding the issue of placing the majority of units in North Redondo have been entirely ignored.

Please listen to our concerns and evaluate the plan with the idea of better distributing housing throughout the entire City of Redondo Beach, not just the North.

Thank you for your time and consideration.

From: [Mariam Pashtoonwar](#)
To: [RBHousingElement](#)
Subject: Draft Housing Element Comment
Date: Friday, September 3, 2021 7:51:18 PM

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

Hello,

I am a resident of North RB in D4, and am requesting the housing be evenly distributed throughout the city to minimize impact to one particular district. D4 is already the second densest district, if not the most, and we cannot accept the majority of housing. We need to consider the impact on our schools and resources. Additionally, low income housing should certainly be distributed equally throughout Redondo to ensure housing equality.

Thank you,

Mariam P. Butler DPT
Sent from my iPhone

From: I
To: [RBHousingElement](#)
Cc: HousingElements@hcd.ca.gov; info@fairhousingelements.org
Subject: Segregation is NOT normal, it's an act of systematic violence against civilians that is still be committed today!
Denying housing is an act of violence!
Date: Friday, September 3, 2021 11:29:19 PM



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

We must build more affordable housing in ALL neighborhoods across Redondo Beach! The working class, seniors, students, those with low or no income, and many others all deserve safe, clean, and affordable housing. Segregation is NOT normal and the coastal cities have been absolutely violent in the displacement of **lower-income and black residents specifically!**

Denying housing that residents can afford is an act of violence and as a friendly reminder, the state can capture public land from local cities refusing to comply with the housing element. **LA County residents have been requesting more affordable housing for over 10 years now, we've been patient long enough!** It's time to return affordable housing, both rent and homeownership, to the working class, seniors, students, & many others in need!

Poverty is a failed policy choice! We don't need local jurisdictions upholding illegal segregation as it relates to race & class, as I said it's illegal, and cities can be sued for it! **We MUST build more housing in ALL communities across Redondo Beach especially as SFZ comes to an end!**

--

Best,

Tieira

www.HTWWS.org



(((Matthew Lewis))) has some... · 7h ...

Replying to @constans

@HowTheWestWS and @schroedinger_

We don't have a "housing market" in California, by any sense of the term. We have a cartel of city governments who openly and proudly conspire to limit the supply of housing.

car·tel | kār'tel | noun

• an association of manufacturers or suppliers with the purpose of maintaining prices at a high level and restricting competition

8% of the overall population is Black, but Black people represent

34% of those experiencing homelessness.

#BlackHistoryMonth



Vaccinated **Masked** **Pr...** · 13h ...

We don't have to have a landlord/tenant model of housing. Let's start there.

80 1,334 7,775



Vaccinated **Masked** **Pr...** · 13h ...

This is another example of how European colonization operates to limit our imagination of what is possible in terms of how we exist as a human civilization. The whole model of landlords & tenants is an export of the European feudal system. We don't have to keep it.



Vaccinated **Masked** **Pr...** · 13h ...

Replying to [@BreeNewsome](#)

We're talking about a situation where white colonizers stole vast amounts of land they continue to occupy and charge us rental fees for. The origins & underlying structures of the system make it impossible for justice or fair access to exist.







From: mjteola@aol.com
To: [RBHousingElement](#)
Subject: Draft Housing Element Comment
Date: Friday, September 3, 2021 9:09:18 PM



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

Good Evening,

I briefly scanned this document. The document is very thorough and it is evident that a lot of research went into the preparation and organization of data.

I am disappointed in the timelines. I received the email regarding this document yesterday, and the comments were due today, September 3. I did attend two meetings of the General Plan and participated in the "Pinpoint" Survey. I notice there were meetings in April, in addition to discussions at City Council. I was not aware of other discussions of the Plan. If you truly want public input, I would suggest that you notify residents in a timely matter so they can actually participate. In scanning the document, which is rather long, I would suggest, that a summary be attached as to the main points. How will the city of Redondo Beach be impacted by the recommendations in this document?

