



**CITY OF MANHATTAN BEACH  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
STAFF REPORT**

**DATE:** January 12, 2022

**TO:** Planning Commission

**FROM:** Carrie Tai, AICP, Director of Community Development

**THROUGH:** Talyn Mirzakhanian, Planning Manager

**SUBJECT:** Consideration of the 6th Cycle Housing Element Update and associated Initial Study/Negative Declaration

**BACKGROUND**

All jurisdictions in the Southern California Association of Governments (SCAG) region are required to update their General Plan Housing Element for the 2021-2029 planning period (the 6th cycle) by October 2021, albeit with a 120-day grace period. The Housing Element is one of the State-mandated parts (elements) of a General Plan. State law requires that jurisdictions update the Housing Element every eight years. The State Department of Housing and Community Development (HCD) must approve each Housing Element update. The Housing Element describes the City's needs, goals, policies, objectives, and programs regarding the preservation, improvement, and development of housing within the City. The Housing Element analyzes community housing needs in terms of affordability, availability, adequacy and accessibility, and describes the City's strategy and programs to address those needs.

Prior to each eight-year planning period, SCAG prescribes to each municipality in their jurisdictional region the number of additional housing units necessary at different income levels in order for each municipality to accommodate their fair share of anticipated population growth during that planning period. This allocation is known as the Regional Housing Needs Assessment (RHNA) allocation. The income levels for all jurisdictions within Los Angeles County, as specified in the RHNA allocation, are based upon the Area Median Income (AMI) of a 4-

person household and determined annually by the U.S. Department of Housing and Urban Development (HUD) and the California HCD. The RHNA allocation is derived from the Statewide allocation; given the current status of the housing crisis in the State, the Statewide allocation is fairly high this cycle. SCAG released the final allocations on March 4, 2021. The RHNA allocation for Manhattan Beach is 774 units and is broken down by household income level as follows:

- Very-Low Income (50% of Area Median Income) 322 units
- Low Income (80% of Area Median Income) 165 units
- Moderate Income (100% of Area Median Income) 155 units
- Above-Moderate Income (120% of Area Median Income) 132 units

Through the Housing Element Update (HEU), the City must demonstrate that Citywide zoning and General Plan designations could accommodate the number of housing units allocated to each income level category, including identifying sites where development is allowed. Neither the City, County, nor private landowners are required by the Housing Element to build the number of units, as the Housing Element's goal is to that ensure realistic capacity is available for housing development.

Cities that fail to update their Housing Element by the deadline run the risk of litigation and losing the authority to issue residential and non-residential permits. Repercussions also include ineligibility for grant funding. Manhattan Beach intends to remain compliant to avoid these costly and undesired consequences. To remain compliant, the HEU must be adopted by the City Council no later than February 12, 2022.

In July 2021, staff initiated the drafting process, which involved significant research, coordination, and review of existing regulations and sites. Significant public outreach was conducted by way of study sessions and workshops with the Planning Commission and City Council, all of which are detailed in the Public Outreach section of this report. The result of this effort was the production of the Draft Housing Element. On October 15, 2021, staff submitted the Draft Housing Element to HCD for review; and on October 20, 2021, the Draft Housing Element was released for public review on the City's website to conform to the 30-day requisite public review period. On December 14, 2021, HCD issued a letter to the City (Attachment 5) requesting some revisions to the document and clarification on certain discussion items. Staff also received four public comments in response to the Draft Housing Element. All comments were addressed in the final Housing Element (Attachment 3). Subsequent to adoption of the final Housing Element by the City Council, the document will be resubmitted to HCD for certification. In accordance with the California Environmental Quality Act (CEQA), an Initial Study/Negative Declaration (IS/ND) was prepared to support the HEU;

details regarding the CEQA process are documented in the Environmental Review section of this report.

## DISCUSSION

The HEU, as reviewed by HCD, was prepared in accordance with State requirements, and as such, is organized into the following sections:

- **Introduction** provides an overview of the Housing Element, its relationship to State law, the City's Regional Housing Needs Assessment (RHNA), and a discussion on how the document is organized.
- **Public Engagement** describes the outreach process that was undertaken through the Housing Element update process, and the input received that informed the development of this plan.
- **General Plan Consistency** details those policies identified throughout the elements of the General Plan that guided the policies set forth in the Housing Element to ensure that consistency is maintained throughout the General Plan.
- **Goals and Policies** specifies the City's plans for meeting the existing and projected comprehensive housing needs of Manhattan Beach.
- **Program Implementation** identifies the specific actions that will be implemented to ensure that Manhattan Beach's housing needs are met within the planning period.

Supporting documentation is included as appendices to the Housing Element. These include the following:

**Appendix A - 5th Cycle Review** evaluates the efficacy of the 5th Cycle housing element; the progress in plan implementation; and the appropriateness of the goals, policies, and programs.

**Appendix B - Needs Assessment** provides a community profile assessing the housing need through detailed information on Manhattan Beach's demographic characteristics and trends that influence supply and demand of various housing types.

**Appendix C - Constraints and Zoning Analysis** details governmental and non-governmental constraints to the maintenance, improvement, or development of housing for all income levels.

**Appendix D - Affirmatively Further Fair Housing Analysis** identifies disproportionate housing needs, including segregated living patterns, concentrated areas of poverty, disparities in access to opportunity, and displacement risk in accordance with the requirements of Assembly Bill 686.

**Appendix E - Sites Analysis and Inventory** describes the methodology by which the City can accommodate its RHNA targets and provides an inventory of the sites identified to meet the housing need.

**Appendix F - Community Engagement Summary and Results** provides the detailed results of the outreach conducted for the HEU.

This discussion focuses on the Program Implementation section of the Housing Element, as well as the Sites Analysis and Inventory included as Appendix E.

The Program Implementation section of the Housing Element, identifies 31 programs that will be implemented during the 6th cycle planning period to ensure that the City's housing needs are met and to set the goals and policies in motion. While some of the 31 programs have been carried forward from the 5th cycle Housing Element, others have stemmed from new State requirements applicable to 6th cycle Housing Elements. A selection of noteworthy, new programs are highlighted below:

***Program 1: Accessory Dwelling Unit Program*** Under Assembly Bill (AB) 671, local agencies must include a plan in its housing element to incentivize and promote the creation of ADUs that can be offered at affordable rent for very low-, low-, or moderate-income households. The City will develop a method and process to incentivize the production of JADUs and ADUs affordable to a range lower-income households.

***Program 2: Adequate Sites*** The City will establish an overlay district that encompasses a minimum of 20.3 acres of sites in the General Commercial (CG) and Planned Development (PD) Districts to accommodate the lower-income RHNA allocation. An overlay district allows for creation of housing on properties in addition to allowances of the existing zoning, increasing development opportunities.

***Program 3: Affordable Housing Streamlining*** In addition to the City's existing streamlined processes, the City will revise internal permitting procedures to ensure that staff has clear procedures for responding to proposals for Senate Bill (SB) 35 streamlining and for prioritizing qualifying SB 35 housing developments consistent with State law.

***Program 12: Developer Outreach and Transparency*** Pursuant to Assembly Bill (AB) 1483, the City will actively work with the development community to identify ways that lower income housing may be provided. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low income, very low income, and low - income households.

***Program 22: Parking Reductions*** Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing. Pursuant to Assembly Bill (AB) 1851, the City will revise the Municipal Code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development. Separately, the City will conduct a parking study to identify opportunities for additional parking reductions for residential multifamily housing outside of the Coastal Zone.

***Program 19: Preserving Housing Capacity*** Section 10.52.050.F of the Municipal Code currently allows property owners in residential zones to develop contiguous separate lots as one site without requiring a lot merger, with only detached accessory structure(s) on one or more of the lots, which includes guest houses, garages and parking areas, and pools and spas. This presents property owners with the opportunity to buy adjacent lots with existing unit(s) for the purpose of demolishing the unit(s) and developing only detached accessory structure(s), ultimately reducing the City's overall housing stock. To mitigate the loss of dwelling units through demolition and to conserve the existing housing stock, the City will amend the Municipal Code to eliminate provisions allowed in Section 10.52.050.F.

***Program 26: Replacement Requirements*** Pursuant to SB 330, the City will mandate replacement requirements on sites identified in the Sites Inventory and consistent with the Housing Crisis Act of 2019 for proposed housing developments on sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that were restricted for lower income households. The City will consider re-evaluation of this program upon sunset of this State requirement, currently scheduled for 2030.

