

## **BLUE FOLDER ITEM**

*Blue folder items are additional back up material to administrative reports and/or public comments received after the printing and distribution of the agenda packet for receive and file.*

### **CITY COUNCIL MEETING October 5, 2021**

**L.1. PUBLIC HEARING FOR CONSIDERATION OF THE CITY OF REDONDO BEACH  
6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN  
AND CERTIFICATION OF AN INITIAL STUDY/NEGATIVE DECLARATION**

ADOPT BY TITLE ONLY RESOLUTION NO. CC-2110-095, A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF REDONDO BEACH, CALIFORNIA, ADOPTING THE CITY'S 6TH CYCLE 2021-2029 DRAFT HOUSING ELEMENT OF THE GENERAL PLAN AND ASSOCIATED CALIFORNIA ENVIRONMENTAL QUALITY ACT DOCUMENTATION, INITIAL STUDY/NEGATIVE DECLARATION

**CONTACT: BRANDY FORBES, COMMUNITY DEVELOPMENT DIRECTOR**

- Public written comments received after release of agenda

**From:** JAMES LIGHT

**Sent:** Monday, October 4, 2021 10:52 AM

**To:** Eleanor Manzano <[Eleanor.Manzano@redondo.org](mailto:Eleanor.Manzano@redondo.org)>; Bill Brand <[Bill.Brand@redondo.org](mailto:Bill.Brand@redondo.org)>; Nils Nehrenheim <[Nils.Nehrenheim@redondo.org](mailto:Nils.Nehrenheim@redondo.org)>; Todd Loewenstein <[Todd.Loewenstein@redondo.org](mailto:Todd.Loewenstein@redondo.org)>; Zein Obagi <[Zein.Obagi@redondo.org](mailto:Zein.Obagi@redondo.org)>; Angel Frank <[fangel@angellaw.com](mailto:fangel@angellaw.com)>

**Subject:** Comments on 5 Oct 21 City Council Agenda Item L1

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

The negative declaration included in City Council Agenda L1 related to the approval of the new Housing Element relies on two flawed/inaccurate conclusions. I request the City Council REJECT that the Initial Study/Negative Declaration as currently written and send the document back to be rewritten.

The negative declaration relies on two inaccurate and flawed conclusions:

- 1) That the Housing Element is only a policy document and therefore does not require CEQA analysis. When this conclusion is used, the negative declaration states an analysis will be completed in conjunction with the approval of the PlanRedondo general plan revisions.
- 2) That the Housing Element does not create changes that impact certain analysis elements and that any analyses would be accomplished in conjunction with each specific project.

The first conclusion is inaccurate. A zoning change that changes land uses is certainly a policy document that is subject to CEQA evaluation. The document is discretionary, in that the contents are subject to the approval of the City Council. And the document foreseeably drives environmental impacts. Using this as an excuse to avoid analysis is in conflict with CEQA.

I agree that the Housing Element is but one element of the broader General Plan and that the General Plan and Housing Element must be in congruence. To that extent, and to the extent the General Plan is still a work in progress, I support deferring the analysis to the EIR to be conducted for the General Plan. The document should be modified to remove the flawed/inaccurate conclusions that policy documents are not subject to CEQA analyses.

The second conclusion is even worse. It intends to defer CEQA analysis to individual projects to avoid analysis of land use changes made by the City. CEQA does not allow such deferral and it is a slippery slope for Redondo to document this as an excuse for avoiding a required CEQA analysis of impacts. The City could easily then state that CEQA analysis of the upcoming General Plan changes could be deferred to specific projects. This excuse does not meet the requirements of CEQA. Land use changes are a discretionary act by the City and they can foreseeably drive environmental impacts. Deferring to specific project would avoid the analysis of the foreseeable cumulative impacts of all the proposed zoning land use changes. CEQA's intent is that the public understands the potential impacts of changes proposed by a City. Furthermore, the City regularly relies on the zoning change EIR when approving specific projects. Absent this zoning change EIR analysis, the specific project evaluation cannot be determined to be within the scope of the zoning change EIR. The document should be revised wherever this flawed, inaccurate conclusion is used.

I request the City Council reject the document as written and request it be rewritten to reflect the

Housing Element is one portion of the broader General Plan change and that zoning/land use change environmental impacts will be analyzed as part of the PlanRedondo General Plan update process.