Though I did not have as much time as I would have liked to review the document and ask clarifying questions, I do not understand how a single family residence in District 3 can be compared to a single family residence in District 1. How can these possibly be the same? One chart seems to indicate the height of the homes are 30 feet and two-story. If that is the case, why are there two-story homes with a third floor?? Is this a change in the building code? I am proposing that a meeting, zoom meeting, be scheduled to discuss the plan in terms that the average citizen can understand. In addition, Beach Cities Health District is located in Redondo Beach. Why is that not addressed in the Plan. My understanding is the the deed to the property indicated it is to be used for a hospital? Have other plans been made for the usage of this land?

Sincerely yours,

Marianne Teola

From: [Gabrieleno Administration](#)
To: [Sean Scully](#)
Cc: [Anna Millar](#); [John Torres](#); [Lina Portolese](#); [Luci Hise-Fisher](#); [Matthew Teutimez](#); [Matthew Teutimez](#)
Subject: Re: City of Redondo Beach Housing Element Update - AB 52 and SB 18 Tribal Consultations
Date: Friday, July 23, 2021 2:47:56 PM



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

Hello Mr. Scully,

This is Mr. Salas , I want to thank you for your email . Please note we are fine with your housing element update however if there is any anticipated construction or ground disturbances at this location in the mere future we would like to consult per AB52 and SB18. Thank you for your time and consideration.

On Fri, Jul 23, 2021 at 2:06 PM Sean Scully <Sean.Scully@redondo.org> wrote:

Hello Matthew, Andy, and Brandy,

Thank you very much for taking my call Brandy! I really appreciate it!

I'm following up with this brief email per our call.

Look for a couple letters per AB 52 and SB 18 to be submitted to your office, electronically, in the next couple weeks informing you of the City's release of a CEQA document, Initial Study Negative Declaration, prepared in support of the City's Housing Element Update.

Per our call we'll look forward to your email back noting that the City's Housing Element document (policy document), as it does not include any ground disturbance activities, will not require formal consultations with your Tribe.

Thank you in advance! Looking forward to working with you again!

Sean Scully

Planning Manager

Community Development Department, Planning Division

[415 Diamond Street](#), Door "2"

Redondo Beach, CA 90277

Tel 310-318-0637/1+2405

Fax 310-372-8021

sean.scully@redondo.org

www.redondo.org

Please note that email correspondence with the City of Redondo Beach, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt. The City of Redondo Beach shall not be responsible for any claims, losses or damages resulting from the use of digital data that may be contained in this email.

--

Admin Specialist

Gabrieleno Band of Mission Indians - Kizh Nation

PO Box 393

Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org



The region where Gabrieleno culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleno who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. "The Gabrieleno are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area ". "That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleno, the community simply would not have survived."

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

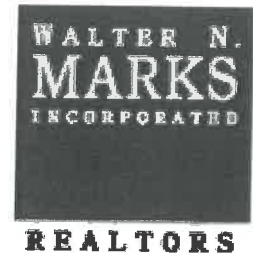
cc: Public Comment City Council Meeting

From: [Mike Martin](#)
To: [RBHousingElement](#)
Subject: RE: Draft Housing Element Final IS/ND and Planning Commission Report Now Available
Date: Saturday, September 11, 2021 4:49:43 PM
Attachments: [6528A10EF5074B919A77E5B4A7E4E8D2.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 stylized and fluid, with a long horizontal stroke at the end.

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



DISABILITY
COMMUNITY
RESOURCE
CENTER



Building a Movement in the Eastside



GREATER LOS ANGELES



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>

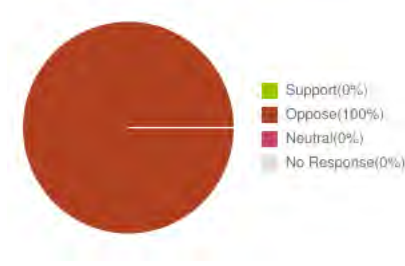
		<p>goal of socioeconomic integration or greater housing affordability. Also, by proposing to accommodate the vast majority of the RHNA goal in the North Redondo block bounded by Marine, Inglewood, Manhattan Beach, and Redondo Beach Boulevards, a location with significant exposure to freeway noise and 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>
---	---	--	--

	this occurs and include actions to mitigate the effects.”	Center.	
Insufficient public review	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.”	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.”	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.