***Program 28: Specialized Housing Types to Assist Persons with Special Needs*** The City will amend the Municipal Code to comply with current State laws applicable to specialized housing types, including but not limited to supportive housing (AB 2162), emergency shelters (AB 139), and low-barrier navigation centers (AB 101) and facilities classified as Residential Care, General.

For each of the 31 identified programs, the Program Implementation section, as required by HCD, specifies a timeframe, the responsible agency, and the funding source. State law also requires the City to report to HCD the progress on each of these programs via the Annual Housing Element Progress Report.

The **Sites Analysis and Inventory**, or Appendix E, of the 6th Cycle Housing Element, describes the City's housing target for the 6th Cycle planning period, provides an overview of methodology for identifying underutilized sites, breaks down the methodology by which realistic development capacity was determined, identifies existing capacity for all RHNA income categories, evaluates development that is currently underway (which counts towards the City's housing need), details the expected number of ADUs to be developed within the planning period, and summarizes the approach utilized for the identification of sites selected for the Adequate Sites Program of the Housing Element.

As mentioned previously, the City's RHNA allocation includes a total of 774 units, with a requirement to plan for 322 units for very-low-income households, 165 units for low-income households, 155 units for moderate-income households, and 132 units for above-moderate-income households. The Sites Analysis for the 2021-2029 planning period has identified capacity for 377 total units through underutilized sites, projected ADUs, and pipeline projects, which are expected to receive Certificates of Occupancy within the planning period. As demonstrated in Table 13 of Appendix E, the City has identified an adequate supply of land to accommodate the moderate-income and above moderate-income RHNA allocation, respectively, therefore, the City is not required to create new opportunities for those income categories. However, as also demonstrated in Table 13 of Appendix E, the City can realistically accommodate only 81 of the 487 lower-income units through underutilized sites, projected ADUs, and pipeline projects.

To meet the remaining RHNA for lower-income units, the City is required to commit to *Program 2, Adequate Sites*, of the Housing Element, and has identified areas to increase capacity in the City to meet the lower-income housing need by establishing an overlay district that encompasses a minimum of 20.3 acres of sites in the CG and PD Districts, creating the opportunity for at least 406 units of housing appropriate to accommodate lower-income households. Separately from Program 2, the City will also rezone a selection of residential sites to allow for the development of higher density, lower-income residential units. All sites identified as opportunity sites for the overlay and rezoning efforts are listed in Table 15 and Table 16 of Appendix E. The combined overlay and rezoning efforts will accommodate the lower-income RHNA requirement and a buffer of at least 15% of the lower-income allocation (approximately 73 units) as recommended by HCD, to ensure sufficient capacity exists to accommodate the RHNA throughout the planning period and to comply with the provisions of SB 166.

Subsequent to the adoption of the HEU, staff will commence all implementation efforts outlined in the Programs section of the HEU within the timeframes certified by HCD. The major effort will focus on the creation of the overlay and the required rezoning, during which development standards, including height, setback, etc., will need to be generated.

## **PUBLIC OUTREACH**

As required by Government Code Section 65583(c)(9), local governments have to demonstrate a diligent effort to achieve public participation of all economic segments of the community in their development of the Housing Element. Accordingly, below is a summary of the public outreach involved in this effort.

On August 24, 2021, staff presented the City Council with an introductory presentation to the Housing Element update effort, providing a general timeline of the steps involved. Staff fielded several questions from Councilmembers.

On August 31, 2021, the City hosted a virtual stakeholder's workshop. Attendees participated in polls, discussion, and a question-and-answer session. In their responses to poll questions, stakeholders identified the lack of available land and the cost of development as barriers to housing production. They indicated that increased opportunities for mixed-use projects and increased density along commercial corridors would be the best solutions for accommodating the City's housing needs. Furthermore, stakeholders identified diversity in housing stock and general housing affordability in the City as the top unmet housing needs; whereas, others stated they do not feel there are unmet housing needs in the City.

On September 15, 2021, the Planning Commission conducted a study session to discuss this effort. Following a presentation from staff, the open forum discussion focused mainly on the sites inventory and potential opportunities for additional capacity. During this session, commenters suggested that staff explore opportunities for additional capacity for the lower income units along Aviation Boulevard, Manhattan Beach Boulevard, and Rosecrans Avenue. There was general concern expressed regarding utilizing underutilized sites in the CG zone for a majority of the capacity necessary. Other comments included exploring allowing duplexes and triplexes in certain single-family neighborhoods, or allowing more accessory dwelling units (ADUs) than allowed by State law.

On September 21, 2021, at a regularly scheduled City Council meeting, staff presented a progress report to City Council, debriefed on key discussion points from the September 15 Planning Commission study session, fielded questions, and received input.

On Saturday, October 2, 2021, at the City's Hometown Fair, Planning staff disseminated flyers advertising the upcoming public review period for the Draft 6th cycle Housing Element and engaged with the public.

On October 20, 2021, the Draft 6th cycle Housing Element was made available for public review; staff accepted public comments on the document until November 30, 2021. Furthermore, pursuant to the California Environmental Quality Act (CEQA), the Initial Study/Negative Declaration was circulated for public review on November 24, 2021, with the comment period ending on December 27, 2021.

On November 2, 2021, staff presented another progress report on the Draft 6th cycle Housing Element to City Council at a regularly scheduled City Council meeting, with the main goals being to assist the City Council and the public in navigating through the draft document, and to provide an updated discussion on key components of the document.

On December 8, 2021, staff presented the Draft 6th cycle Housing Element to the Planning Commission at a regularly scheduled meeting, with the main goals being to assist the Planning Commission and the public in navigating through the draft document, and to provide an updated discussion on key components of the document.

Finally, the Planning Commission is considering their formal recommendation on the adoption of the 6th Cycle Housing Element and the associated Initial Study/Negative Declaration at a duly noticed public hearing on January 12, 2022; with the subsequent City Council public hearing for adoption scheduled for February 1, 2022. The deadline for City Council adoption of the document is February 12, 2022.

The noticing related to these workshops, study sessions and public hearings consists of ads and postings in the Beach Reporter, on the City's website, and on the City's various social media platforms, including Twitter, Facebook and Instagram. For each event, the content was displayed on the various social media platforms on average over 21,000 instances, reaching on average over 11,200 individuals. Additionally, staff has compiled a list of stakeholders and interested parties and directly reaches out to these individuals with notices for each meeting.

## **ENVIRONMENTAL REVIEW**

The update to the 6th cycle Housing Element is subject to the California Environmental Quality Act (CEQA). Accordingly, an Initial Study (IS) was prepared for the project. As described in the preceding sections of this report, the HEU conceptualizes how the City will provide the capacity for a total of 774 housing units, as assigned by SCAG during the 6th Cycle RNHA, during the period of 2021 through 2029. Again, under existing conditions, the City has the capacity to accommodate 377 dwelling units; as such, the City was required to identify how it



will provide the capacity for an additional 479 dwelling units (406 units plus an additional buffer of 73 units). The analysis in the IS addresses the potential physical impacts associated with implementation of the HEU, which includes programs that conceptualize how the City will ultimately provide the capacity for these additional 479 dwelling units. Note that no development is currently proposed, and future rezoning efforts will undergo environmental review independent of this analysis.

Based on the initial analysis in the IS, a determination was made that the proposed project (the adoption of the policy document) could not have a significant effect on the environment. Therefore, a Negative Declaration (ND) was prepared accordance with Section 15070-15075 of the CEQA Guidelines.

A Notice of Completion (NOC) and Notice of Intent (NOI) to Adopt a Negative Declaration were filed with the Los Angeles County Clerk and the State Clearinghouse on November 24, 2021. These initiated the circulation of the document for public review, with the public review period ending on December 27, 2021. One public comment was received from Caltrans. The comment and staff's response to the comment are incorporated into the Final ND document provided as Attachment 4.

## RECOMMENDATION

Staff recommends that the Planning Commission adopt Resolution No. PC 22-01 (Attachment 1) recommending adoption of the Negative Declaration for the 6th Cycle Housing Element to the City Council; and adopt Resolution No. PC 22-02 (Attachment 2), recommending adoption of the 6th Cycle Housing Element to the City Council.