VR

Jim Light  
District 1, Redondo Beach  
Sent from my iPad

**From:** JAMES LIGHT

**Sent:** Monday, October 4, 2021 3:39 PM

**To:** Eleanor Manzano <[Eleanor.Manzano@redondo.org](mailto:Eleanor.Manzano@redondo.org)>; Bill Brand <[Bill.Brand@redondo.org](mailto:Bill.Brand@redondo.org)>; Todd Loewenstein <[Todd.Loewenstein@redondo.org](mailto:Todd.Loewenstein@redondo.org)>; Zein Obagi <[Zein.Obagi@redondo.org](mailto:Zein.Obagi@redondo.org)>; Nils Nehrenheim <[Nils.Nehrenheim@redondo.org](mailto:Nils.Nehrenheim@redondo.org)>

**Subject:** Additional Comment on 5 Oct 21 City Council Agenda Item L1



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Eleanor,

Please append this to my first comment on Agenda Item L1:

As an example of case law that substantiates my concerns with the Housing Element General Declaration, please see the case below and quote from the decision. There are many more examples of substantiating case law.

The negative declaration is wrong. The City cannot waive off CEQA analysis by simply stating a document is just "policy" or by deferring to a future specific project. The negative declaration should be REJECTED and the CEQA analysis should be rolled in with the PlanRedondo General Plan Amendment EIR.

VR

Jim Light  
Sent from my iPad

[City of Redlands v. County of San Bernardino \(2002\) 96 Cal.App.4th 398, at p. 409:](#)

"Not only does CEQA apply to revisions or amendments to an agency's general plan, but CEQA reaches beyond the mere changes in the language in the agency's policy to the ultimate consequences of such changes to the physical environment. A general plan embodies an agency's fundamental policy decisions to guide virtually all future growth and development. 'Even if a general plan amendment is treated merely as a "first phase" with later developments having separate approvals and environmental assessments, it is apparent that an evaluation of a "first phase-general plan amendment" must necessarily include a consideration of the larger project, i.e., the future development permitted by the amendment. Only then can the ultimate effect of the amendment upon the physical environment be addressed.'

"

**From:** Warren Chun

**Sent:** Monday, October 4, 2021 7:49 AM

**To:** CityClerk <[CityClerk@redondo.org](mailto:CityClerk@redondo.org)>; [+Horvath.RBD3@gmail.com](mailto:+Horvath.RBD3@gmail.com)

**Subject:** City Council - My public comments for L.1 Housing Element



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Good Morning Mayor Brand and City Council,

I am a 21 year resident of North Redondo Beach.

Please consider a balanced approach in the placement of the affordable housing location between South Redondo and North Redondo.

Sincerely,

Warren Chun

**From:** [redondo=comcate.com@mg.comcate.com](mailto:redondo=comcate.com@mg.comcate.com) <[redondo=comcate.com@mg.comcate.com](mailto:redondo=comcate.com@mg.comcate.com)> **On**  
**Behalf Of** City of Redondo Beach - Customer Service  
**Sent:** Monday, October 4, 2021 12:20 PM  
**To:** Melissa Villa <[Melissa.Villa@redondo.org](mailto:Melissa.Villa@redondo.org)>  
**Subject:** New Comcate Case: Mayor & Council>Public Comment on Agenda Item (you are owner)



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**Topic>Subtopic:** Mayor & Council>Public Comment on Agenda Item

Case ID#: 37819  
Case Created: 10/04/2021  
Case Location:

Customer: Guernsey,  
Owner: Melissa Villa  
Your role on this case: Primary Owner

Case Details: <https://clients.comcate.com/rep/caseDetail.php?ag=23&id=1774566>  
First 200 Characters of Case:

*This is in regards to addition of housing, as required by the State. Redondo Beach is ONE city, and in 30+ years living here (currently El Nido neighborhood in "North Redondo"), I've considered it as such. I try to be fair minded on City matters. For instance, I think it made the most sense to add the new homeless units near my neighborhood (but the NEXT ones, if any, can go in "South"), and I'm fine with 30+ new condo units being constructed on the edge of my "R1" neighborhood, and with Friendship Foundation facility planned next to Franklin Park (also in our neighborhood). But this City Council push for an unfair amount of new housing to go into "North Redondo" really disgusts me. Come on folks, stop catering to a selfish, snobbish mentality and do what's right overall. For our ONE city.*

October 5, 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 frustration about the City's 6th Cycle 2021-2029 Draft Housing Element, which I will show does not meet our city's needs nor meet the intent of federal law for Affirmatively Furthering Fair Housing (AFFH).

The point of a Housing Element is to address the current and future needs of our city. This HE falls short. No one wants more traffic. Considering Jobs-Housing fit is how we add housing without contributing to traffic.

North Redondo is a tech center, generating large numbers of high income jobs and attracting busy two-tech worker families like mine that value short commutes to work and school. Coastal South Redondo is a beach community that attracts tourists, retirees, and singles of all ages. Inland South Redondo also attracts families.