Overall Sentiment



Alisa Beeli

Location:

Submitted At: 2:12pm 09-16-21

Dear Planning Commission,

I am writing to voice my concerns with the 6th Cycle Housing Element, and urge you to reject it. The Housing Element places nearly all of the required units in 90278, which is blatantly unfair to the residents of North Redondo. A better, more equitable plan would distribute the units throughout the entire city, including 90277. My concerns include:

1. The plan places nearly all of the new units on the edges of the city, areas that are highly trafficked and bordering surrounding cities such as Lawndale and Torrance, which of course have their own housing requirements. This will not solve our housing problem, it will exacerbate it.
2. All of the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190th) are adjacent to less affluent areas of the city, all in North Redondo. By contrast the plan does not provide increased housing in the more affluent, beach-adjacent, communities of the South. My understanding is that state law prohibits the concentration of low income housing in one location. How can the Housing Element plan be considered in its current state?
3. North Tech is estimated to accommodate 28% (685) of the required units on its own. Do the current property owners plan on relocating? Also this location is within 250 meters of the 405, which would pose serious health impacts on residents, not to mention a roughly 45-minute commute to high school.
4. Although the Planning Commission originally voted 5-2 to recommend 50% of the power plant site zoned at 30 dwelling units per acre, City Council rejected that idea. City Council also ignored the hundreds of public emails and statements asking to consider alternative sites within 90277, including the power plant site, with its adjacency to parks, the beach and high school.
5. Redondo Beach completed 40% of its 5th cycle RHNA. Given the issues of the 6th cycle plan, it's difficult to imagine how Redondo Beach will meet its requirement of 2,490 units in its current state.

Thank you for listening to my concerns. Please work toward a more equitable distribution of the housing units throughout the entire city of Redondo Beach.

Sincerely,
Alisa Beeli

From: [Huntley, Robin@HCD](mailto:Huntley.Robin@HCD)
To: [Sean Scully](#); [Brandy Forbes](#)
Cc: [Veronica Tam](#)
Subject: Fw: REDONDO BEACH HOUSING ELEMENT - OVERDEVELOPE IS OUT OF CONTROL
Date: Friday, September 17, 2021 9:23:56 AM
Attachments: [Outlook-dxponevd.png](#)



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

HCD is forwarding comments received and offers the City the opportunity to respond.

Robin Huntley
Senior Housing Policy Specialist
State of California
Department of Housing and Community Development
2020 West El Camino Boulevard Suite 500, Sacramento, CA 95833
*****New Phone Number*** (916) 695-7770**



From: luvmypets.07@verizon.net <luvmypets.07@verizon.net>
Sent: Sunday, September 12, 2021 7:52 AM
To: Huntley, Robin@HCD <Robin.Huntley@hcd.ca.gov>; luvmypets.07@verizon.net <luvmypets.07@verizon.net>
Subject: RE: REDONDO BEACH HOUSING ELEMENT - OVERDEVELOPE IS OUT OF CONTROL

Ms. Robin Huntley
Senior Housing Policy Specialist
State of California
Department of Housing and Community Development
2020 West El Camino Boulevard, Suite 500
Sacramento, CA 95833
Robin.Huntley@hcd.ca.gov

RE: Redondo Beach Housing Element

"The best place to put high density housing is the 50 acre Power Plant that is being decommissioned because ocean through cooling plants are now banned. Please don't ignore the 500 voices who used Social Pin Point to express their opinion on where high density housing should be placed."

~

The City Council ignored a large 50 -acre parcel for affordable housing. The owner of the 50 acre parcel submitted a letter stating the land could be ready for housing yet his land was ignored. Appropriate alternatives that can be exclusively residential or mixed use are the 1-acre site at 1021 N. Harbor and the 50-acre power plant at 1100 N. Harbor. Both are adjacent to parks, bike paths, beaches and harbors and surrounded by developments ranging from 17.5 to 120 units per acre and yet were not considered for any housing.

The Planning Commission voted 5-2 to recommend 50% of the 1100 N Harbor Drive site zoned at 30 dwelling units an acre The City Council ignored the recommendation and placed all the new zoning in the

north side of town in areas that are not likely to be built.

Redondo completed 40% (559 of 1,397) of its 5th cycle RHNA. Looking forward, it's hard to imagine how it will meet its 6th cycle requirement of 2,490 units without taking proactive steps to update its zoning throughout the city.