## ATTACHMENTS

1. Resolution recommending adoption of the Negative Declaration for the 6th Cycle Housing Element
2. Resolution recommending adoption of the 6th Cycle Housing Element
3. Final 6th Cycle Housing Element (*with redlines*)
4. Final Negative Declaration
5. December 14, 2021 Letter from HCD

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# ATTACHMENT 1

## RESOLUTION NO. PC 22-01

### A RESOLUTION OF THE MANHATTAN BEACH PLANNING COMMISSION RECOMMENDING TO THE CITY COUNCIL ADOPTION OF A NEGATIVE DECLARATION FOR AN AMENDMENT TO THE HOUSING ELEMENT OF THE MANHATTAN BEACH GENERAL PLAN, AND ADOPTION OF FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

#### THE MANHATTAN BEACH PLANNING COMMISSION HEREBY FINDS, DETERMINES AND RESOLVES AS FOLLOWS:

Section 1. The Housing Element is one of the State-mandated elements of a General Plan. State law requires that jurisdictions update the Housing Element every eight years. All jurisdictions in the Southern California Association of Governments (SCAG) region are required to update their General Plan Housing Element for the 2021-2029 planning period (the 6th cycle) by October 2021, albeit with a 120-day grace period. This project proposes an update to the City of Manhattan Beach General Plan Housing Element (“the Project”) in accordance with Sections 65580 – 65589.11 of California Government Code.

Section 2. The City commissioned Dudek Consultants to prepare an Initial Study/Negative Declaration (the “IS/ND”) in accordance with the California Environmental Quality Act (“CEQA”) (Pub. Resources Code § 21000, et seq.) and the CEQA Guidelines (14 C.C.R. §15000 et seq.). The IS/ND is hereby incorporated by reference. The IS/ND evaluated the environmental impacts of the policy document and determined that the Project could not have a significant effect on the environment. More specifically, the Initial Study concluded that there is no substantial evidence that significant impacts would occur to the following issue areas: Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. City staff independently evaluated and concurred with the findings of the consultant.

Section 3. On November 24, 2021, pursuant to CEQA Guidelines Sections 15072, the City released a Notice of Intent (NOI) to Adopt a Negative Declaration.

Section 4. On November 24, 2021, pursuant to CEQA Guidelines Sections 15073, the City filed a Notice of Completion (“NOC”) with the Los Angeles County Clerk and the State Clearinghouse, indicating that an Initial Study/Negative Declaration had been prepared, and initiating the circulation of the IS/ND for public review for a comment period that commenced on November 24, 2021 and concluded on December 27, 2021.

Section 5. A total of one public comment was received in response to the IS/ND. The City prepared written responses to all comments received.

Section 6. On January, 12, 2022, the City’s Planning Commission held a duly noticed public hearing to consider the IS/ND and the Project, during which the Planning Commission received a presentation by staff and testimony from members of the public. The Planning Commission also received and reviewed written testimony received by the City prior to the public hearing.

Section 7. The Planning Commission hereby finds in the exercise of its independent judgment that the conclusions in the IS/ND are correct and the analysis was completed in full compliance with CEQA.

Section 8. The findings made in this Resolution are based upon the information and evidence set forth in the IS/ND, upon other substantial evidence that has been presented at the hearings before the Planning Commission, and in the record of the proceedings. The documents, staff reports, technical studies, appendices, specifications, and other materials that constitute the record of proceedings on which this Resolution is based are on file for public examination during normal business hours at the City of Manhattan Beach, 1400 Highland Avenue, Manhattan Beach, CA 90266 and available on the City’s website at all times. Each of those documents is incorporated herein by reference, and included as “Exhibit A”.

Section 9. The Planning Commission hereby finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the IS/ND and the Project.

Section 10. The Planning Commission hereby certifies that prior to taking action, the Planning Commission reviewed and considered the IS/ND and all of the information and data in the administrative record, and all oral and written testimony presented to it during meetings and hearings, certifies that the IS/ND reflects the City’s independent judgment and analysis, is adequate and was prepared in full compliance with CEQA, and that the project will not have a significant effect on the environment. No comments or any additional information submitted to the City, including but not limited to the evidence and legal argument presented on January 12, 2022, have produced any substantial new information requiring recirculation or additional environmental review of the Project under CEQA.

Section 11. The Planning Commission hereby recommends to the City Council adoption of the Initial Study/Negative Declaration and associated findings pursuant to the California Environmental Quality Act as set forth herein.

Section 12. The Secretary of the Planning Commission shall certify to the adoption of this Resolution and shall make this resolution readily available for public inspection.

January 12, 2022

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Planning Commission Chair

I hereby certify that the following is a full, true, and correct copy of the Resolution as **ADOPTED** by the Planning Commission at its regular meeting on **January 12, 2022** and that said Resolution was adopted by the following vote:

**AYES:**

**NOES:**

**ABSTAIN:**

**ABSENT:**

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**Carrie Tai, AICP,**  
Secretary to the Planning Commission

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**Rosemary Lackow,** Recording Secretary

**EXHIBITS**

Exhibit A: Final Initial Study/Negative Declaration

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Final Negative Declaration

# **City of Manhattan Beach General Plan Amendment: 6th Cycle Housing Element Update**

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**JANUARY 2022**

*Prepared for:*

**CITY OF MANHATTAN BEACH**

1400 Highland Avenue

Manhattan Beach, California 90266

*Contact: Talyn Mirzakhonian, Planning Manager*

*Prepared by:*

**DUDEK**

38 North Marengo Avenue  
Pasadena, California 91101

*Contact: Nicole Cobleigh*



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**ATTACHMENTS**

A Notice of Intent Comment Letter

# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADU	Accessory Dwelling Unit
AMI	Area Median Income
BMP	Best Management Practice
CAA	Clean Air Act
CalGEM	California Geology Energy Management Division
CARB	California Air Resources Board
CBC	California Building Code
CCA	California Coastal Act
CCC	California Coastal Commission
CDBG	Community Development Block Grant
CDOC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CGS	California Geologic Society
City	City of Manhattan Beach
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CWA	Clean Water Act
DACs	Disadvantaged Communities
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transportation Administration
GHG	Greenhouse Gas
GPA	General Plan Amendment
HCD	Housing and Community Development
HCP	Habitat Conservation Plan
HEU	Housing Element Update
HRC	Housing Rights Center
IS	Initial Study
JADU	Junior Accessory Dwelling Unit
LACDPW	Los Angeles County Department of Public Works
LCP	Local Coastal Program
LOS	Level of Service

Acronym/Abbreviation	Definition
MBTA	Migratory Bird Treaty Act
MBUSD	Manhattan Beach Unified School District
MTA	Los Angeles County Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWELO	Model Water Efficient Landscape Ordinance
NAHC	Native American Heritage Commission
NRCS	Natural Resources Conservation Service
ND	Negative Declaration
NPDES	National Pollution Discharge Elimination System
OPR	Governor’s Office of Planning and Research
PCH	Pacific Coast Highway
PD	Planned Development District
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SB	Senate Bill
SBCCPOG	South Bay Cities Council of Governments
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SMARA	Surface Mining and Reclamation Act of 1975
SWPPP	Stormwater Pollution Prevention Plans
SWRCB	State Water Resources Control Board
TCAC	California Tax Credit Allocation Committee
TCR	Tribal Cultural Resource
TDSP	Transit District Specific Plan
TMDL	Total Maximum Daily Load
USDA	United States Department of Agriculture
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
WBMWD	West Basin Municipal Water District
WSAP	Water Supply Allocation Plan
WSCP	Water Shortage Contingency Plan

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# 1 Introduction

## 1.1 Project Overview

The purpose of the Housing Element Update (HEU) is to provide an update to the Housing Element of the City of Manhattan Beach's (City's) General Plan. The intent of the HEU is to address the comprehensive housing needs of the City. State law requires jurisdictions to update their Housing Element every eight years to outline their existing and projected housing needs, to discuss barriers to providing that housing, and to propose actions to address housing needs and barriers. The programs proposed in the HEU are intended to be implemented over an eight-year planning horizon (2021-2029).

## 1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA), a statewide environmental law described in California Public Resources Code, Sections 21000 *et seq.*, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

The City's Community Development Department directed and supervised the preparation of this Initial Study (IS)/ Negative Declaration (ND). Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this IS/ND reflect the independent judgment of the City. The IS/ND was made available for public review between November 24, 2021 and December 27, 2021.

## 1.3 Project Planning Setting

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the project.

For this IS/ND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the project.

The IS/ND was made available for public review between November 24, 2021 and December 27, 2021. One comment letter was received from the California Department of Transportation on December 17, 2021 (Attachment A, Notice of Intent Comment Letter). No revisions to the IS/ND are required in response to public comments received during the circulation of the Draft IS/ND.

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## 2 Project Description

The HEU proposes an update to the City of Manhattan Beach’s (City’s) General Plan. Under the HEU, the General Plan would be amended with updates to the Housing Element, as detailed below.