South Redondo, like many areas with tourism and retirees, is a significant generator of low income jobs. In order to meet the needs of our area employers and the essential workers that feed and care for us, we need to add housing for them. Restaurants and bars close long after transit stops running in our area. Our Lobster Festival was cancelled for lack of workers. If we want enough hospitality workers, and for them to commute without cars, we need to allow them to move close to their jobs. If they live within walking or biking distance, then our businesses can have a flexible and available workforce.

Similarly, eldercare requires early morning and late evening shifts (up to 3 shifts a day), generating huge amounts of VMT. The best way to ensure that our elderly have access to the care they need is to provide nearby housing for their caregivers. You do not want to field calls from elderly relatives, waiting anxiously in wet diapers, for their evening caregivers who are stuck in traffic or had their car break down.

The current HE puts almost all of the low-income housing at the extreme Northeast corner of the city, on the other side of the 405 Freeway. We will be providing homes for the low-income workers of other cities, not for us. This is a self-inflicted wound.

North Redondo parents are frustrated by over-crowded schools. Some drive their children to South Redondo schools to escape overcrowding. Why don't we just build more family-sized homes in South Redondo so that children can walk or bike to school? This would reduce traffic.

I have previously written to you on April 10 about how the draft element puts all the very low-income housing in the most polluted area of our city, practically on top of the 405 Freeway. Children will have to walk 1.25 miles across freeway on/off ramps on Inglewood Ave to get to school, or take a 1.5 mile roundabout way via Manhattan Beach Blvd and Redondo/Vail Aves. They will arrive at school deafened by traffic noise, dosed with air pollution, and stressed by having to cross dangerous traffic. This is not AFFH.

The HE would put all of the low income children at Adams MS, which already has twice the percentage of low-income children as Parras MS. I highlighted the schools where the children in the North Tech site and the Galleria/Kingsdale sites would attend. Washington ES is already very large and teaches a higher than average proportion of low-income children. This is not AFFH.

AFFH applies within our city. Fortunately, our most segregated schools are the least crowded; they need to attract students outside their area (generating traffic). One third of our morning traffic is school drop-off. Putting new housing in South Redondo would help reduce this source of traffic.

#### **Current RBUSD student demographics**

<b>School</b>	<b>Zip Code</b>	<b>Student Pop</b>	<b>% Low Income</b>	<b>% White</b>	<b>% Hispanic</b>	<b>% Black</b>	<b>% Asian</b>	<b>% 2 or more</b>
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

Justice and the law requires that we balance the benefits and burden of new residents to improve the lives of our new residents. By the way, research and evidence shows that children



who attend racially and economically integrated schools have the best outcomes. Sharing classrooms with low-income students will benefit students from high income backgrounds.

In following the spirit and the letter of AFFH by spreading new housing throughout the city, we would help existing residents and businesses. We would offer students to keep schools open, caretakers for our elderly and young, workers for our businesses. We could do this without worsening car traffic if we do some smart things.

HCD's September 2, 2021 letter to the city mentioned several administrative things we should correct.

Why do we require fees of \$18,902 for new Single Family Homes and a whopping \$29,612 for higher density homes? That backwards. SFHs are the most costly for the city to serve. The fee structure is backwards.



Why do we have such low height limits when we have old taller buildings throughout the city? They are fine. We should remove the 30'/38' height limits so we can increase housing capacity. This will help reduce costs per unit and make elevator buildings more affordable for seniors. In the last decade, elevators have halved their energy use by incorporating AI and coupling regenerative braking with backup batteries. This makes such buildings attractive for medically-fragile residents who need backup power.

Advances in Cross-Laminated Timber (CLT) have enabled construction of strong and beautiful mid-rise buildings around the world, even in earthquake zones). (Wood sequesters carbon while concrete parking structures produce it.)

We should allow recycling of multi-family as well as SFHs throughout the city. CLT can be used for mid-rise buildings of up to ~11 stories. So let's replace asbestos and lead-laden 50-70 year-old buildings with beautiful new ADA-compliant and energy-efficient homes.

Lastly, we need to do something about parking. So many people complain about parking, and we are ourselves the cause of the problem.

We require anomalously high amounts of parking per unit. We require 2 off-street resident parking spaces regardless of size or income level. Then we require another 0.5 visitor spots per unit. We know that larger families tend to have more cars. There is no reason why studios need to have 2 parking spaces except to artificially inflate the cost.

Low income households in LA County have 0-1 cars. Seniors have fewer cars. The data shows that requiring parking raises housing costs and encourages people to buy more cars. Parking minimums induce demand for cars. We want to provide homes for people, not attract more cars to our city.

Grace Peng, PhD