Redondo Beach City Council's solution is to put all of the newly zoned parcels into the fringes of the city that are highly trafficked and literally at the city's edge. While ignoring a 50 – acre site of a decommissioned Power Plant whose owner is more than willing to build affordable housing.

All the overlay zones (North Tech, Industrial Flex, North Kingsdale and 190th), show all of them to be adjacent to other, less affluent jurisdictions.

All the overlays shows the probability of any units materializing within them are extremely low. Some examples are as follows:

1. North Tech, a 5 parcel, 14.26-acre site comprised of three property owners and entirely within 250 meters of the freeway. It is the only portion of Redondo east of the 405 and surrounded by the city of Lawndale. Estimated to accommodate over a quarter of Redondo's housing requirements (685 of 2,490 or 28%), the properties include the following:
 - a. a business that has been in Redondo since 1985 and has no intentions of relocating or shutting down; and
 - b. a grocery anchored shopping center owned by a national REIT with no plans of selling or repositioning the property given its 100% occupancy strong roster of 17 tenants including Vons and Petco and no vacancy; and
 - c. a national plumbing fixture showroom that has been there for years.Not only is the likelihood of any residential being developed in this area extremely low, but any units developed would pose serious adverse health impacts on its residents. The residents would have a 45 minute commute to the only High School and would not be near any of Redondo's neighborhood amenities.
2. The 6.21-acre South of Transit Center - Industrial Flex site at 2819 182nd Street is planned to accommodate 224 units. The property was purchased by NantWorks in 2019 and intended to house one of its portfolio companies. The company is owned by one of Southern California's wealthiest individuals and has been working with the city on a specific project, which does not include housing.
3. The South Bay Galleria, a 29.85-acre shopping mall across the street from the cities of Lawndale and Torrance sought entitlements for 650 units only to settle for 300 units. There already is an EIR in place for 650 units.

I live in North Redondo and we are losing our small town charm. Development is out of control. The traffic in the residential area is bad. The streets are clutter with cars, resulting from families having more than one car, and drive ways are full. The streets are getting narrow, due to the parking. Some streets are worse than others, because parking is on both sides (one way streets). Artesia Blvd, traffic has increased substantially and not safe. Overdeveloped is out of control, and is very disappointing when, people, who sit behind a desk make these decisions, and have no idea what it really looks like around here. North Redondo is packed already. We are not a dumping ground. At what point, is someone going to put a CAP on growth. Over crowding does not make it safe.

Please don't let City Council get away with zoning housing in unlikely sites while ignoring large parcels next to the beach, bike paths and parks.

Thank you for the consideration,

Mary Schurr
North Redondo Beach, California

From: [Robert Doran](#)
To: [Maria Herrera](#)
Cc: [Sean Scully](#); [Lina Portolese](#)
Subject: FW: General Plan Update - Redondo/"Opportunity Area" Designation - 4001 INGLEWOOD AVE AND 4051 INGLEWOOD AVE
Date: Wednesday, September 22, 2021 1:52:37 PM
Attachments: [image004.png](#)
[.msg](#)
[2021_09_22_13_45_09.pdf](#)



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

Maria:

ROIC would welcome the opportunity to introduce High Density Residential to our Redondo Beach Plaza. I have attached some examples of other properties we own where we have recently completed or are in the process of entitling/permitting densification efforts which includes residential components.