### 2.1 Background

Since 1969, the State of California has required all local governments to adequately plan to meet the housing needs of everyone in the community. California’s local governments meet this requirement by adopting housing plans as part of their “general plan.” The law mandating that housing be included as an element of each jurisdiction’s general plan is known as “housing-element law.”

The HEU represents the City’s effort in fulfilling the requirements under State Housing Element law. The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the State’s major housing goal. Recognizing the important role of local planning and housing programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of the comprehensive General Plan.

Pursuant to State law, the Housing Element must be updated periodically according to statutory deadlines. The proposed Housing Element Update (HEU) covers the planning period of October 15, 2021 to October 15, 2029.

State Law requires that the Housing Element include the following components:

- An evaluation of the efficacy of the previous Housing Element’s progress in plan implementation and appropriateness of the goals, policies, and programs.
- An analysis of the City’s population, household, and employment base, and the characteristics of the housing stock.
- A summary of the present and projected housing needs of the City’s households.
- A review of potential constraints to meeting the City’s identified housing needs.
- An evaluation of Fair Housing to identify disproportionate housing needs.
- A statement of the Housing Plan to address the identified housing needs, including housing goals, policies, objectives, and programs.

The City’s Housing Element is being updated at this time in conformance with the 2021-2029 update cycle for jurisdictions in the Southern California Association of Governments (SCAG) region. The HEU builds upon the other General Plan elements and is consistent with the policies set forth by the General Plan, as amended. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.

### 2.2 Regional Housing Needs Assessment (RHNA)

The California Department of Housing and Community Development (HCD) is required to prepare a Regional Housing Needs Assessment (RHNA) for each Council of Governments in the State that identifies projected residential dwelling units (“units”) needed for all economic segments based on Department of Finance population

estimates. The Southern California Association of Governments (SCAG) is the Council of Governments for Los Angeles County (County) (as well as Ventura, Riverside, Orange, San Bernardino, and Imperial Counties) and allocates to the six counties and 191 cities and the unincorporated County areas their fair share of the total RHNA housing needed for each income category. Each local government must demonstrate that it has planned to accommodate all of its regional housing need allocation in its Housing Element. The City has been assigned a 6th Cycle RHNA allocation (RHNA allocation) of 774 units for the 2021–2029 Housing Element (proposed Housing Element), broken down as follows: 487 lower income units, 155 moderate income units, and 132 above-moderate income units . In addition to accommodating the RHNA allocation, the City will provide sites with the capacity to accommodate an additional 73 units to comply with the lower-income “buffer” requirement ensuring that enough capacity remains throughout proposed Housing Element’s eight year planning period to provide adequate housing.<sup>1</sup>

Because the City does not have large swaths of land available for development, there are no opportunities to identify new housing capacity on undeveloped lands. With no vacant sites, the City’s housing capacity is identified in the form of underutilized sites that are most suitable for redevelopment. To accommodate the RHNA allocated 774 units and the 73 lower-income buffer units (buffer units), the City prepared an analysis and inventory of sites within City limits that are suitable for residential development during the planning period (Program 2, Adequate Sites). After calculating the City’s current capacity via the sites analysis, the City determined there was existing capacity to accommodate a total of 377 units (including lower-, moderate-, and above-moderate-income units). However, the City also determined that there exists a shortfall of 406 units for the lower-income RHNA category, plus the need to accommodate an additional 73 unit lower-income buffer, for a collective shortfall of 479 units.

To accommodate the remaining lower-income RHNA allocation, the City has identified potential sites to be made available to accommodate residential uses appropriate for lower-income households within three years and 120 days from the beginning of the proposed Housing Element’s eight-year planning period, which is referred to as the Adequate Sites Program.<sup>2</sup> As proposed in Program 2 of the HEU detailed below, the City will establish an “overlay” which is a regulatory planning tool that creates places special provisions or makes particular allowances over an existing base zoning district in order to guide development within a specific area. The Adequate Sites Program 2 overlay proposed as part of the HEU would encompass approximately a minimum of 20.3 acres of the potential sites identified in Figure 2.2-1 and would permit residential uses at a minimum of 20 dwelling units per acre within the General Commercial (CG) and Planned Development (PD) districts to accommodate the RHNA shortfall of 406 lower-income units. In accordance with current State housing law requirements, the sites would allow 100% residential use and require residential use to occupy at least 50% of the floor area in a mixed-use project.<sup>3</sup> Furthermore, through implementation of Program 18 of the HEU, and to further incentivize affordable housing in the City, the City will remove the discretionary requirements for multifamily housing in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones, meeting the minimum requirements for a density bonus as detailed in Program 11. The City will review and amend the Manhattan Beach Municipal Code (MBMC) to permit residential uses in the CL, CD, and CNE zones without requiring approval of a use permit and all projects that utilize the State density bonus will be eligible for streamlined approvals. In addition to further discussion of the HEU programs themselves, the proceeding section(s) will also provide more detail in regards to the methodology by which realistic development capacity was determined and summarizes the approach utilized

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<sup>1</sup> The capacity to accommodate an additional “buffer” of approximately 15% of the total 487 lower-income RHNA allocation (approximately 73 units) is recommended by HCD to ensure sufficient capacity exists to accommodate the RHNA allocation throughout the eight year planning period and comply with the provisions of Senate Bill (SB-) 166 (2017). SB-166 requires a city, county, or city and county to ensure that its housing element inventory can accommodate its share of the regional housing need throughout the planning period.



for the identification of sites selected for rezoning (Section 2.3, RHNA Approach) The underutilization of existing sites, paired with programs identified in the HEU and outlined below will ensure that the City can realistically meet the RHNA targets at all income levels during the proposed Housing Element's eight-year planning period.

## 2.3 RHNA Approach

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. The development of the sites inventory started with the non-vacant sites that were identified by the City based on field work and onsite planning efforts (i.e., site visits, visual surveys, and on-the-ground analyses), staff knowledge of existing conditions, and development interests expressed by property owners and developers. Then a series of GIS analyses were conducted to identify additional vacant and non-vacant sites in the City within the land use categories that are zoned to allow for residential development (i.e., medium and high density residential zones and certain mixed-use commercial districts) identified by their land to improvement ratio, age of buildings, existing use, proximity to resources and existing infrastructure, and other data indicating possible constraints to development feasibility.

### 2.3.1 Vacant and Underutilized Sites

State law requires each jurisdiction to include a land inventory to identify specific sites that are suitable for residential development and to demonstrate that sufficient land is available to provide adequate housing capacity to meet the RHNA for each income level. As part of the sites analysis, the City and consulting team had to identify specific sites that are suitable for residential development to determine whether there are sufficient sites to accommodate the City's regional housing need in total and by income category. It was determined early in the analysis process that vacant sites within the City are nearly nonexistent, which was verified using the Tax Assessor land use codes. Local governments with limited vacant land resources may rely on non-vacant and underutilized residential sites to accommodate their RHNA. Although HCD's Housing Element Site Inventory Guidebook (Government Code Section 65583.2) states that a "nonvacant site's existing use is presumed to impede additional residential development," the City's opportunities for residential development depends on underutilized sites due to the lack of vacant land. Although some parcels identified have vacated uses, or are largely undeveloped, per HCD's definition of vacant sites, all sites identified are considered non-vacant. Determining which non-vacant sites are underutilized and have the strongest potential for redevelopment can help identify ideal areas for accommodating new housing through redevelopment. The methodology for identifying and prioritizing underutilized sites was largely based on the following factors:

- **Building Age** - Buildings more than 30 years old. Building age is also a major factor influencing property valuation and land value. The age of housing is often an indicator of housing conditions. In general, housing that is 30 years or older is considered an older building as it may begin to need costly repairs.
- **Undervalued** - An assessed improvement to land value ratio less than 1.<sup>3</sup> Improvement values less than 1 are an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value.

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<sup>3</sup> Most counties, including the County of Los Angeles, tax their parcel owners based on the value of the land contained within the parcel boundaries, as well as the value of any improvements (e.g., buildings, parking lots, gardens, etc.) built upon that parcel. The ratio of the improvements' value to the land value is referred to as the improvement to land value ratio. For example, a parcel where the value of improvement (e.g., a single family residence) is equal to the land value, the improvement to land value ratio would be equal

- **Underbuilt** - Commercially zoned sites where the current floor area ratio (FAR) compared to the maximum allowable FAR is less than 100%. This indicator helps identify opportunity sites from a redevelopment perspective as the land is considered to be underbuilt.
- **Resource Access** - Within TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households.
- **Local Knowledge** – City knowledge of property owner interest to sell or of developer interest to redevelop was utilized to identify non-vacant sites regardless of the factors listed above.

The sites identified as underutilized include a mix of underutilized uses such as parking lots, automotive repair shops, office spaces and restaurants with large surface car lots, and single-family residential lots zoned for commercial and allowing multifamily and mixed-use developments. The underutilized sites are not known to have been occupied in the past five years with lower-income housing and have existing access to water, sewer, and dry utilities. In addition, online mapping tools—including Google Earth, Google Maps, and Los Angeles County Office of the Assessor Property Assessment Information System—as well as City knowledge and field verification of the current projects under various stages of planning, review, and/or implementation, and development interest in certain areas of the City, were used to verify underutilized status and existing uses. Table 2.3-1, Underutilized Site Capacity, provides a summary of existing capacity units identified by income category.

Table 2.3-1. Underutilized Site Capacity

Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
24	158	19	201

Source: City of Manhattan Beach (2022)

## Zoning and Land Use Designations

The sites identified as having the existing capacity to accommodate the City’s 6th Cycle RHNA allocation are located within five existing zoning designations: Medium-Density Residential (RM) zone, in only Area District III; High Density Residential (RH) zone in all Area Districts (I-IV); and the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts. Figure 2.3-1, Area District Map, shows the location of the four Area Districts in the City, while Figure 2.3-2, Existing Zoning, provides a map of the City’s existing zoning.

The Planning and Zoning Code is the primary tool for implementing the General Plan, including as it applies to land use policy and applicable land use designations (City of Manhattan Beach 2003). As such, the RM, RH, CL, CD, and CNE zones must be consistent with the goals and policies outlined in their corresponding designations. The applicable General Plan designations and provisions are discussed in further detail in Section 3.11, Land Use and Planning.

## Lower-Income Sites Inventory

In accordance with Housing Element law (Government Code Section 65583.2[c][3]), the City’s default density for accommodating capacity for lower-income units (322 very low-income units and 165 low-income units) requires zoning that permits a minimum of 30 dwelling units (du) per acre, as the City is considered a metropolitan

to 1. If the improvements value is higher than the land value, the ratio is greater than one, while a ratio of less than one implies that the value of the land is less than the value of the improvements and would therefore be considered undervalued.

jurisdiction. The project identified five zones with the required minimum densities to accommodate lower-income housing: RM in Area District III, RH, CL, CD, and CNE in all Area Districts. Underutilized sites in the higher density zones were generally included in the sites analysis as lower-income sites.

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to demonstrate that the projected residential development capacity of the sites identified in the HEU can realistically be achieved. This realistic capacity may use established minimum densities to calculate the housing unit capacity or development trends. As a conservative estimate of capacity calculations, the sites analysis estimated realistic capacity is 20 dwelling units per acre. However, while the realistic capacity for lower-income sites is low compared to the maximum allowable densities in the five identified zones (32.3 to 51.2 dwelling units per acre), with high land values and limited vacant land available in the City, it is expected that property owners will strive for densities closer to the maximums.

Although the City has five zones which permit a minimum of 30 dwelling units, it is detailed under State guidance that sites that are too small or too large may not facilitate developments of this income level. Government Code Section 65583.2(c)(2)(A)(B) requires that sites identified for lower-income units be limited to 0.5 to 10 acres. The median parcel size within the five permissible zones is approximately 0.06 acres (City of Manhattan Beach 2022). Therefore, opportunities for identifying contiguous and underutilized parcels that can reasonably be expected to be consolidated as one site are limited. The sites analysis identified three sites that have the capacity to accommodate lower-income housing. All three sites were identified on parcels considered underutilized. Further, these sites are not considered to have an impediment to development, and their current uses are reasonably assumed to be discontinued through the proposed Housing Element's eight-year planning period (2021-2029). In addition to the identification of suitable underutilized parcels, the project has also incorporated pipeline projects<sup>4</sup> and projected Accessory Dwelling Unit (ADU) development into its analysis for all applicable RHNA categories, including lower-income categories. Ultimately, after calculating the City's current and projected capacity under existing conditions, it was determined that the City has the existing capacity to support 81 lower-income units, resulting in a deficit or shortfall of 406 units for the lower-income RHNA categories.

## Moderate-Income Sites Inventory

Sites inventoried at the moderate-income level were identified in the RM, RH, and commercially zoned districts permitting multifamily and mixed-uses (CL, CNE and CD). Twenty-four sites were identified within approximately 5.11-acres throughout the City. Although the minimum acreage criterion does not apply to these moderate-income sites, there were limited sites available when considering the underutilized methodology previously described. The general uses included commercial, retail, and some older residential uses. Most of the buildings were built before 1970. Some had uses that were recently vacated. In total, the land inventory of current and projected capacity accommodates 163 moderate-income units in areas zoned RM, RH, CL, CD, CNE and CNE-D5, which is enough to accommodate the City's 6th Cycle RHNA allocation for moderate-income units and a buffer to ensure capacity throughout the Housing Element's eight-year planning period (2021-2029).

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<sup>4</sup> The pipeline projects applicable to the lower-income RHNA categories are expected to receive Certificates of Occupancy with the eight year 6<sup>th</sup> Cycle planning period.

## Above Moderate-Income Sites Inventory

Sites with luxury units or above moderate-income units as planned for the residential development in the pipeline were identified as having the capacity to accommodate the majority of the above moderate-income sites. While most of the units are accounted for through pipeline development expected to be completed during the planning period, there were 11 additional sites, totaling 0.74 acres identified to accommodate the remaining above moderate-income units. The underutilized sites identified for the above moderate-income RHNA were identified in the RM, RH and commercially zoned districts permitting multifamily and mixed-uses (CD and CNE). The existing uses on the sites identified include office spaces, restaurants, and single-family residences located in older buildings, as well as parking lots and empty parcels.

In total, the sites inventory identified sufficient capacity to accommodate 133 above moderate-income units, which is enough to accommodate the City's 6<sup>th</sup> Cycle RHNA for above moderate-income units.

## Accessory Dwelling Units

The HEU may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) to be developed within the planning period. The number of ADUs and JADUs that can be credited toward potential development must be based on the following factors:

- ADU and JADU development trends since January 2018
- Community need and demand for ADUs and JADUs
- Resources and incentives available to encourage their development
- The availability of ADUs and JADUs for occupancy
- The anticipated affordability of ADUs and JADUs

Recent changes to legislation governing the development and provision of ADUs and JADUs have sparked growth in these types of units in cities across California, including Manhattan Beach. While only three ADUs were permitted and constructed in the City between 2017 and 2019, the City has more recently issued 11 permits for the construction of these units from January 2020 to October 2021, with 22 additional ADU permit applications currently under review. Because ADU and JADU legislation has been revised several times since 2017, providing increased opportunities for the development of housing, it is expected that development trends will continue in an upward trajectory. Based on SCAG projections, of the total 83 ADUs that are projected to be built during the planning period, 14 are estimated to be affordable to very-low-income households, 36 to low-income households, five to moderate-income households, and 28 to above moderate-income households.

## Current Development

Two development projects in the pipeline are seeking entitlements, or have prospective development expected to be built within the planning period. One of the projects is a multifamily residential project, and the other is a mixed-use project, both of which will be redevelopment projects on non-vacant parcels.

The Verandas Project is located at 401 Rosecrans Avenue and 3770 Highland Avenue and consists of 73 above moderate multifamily units and six very low-income units on two abutting parcels with a total acreage of 1.02 acres and a density of approximately 77.8 units per acre.

The 1701-1707 Artesia is mixed-use project consisting of 649 square feet of commercial space and 14 units, including one very low-income unit. The site is approximately 0.3 acres and developed at a density of approximately 46.6 units per acre.

In total, 93 units are part of planned, approved, or prospective projects expected to be built within the planning period, that are counted toward meeting the City’s 6<sup>th</sup> Cycle RHNA allocation. Based on affordability restrictions, the projects are anticipated to provide a total of seven lower-income units, and 86 above moderate-income units. There are several other projects in the City with residential dwelling units, such as single-unit developments, that have not been included in this sites analysis which are expected to be completed during the planning period.

### Summary of Capacity to Accommodate RHNA

Based on the inventory of available sites, underutilized sites, the potential for ADUs and JADUs, and existing, planned, proposed, or in progress development projects, Table 2.3-2 presents the total RHNA compared to credits and capacity identified through the preparation of the HEU.