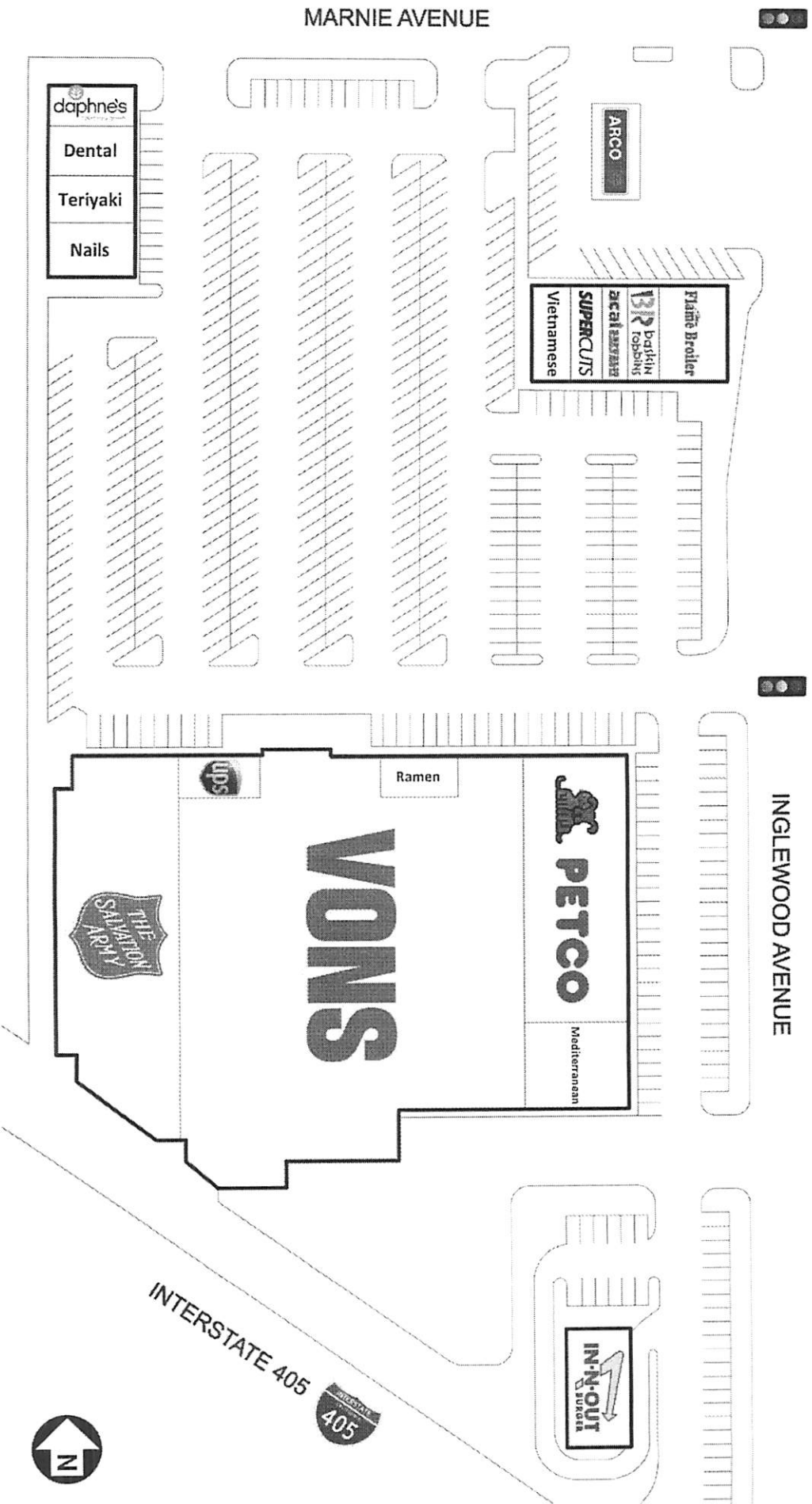
Please let me know if I can be of any further assistance in this endeavor.

Sincerely:

Robert Doran
Director of Development & Construction
RETAIL OPPORTUNITY INVESTMENTS CORP
11250 El Camino Real, Suite #200
San Diego, CA 92130
Office: 858-255-4920