**Table 2.3-2. Total RHNA Compared to Credits and Capacity Identified**

Category	Total Units	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units
<b>RHNA</b>	<b>774</b>	<b>487</b>	<b>155</b>	<b>132</b>
Underutilized Site Capacity (No New Units)	201	24	158	19
Vacant Site Capacity	0	0	0	0
Pipeline Residential Development Credited Toward RHNA	93	7	0	86
Projected Accessory Dwelling Units	83	50	5	28
<b>Totals</b>	<b>377</b>	<b>81</b>	<b>163</b>	<b>133</b>
<b>Capacity Deficit (-)/ Surplus (+)</b>	<b>—</b>	<b>- 406</b>	<b>+8</b>	<b>+1</b>

Source: City of Manhattan Beach (2022)

As shown in Table 2.3-2, the City has a deficit or shortfall of 406 units for the lower-income RHNA category. To accommodate the remaining lower-income RHNA-allocated units, the City has identified potential sites in the General Commercial (CG) and Planned Development (PD) Zoning Districts that could be made available to accommodate residential uses appropriate for lower-income households within three years and 120 days from the beginning of the planning period (October 15, 2021). Through implementation of Program 2 of the HEU (discussed in Section 2.4 Housing Plan, of this ND), the City will establish an overlay, within the required timeframe, that encompasses a minimum of 20.3 acres of these sites to accommodate the shortfall of lower-income units. In addition, the City will also rezone and identify sites within the overlay (approximately 3.65 acres total) to

accommodate a buffer of at least 15% (approximately 73 lower-income units) as recommended by HCD to ensure sufficient capacity exists to accommodate the RHNA throughout the planning period.

## 2.4 Housing Plan

As required by State Housing Element law, the HEU includes a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA allocation. The goals, objectives, policies, and implementing programs of the Housing Plan emphasize: methods of encouraging and assisting in the development of new housing for all income levels; providing and maintaining adequate capacity to meet the housing need; removing government constraints to development, where feasible and legally possible; conserving and improving existing housing; providing increased opportunities for home ownership; reducing impediments to fair housing choice; and monitoring and preserving units at risk of converting from affordable to market rate. The Housing Plan also includes numerous policies to better guide decisions and achieve desired outcomes related to the development, improvement, preservation, and maintenance of housing.

The following is a summary of the key programs that would be included in the City's proposed HEU. Many of these are a continuation or modification of programs from the previous 2013–2021 Housing Element.

### **Program 1: Accessory Dwelling Units**

Accessory dwelling units (ADUs) help meet the City's housing needs for all income levels and provide a housing resource for older adults, students, and extremely low-, very low-, low- and moderate-income households. After passage of State ADU laws effective January 1, 2017, and January 1, 2020, the City applied State standards in evaluating ministerial applications for ADUs and has adopted ordinances consistent with State law. The City will continue to apply regulations from Chapter 10 of the MBMC, known as the Planning and Zoning Code, that allow accessory units by right in all residential or mixed-use zoning districts (zones) in accordance with State law.

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of ADUs and JADUs to be developed within the RHNA projection period. The full analysis in Appendix E, Sites Analysis and Inventory, used the trends in ADU construction since January 2018 to estimate new production; however, this only accounts for the effect of new laws without taking into account the local program the City will adopt to incentivize and promote the creation of ADUs, and the recent ADU Ordinance adopted in January 2021. Based on the local incentives, ADU and JADU trends since January 2018, recent sharp upward trends in 2021, and permits currently under City review, a conservative estimate of the number of units to be produced under this approach is an average of 10 ADUs each year during the projection period (see Appendix E of the HEU for the full Accessory Dwelling Unit Projection analysis).

The Community Development Department reviews and approves ADU entitlements and tracks the timely review of ADU applications and building permits issued. The Community Development Department collects data annually on planning entitlements and building permits for ADUs for the Housing Element Annual Progress Report, and will continue to do so per the ADU projection assumptions in the Sites Inventory (see Program 19, No Net Loss, for objectives and timelines tied to ADU monitoring).

Under Assembly Bill (AB) 671 (2019), local agencies must include a plan in their Housing Element to incentive and promote the creation of ADUs that can be offered at affordable rent for very low-, low-, or moderate-income households. As such, a primary objective of this Accessory Dwelling Unit Program is to promote the development of housing units

for lower-income persons or households. To comply with AB 671 and support the goal of permitting an average of 10 ADUs annually, including ADUs affordable to extremely low-, very low-, low-, and moderate-income households, the Community Development Department will develop tools to streamline the approval process and market ADU construction. These public engagement and information tools may include information packets on the entitlement process, a dedicated web page including a step-by-step guide of the entitlement process, preparation of Frequently Asked Questions (FAQs) for distribution at the planning counter or community meetings, and other engagement tools.

As part of Program 19, No Net Loss, the City will review the ADU trends to date at the planning cycle mid-point (by November 2025), and determine if the City is on track to achieve the annual average goal of 10 building permits issued for ADUs. If the City is not on track and there is not an appropriate buffer of sites to make up for the difference as fully explained in Program 19, the Community Development Department will further review and develop additional incentives and review and reallocate existing staffing resources as needed to achieve its goal. Additional incentives may include direct outreach mailings to property owners, technical assistance, and financial assistance.

## **Program 2: Adequate Sites**

As fully analyzed in the sites analysis, the City has a remaining lower-income RHNA of 406 units for project's eight-year planning period. The City will establish an overlay district that encompasses a minimum of 20.3 acres of sites in the General Commercial (CG) and Planned Development (PD) districts to accommodate the remaining lower-income RHNA of 406 units. The acreage needed is assumed using a realistic capacity of 20 dwelling units per acre, based on the minimum density requirements outlined below.

Pursuant to State law, the overlay district's standards adopted as part of the Adequate Sites Program to address the RHNA shortfall will adhere to the following components of Government Code sections 65583.2(h) and (i):

- Sites must accommodate 100% of the shortfall for very low- and low-income units.
- Sites must allow a minimum of 16 units per site.
- Sites must permit a minimum of 20 dwelling units per acre.
- Sites must allow 100% residential use and require residential use to occupy at least 50% of the floor area in a mixed-use project.
- Sites must permit owner-occupied and rental multifamily uses by right pursuant to Government Code Section 65583.2(i) for developments in which 20% or more of the units are affordable to lower-income households.

The allowable densities for residential redevelopment in the overlay district will range from a minimum density of 20 dwelling units per acre, consistent with State law, to a maximum density of at least 30 dwelling units per acre. The City will ensure that the development standards that result from the planning process will be carefully crafted such that they will not prevent or prohibit the provision to facilitate development at the maximum densities allowed under the overlay. Any residential development standards in the overlay district will not preclude the minimum densities or requirements of State law outlined above, creating the opportunity for several hundred residential units on sites that previously only permitted commercial uses. As reflected in the sites analysis, each site identified as a potential site for the Adequate Sites Program's overlay has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.

In addition, the City commits to rezoning an additional 3.65 acres of sites to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. The City will ensure that the sites are rezoned at densities deemed appropriate to accommodate housing for lower-income households as defined by Government Code Section 65583.2(c)(3)(B). This will provide a buffer of at least 73 units of multifamily housing.

### **Program 3: Affordable Housing Streamlining**

The City currently allows concurrent processing of all discretionary applications for a project, thereby streamlining the development process. The City will continue to offer concurrent processing of all discretionary applications for a project and inform developers of the opportunity for concurrent processing. The City has a streamlining process in place specifically for multifamily housing in residential zones. Multifamily housing developments in residential zones (Medium-Density Residential District [RM], High-Density Residential District [RH], and Residential Planned Development District [RPD]) with fewer than six units are permitted by-right. Projects with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan approved by the Director.

To further assist in the development of housing for extremely low-, very low-, low-, and moderate-income households, the City provides an affordable housing streamlined approval process in accordance with State requirements for qualifying development proposals that provide affordable units under SB 35 streamlining. The City annually reports on affordable housing streamlining applications in the Housing Element Annual Progress Report. The City will revise internal permitting procedures to ensure that staff has clear procedures for responding to proposals for SB 35 streamlining and for prioritizing qualifying SB 35 housing developments consistent with State law.

### **Program 4: Affordable Senior Housing Preservation**

This program is concerned with ensuring that the current affordability of the Manhattan Village Senior Villas project, located at 1300 Park View Avenue, is being maintained. While the project's affordability agreement with the City does not expire and the components of affordability are preserved via a deed restriction that runs with the land, the City should make contact with the owners of the Manhattan Village Senior Villas and continue to monitor and enforce affordability throughout the planning period. In addition, the City should identify qualified affordable housing developers and local non-profits as potential purchasers/managers of affordable units as a proactive measure.