Redondo Beach Plaza

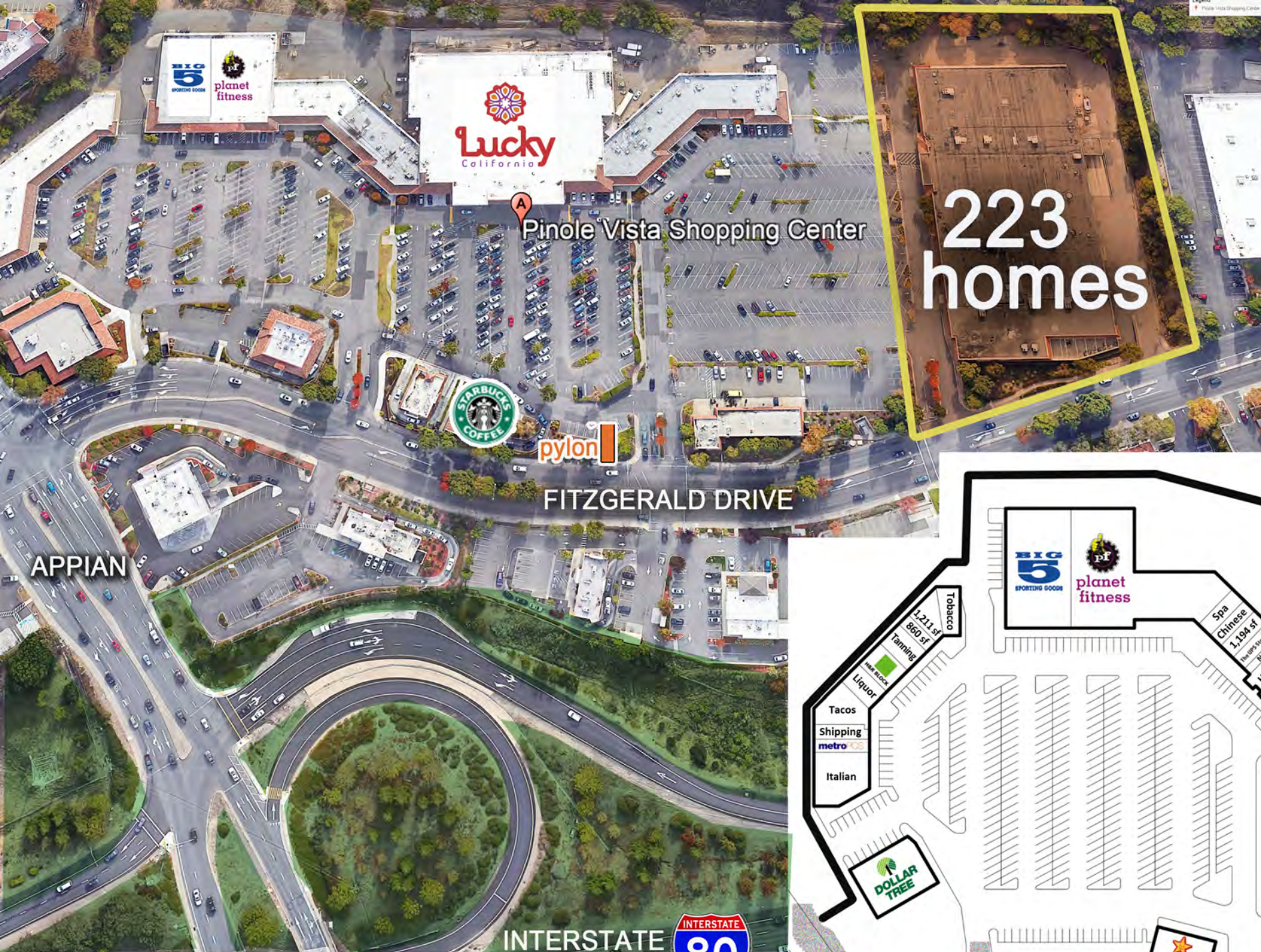
Redondo Beach, CA
110,509 sq. ft.



Courtney Brodie
858.922.6825
888.888.ROIIC (7643)
cbrodie@roireit.net

www.roireit.net

Note: This site plan indicates the general layout of the shopping center and is not a warranty, representation or agreement on the part of the landlord that the shopping center will be exactly as depicted.