### **Program 5: Americans with Disability Act (ADA) Improvements Program**

The City will ensure the Manhattan Village Senior Villas ADA Pathway Project is completed by 2022 to increase accessibility for older adults and people with disabilities in the City. Following completion of the Senior Villas ADA Pathway Project, the City will utilize future CDBG funds for additional ADA-improvements focused on bringing existing, non-compliant ramps into ADA-compliance at various locations throughout the City, as identified by the Public Works Department. These improvements will increase accessibility for people with disabilities throughout the City.



### **Program 6: Annual Progress Reports**

The City will continue to report annually on the City's progress toward its eight-year RHNA housing production targets and toward the implementation of the programs identified in the Housing Element. Further, the City will identify and prioritize State and local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports (AB 1255, 2019; AB 1486, 2019; AB 879, 2017).

### **Program 7: By-Right Development**

The City will allow developments by-right pursuant to Government Code section 65583.2(i) when 20% or more of the units are affordable to lower-income households on sites identified in the sites analysis to accommodate the lower-income RHNA allocations that were previously identified in past housing elements in accordance with the specifications of Government Code Section 65583.2(c) and Housing Element law.

### **Program 8: Code Compliance**

The City will continue to ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources.

### **Program 9: Countywide Affordable Home Ownership Program**

The Home Ownership Program (HOP) is administered by the Los Angeles County Development Authority (LACDA). This program provides funding to lower-income households looking to purchase a home through down payment and closing costs assistance for single-family homes, condominiums, and townhomes. The HOP loan provides a second mortgage loan for first-time homebuyers with an assistance amount of up to \$85,000, or 20 percent of the purchase prices, whichever is less, and offers 0 percent interest loans. Participant's income must not exceed 80 percent of the County Median Income based on the number of persons in the household. Properties must be located in cities participating in the HOP, which includes Manhattan Beach. The City will advertise program availability on the City's website and at the planning counter.

### **Program 10: Countywide Affordable Rental Housing Development**

This program is administered by the Los Angeles County Development Authority (LACDA). This program provides financial assistance to developments located in cities participating in the Los Angeles Urban County Program, including the City of Manhattan Beach. This program supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles.

Projects funded through this program are expected to help combat homelessness, meet the housing needs of their communities, provide local economic development opportunities during construction, and assist in the alleviation of any local blighting conditions. This program provides financial and technical assistance to acquire sites, develop affordable rental housing, and acquire and rehabilitate affordable rental housing. Technical assistance and funding for pre-development activities may also be provided for nonprofit housing developers participating in specific projects. The funds are made available as low-interest long term loans. Funds for the program are administered

through a Notice of Funding Availability (NOFA) issued by LACDA. All units developed utilizing these resources are made available to households earning less than 50% of the median area income.

The City will advertise the availability of this additional source of funds to support in the development of rental housing. Program availability will be advertised on the City's website and at the planning counter.

Further, the City will increase coordination and collaboration with the LACDA to promote Manhattan Beach as a City that supports affordable housing development and as an ideal candidate for the allocation of funding for affordable housing.

### **Program 11: Density Bonus**

Government Code Section 65915 requires that a jurisdiction adopt a local Density Bonus Ordinance consistent with State law. To satisfy this requirement, the City will review and amend the local Density Bonus Program Ordinance to ensure consistency with State requirements, including the provision of a bonus for student affordable housing, senior housing, and permitting up to an 80% bonus for 100% affordable developments (as provided in Appendix C, Constraints and Zoning Analysis, of the HEU).

### **Program 12: Developer Outreach and Transparency**

The City will actively work with the development community to identify ways that lower-income housing may be provided, including housing for extremely low-income households and those with special housing needs. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households. Another outreach effort will inform the development community and property owners as to development opportunities for accessory dwelling units.

The City will maintain current information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all Planning and Zoning Ordinances, development standards, and annual fee reports or other relevant financial reports, consistent with the requirements of AB 1483 (2019).

### **Program 13: Energy Conservation and Energy Efficiency Opportunities**

Under the City's adopted Environmental Work Plan priorities, adopted Strategic Plan goals, and in compliance with State and General Plan mandates, the City is creating a Climate Resiliency Program, called Climate Ready Manhattan Beach (Climate Ready MB). The Climate Ready MB program includes completing a Sea Level Rise Vulnerability Assessment; creating a Climate Action and Adaptation Plan; and updating the City's Local Coastal Program-Land Use Plan, Local Hazard Mitigation Plan, and General Plan.

In addition, the City has adopted the 2019 California Green Building Standards Code which includes energy efficiency, water efficiency and conservation, and material conservation and resource efficiency standards to encourage sustainable development and reduce residential and nonresidential building energy use. The City anticipates State Green Building Codes being updated in the next two years, at which point the City will also update City regulations as detailed in Program 31.

### **Program 14: Fair/Equal Housing Program**

Government Code Section 65580 asserts that the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian is a priority of the highest order. Governments and private sectors should work cooperatively to expand housing opportunities and accommodate housing needs in California. Furthermore, designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the State's housing goals. As such, Program 14, Fair/Equal Housing Program is designed to promote equal housing opportunities in Manhattan Beach. The City recognizes the effect that discrimination has in limiting housing choice and equal opportunity in renting, selling, and financing housing. In accordance with Government Code Section 8899.50 (b)(1), the City administers its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and takes no action that is materially inconsistent with its obligation to affirmatively further fair housing. The City contracts with the Housing Rights Center (HRC), a nonprofit organization that helps educate the public about fair housing laws and to investigate reported cases of housing discrimination. HRC provides free services including landlord tenant counseling, outreach and education, and discrimination investigations. The City offers fair housing information and referrals upon request. The City will continue referral services and contracting fair housing services with HRC and will work to provide this information as well as providing links to additional fair housing resources on the City website. In addition, the City will take steps to affirmatively further fair housing during the planning period. Other additional steps the City will take to further fair housing efforts during the planning period include: supporting and participating in the Regional Analysis of Impediments to Fair Housing Choice; promoting compliance with housing discrimination law by developing informational fliers for developers; and developing a process that prompts the consideration of fair housing in the planning decision process.

### **Program 15: Housing Choice Voucher Program**

An important element of the City's strategy in providing housing opportunities for extremely low-income and low-income households is the Section 8 Housing Choice Voucher Program, a program offering tenant-based assistance subsidized by the Federal government for very low-income families, seniors, and persons with disabilities. The Los Angeles County Development Authority subsidizes the balance of the monthly rent in direct payments to the owner through funding received by the U.S. Department of Housing and Urban Development. The City will continue to participate in LACDA program, coordinate with the Redondo Beach Housing Authority and publicize availability of Section 8 rental assistance for households in the City by enhancing the City's website with information.

### **Program 16: Lot Consolidation Incentive**

The City already provides an additional density bonus incentive under Section 10.12.030 of the Municipal Code above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus. In accordance with MBMC Section 10.12.030, multifamily developments meeting the minimum requirements are currently granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.50 acres to 0.99 acres through the existing lot consolidation bonus incentive. However, to specifically incentivize affordable housing, including housing for extremely low- and very low-income households, reach the City's housing target for the 6th Cycle planning period, and incentivize small lot development, the City will expand the current lot consolidation

incentive for sites that have been identified via Program 2, Adequate Sites.<sup>5</sup> Sites identified in the “Sites Inventory” will be granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.30 acres to 0.49 acres. In addition, The City will continue to facilitate consolidation and development of small parcels. These facilitation measures will include but are not limited to: creating increased publicity and awareness; providing assistance to affordable housing developers in identifying potential opportunities for lot consolidation; and expediting processing and waiving fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.

### **Program 17: Manufactured Housing**

State law requires that the City’s Planning and Zoning Code permit manufactured housing in the same manner and in the same zone(s) as conventional single-family dwellings in zones that permit single-family dwellings (Government Code Section 65852.3). To comply with State law, the City will amend the Planning and Zoning Ordinance to clarify that manufactured housing is treated as a single-family dwelling and is permitted in all of the same zones and same manner as other single-family structures, including in commercial or mixed-use zones.

State law also requires that cities and counties allow mobile home parks (including condominium and cooperative parks) on all land planned and zoned for residential land use; provided, however, that a use permit may be required (Government Code Section 65852.7). To comply with State law, the City will amend the Municipal Code to permit mobile home parks on all land zoned or planned for residential land uses. In addition, the City will enforce mobile home park replacement and relocation requirements in accordance with State law (Government Code Section 65863.7).