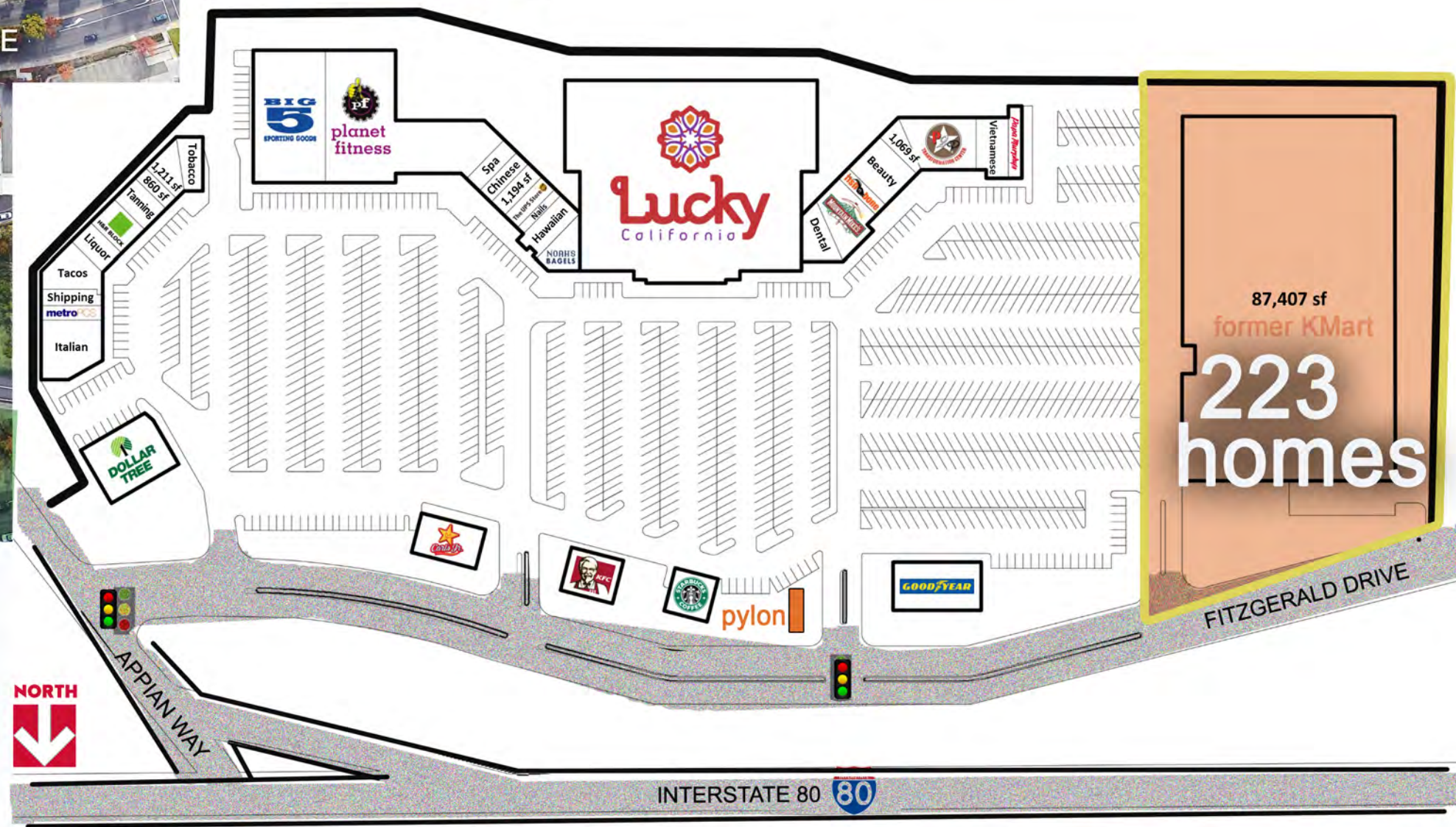


223
homes



1
PHASE
INITIAL
EXISTING

This opportunity can transform an undersused and outdated retail space on 5 acres of land into a vibrant and vital space for 223 homes.



87,407 sf
former KMart
223
homes

In seamlessly adding 223 residential homes in an area that was underused and outdated, a community can be created to take advantage of close freeway access, neighborhood amenities such as Food, Cafes, Health and personal services.



FITZGERALD DRIVE





Photos A and B show how the newly completed construction of Phase One of ROIC's program for densification blends in with the existing neighborhood and becomes part of a community streetscape. This provides 185 homes for Seniors on a previously underused part of the property.
THIS IS NEW PHASE 2





**224 APARTMENTS
+ 14.5K SF OF RETAIL**

Crossroads
BELLEVUE

**PHASE
TWO**²



- PHASE 1** added 185 senior housing residences completed 2020
- PHASE 2** adds 224 apartments with parking on-site
- Creates 14.5 K s.f. ground floor retail
- Expansion of existing park connected to Public Park
- The Project's Redevelopment Agreement was recently executed by the Bellevue City Council and Design Review Comments are expected early Fall 2021
- Construction to start late 2022





the neighborhood



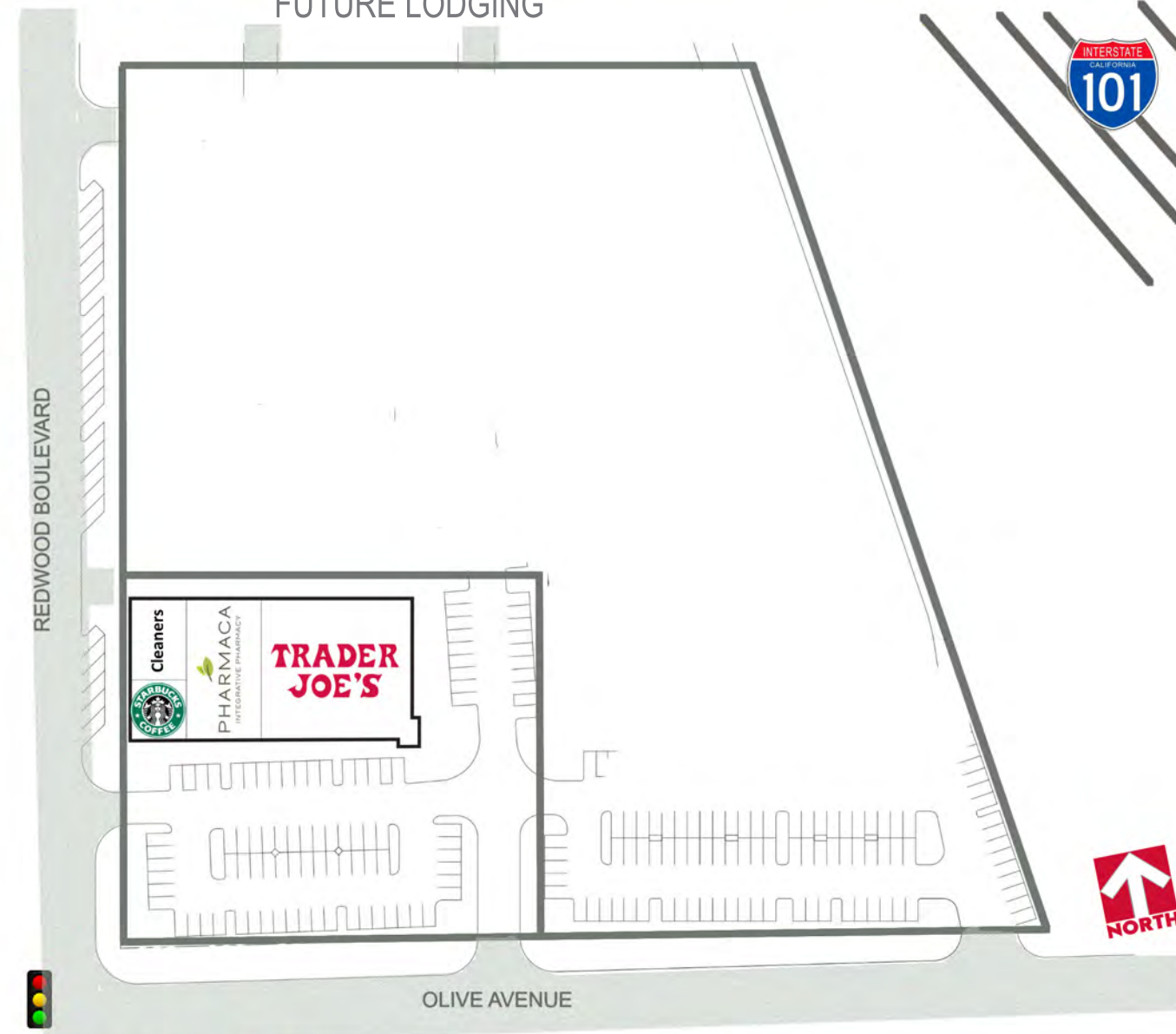
the existing retail shops and market

The Village at NOVATO

1 PHASE INITIAL EXISTING

An opportunity is available on 6 empty acres surrounding a small successful commercial property to create a new neighborhood of 173 homes, combined with 15,000 sf. of community retail, cafes, health and personal services. ROIC controls both, so all will be compatible.

FUTURE LODGING



SITE PLAN



A NEW COMMUNITY can be created from an underused 6 acre property now available to add 178 homes in an established neighborhood, while adding approximately 15K sf. within ground floor one story street fronts and patios with cafes, personal services and residences above. All contribute to the Village ambience.