### **Program 18: Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts.**

Multifamily housing developments in the CL, CD, and CNE districts are currently permitted through approval of a conditional use permit. To further incentivize affordable housing in the City, the City will remove the discretionary requirements for multifamily housing in the CL, CD, and CNE zones meeting the minimum requirements for a density bonus. The City will review and amend the Municipal Code to permit residential uses in the CL, CD, and CNE zones without requiring approval of a use permit and all projects that utilize the State density bonus will be eligible for streamlined approvals.

In addition, under Chapter 10.16, Commercial Districts, of the MBMC, portions of a building intended for residential use in a mixed-use project or purely residential developments in mixed-use zones are currently subject to the High-Density Residential District residential standards in Chapter 10.12, Residential Districts, of the MBMC. To minimize constraints to the development of affordable housing, including housing for extremely low- and very low-income households, the City will adopt development standards for multifamily residential and mixed-use projects in the three commercial mixed-use zones (CL, CD, and CNE) instead of deferring to the High-Density Residential standards, which are subject to voter approval for certain amendments to residential development standards.<sup>6</sup> The City will ensure that the adopted standards for

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<sup>5</sup> Specific parcel details for sites included in the expansion of the current lot consolidation incentive program can be found within Tables 7, 8, 9, 15, and 16 of Appendix E, Sites Analysis and Inventory, of the HEU.

<sup>6</sup> In accordance with Section 10.12.0030, Property development regulations: RS, RM, and RH district, the property development standards for the residential zoning districts, RS, RM and RH, shall not be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions or

residential and mixed-use projects do not reduce the intensity of land use<sup>7</sup> or reduce the site's residential development capacity, consistent with the Housing Crisis Act of 2019. Through this process, the City will implement Program 20, Objective Design Standards, through the development of objective design standards.

### **Program 19: No Net Loss**

The City will utilize their development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under SB 166 (2017). The City will develop and implement a monitoring procedure pursuant to Government Code Section 65863 and will make the findings required by that code section if a site is proposed for development with fewer units or at a different income level than shown in the proposed Housing Element.

As part of Program 2, Adequate Sites, the City will rezone to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. This will ensure that sufficient capacity exists within the City to accommodate the RHNA throughout the planning period; however, if at any time during the planning period, a development project results in fewer units by income category than identified in the sites analysis for that parcel and the City cannot find that the remaining sites in the HEU are adequate to accommodate the remaining RHNA by income level, the City will within 180 days identify and make available additional adequate sites to accommodate the remaining RHNA. Further, as outlined in Program 1, Accessory Dwelling Units, the City will check the annual ADU trends at the planning cycle mid-point (October 15, 2025). If the City finds that the ADU production does not keep pace with the ADU assumptions toward the RHNA, and that there is not an appropriate buffer of sites remaining to account for the deficit of projected lower- or moderate-income ADUs, the City will identify additional sites within six months. If the City finds that the ADU production does not keep pace with the ADU assumptions, the City will also review and streamline permitting procedures and review and reallocate existing staffing resources as needed to achieve its goal (see Program 1, Accessory Dwelling Units, above for further details).

### **Program 20: Objective Design Standards**

The City will increase transparency and certainty in the development process through objective design standards. Any new design standards developed and imposed by the City shall be objective without involvement of personal or subjective judgement by a public official and shall be uniformly verifiable by reference to the City's regulations in accordance with the requirements of the Housing Crisis Act of 2019 (SB 330, 2019) and related State housing law.

### **Program 21: Older Adults Programs**

The City provides various services for the special needs of older adults so that they may remain in the community. The older adults of the community regularly rely on these resources for services and programming. The Older Adults

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minimum lot area per dwelling unit, unless the amendment is first submitted to a city-wide election and approved by a majority of the voters.

<sup>7</sup> In accordance with State law, "reducing the intensity of land use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site's residential development capacity.

Program provides services to predominantly lower-income older adults, including those with extremely low-incomes, and provides some services for residents with disabilities (all ages).

This program is operated by a part-time Older Adults Program Manager who is contracted through the Beach Cities Health District and the City of Manhattan Beach Fire Department. At any given time, the Older Adults Program may assist up to 100 older adults, of whom 70 percent are lower income. Other existing City services falling under the purview of Program 23 include: providing funds for social service groups serving older adults, including the Salvation Army's Brown Bag Food Program, Care Management for Manhattan Beach Seniors, and South Bay Adult Care Center; providing temporary technical assistance to older adults by helping older adults with changes resulting from the Clean Power Alliance program; and to continue supporting the City's Parks and Recreations Department's older adults programs such as softball leagues drama, poetry, and fitness classes.

Finally, the City recently approved an assisted living project for older adults in 2021, consisting of 95 rooms (115 total beds), a facility kitchen, and common areas (foyer, parlor, bistro, private dining room, general dining rooms, activity rooms, and staff rooms). The project will include 64 assisted living rooms and 31 memory care rooms for Alzheimer's patients and individuals with memory loss. The project is expected to be completed and increase assisted living opportunities for older adults in the City during the 6th Cycle planning period.

### **Program 22: Parking Reductions**

Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing for vulnerable populations. The City will make Municipal Code revisions to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development (AB 1851).

The City currently provides reduced parking requirements consistent with AB 2345 (2020) for housing developments that qualify for a density bonus pursuant to State density bonus law. To identify opportunities for additional parking reductions for residential multifamily housing, the City will complete a parking study for sites that are zoned to allow residential development outside of the Coastal Zone. This may include, but not be limited to, reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities.

### **Program 23: Preserving Housing Capacity**

Section 10.12.030 of the MBMC establishes standards to avoid "mansionization." These provisions act to discourage construction of overly large dwellings that are out of scale with the surrounding neighborhood. These provisions include increased setback and open space requirements for new single-family residences. In addition to issues of scale, the large dwellings are also more costly, and lead to increased pressure to demolish modest dwellings in favor of lavish structures affordable only to the most affluent. In an effort to incentivize multifamily housing while continuing to disincentivize "mansionization," the City provides an exception for minimum and maximum lot sizes for multifamily housing with three (3) or more dwelling units in accordance with Section 10.12.030.k of the MBMC. The City also provides an exception to a lot merger of parcels for existing religious assembly and public or private school uses, when the site is used as a single building site under Section 11.32.090 of the MBMC.

The maximization of lot standards helps prevent consolidation of lots for the purpose of developing large, single dwelling unit. However, under Section 10.52.050.F of the MBMC, property owners in residential zones may develop contiguous separate lots as one site without requiring a lot merger, with only detached accessory structure(s) on one or more of the lots, which includes guest houses (including ADUs and JADUs), garages and parking areas, and pools. For development standards, with the exception of the parking calculation, the lots are treated as separate. This presents property owners with the opportunity to buy adjacent lots with existing unit(s) for the purpose of demolishing the unit(s) and developing only detached accessory structure(s), ultimately reducing the City's overall housing stock.

To mitigate the loss of dwelling units through demolition and to conserve the existing housing stock, the City will amend the Municipal Code to eliminate provision 10.52.050.F from the Municipal Code such that all parcels operating as one site will need to be consolidated and therefore be subject to existing maximum lot size requirements. Further, while the City incentivizes lot consolidation for multifamily residential developments (Program 16, Lot Consolidation Incentive), the City will refrain from approving any merger that would result in a net loss in residential capacity and conflict with the no net loss provisions of SB 330 (Program 26 Replacement Requirements).

#### **Program 24: Priority Services**

The City will internally coordinate with the Public Works Department for review and consideration when reviewing new residential projects. The City's current Urban Water Management Plan acknowledges the requirements and includes the projected water use for single-family and multifamily housing needed for lower-income households. The Community Development Department will coordinate with Public Works to ensure that proposed developments which include housing affordable to lower-income households, including extremely low- and very-low income, are prioritized for the provision of water and sewer services. Internal coordination will further support the prioritization of water and sewer services for future residential development, including units affordable to lower-income households.

#### **Program 25: Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**

In an effort to proactively remove ambiguities that may impose extra hurdles for people with disabilities, the City will amend its reasonable accommodation procedures (Chapter 10.85 of the Municipal Code) to remove discretionary referrals to the Planning Commission and the requests shall be reviewed and may be granted solely by the Community Development Director. In addition, the City will develop materials and outreach methods to increase public awareness and ease of access to policies, programs and processes addressing reasonable accommodation.

#### **Program 26: Replacement Requirements**

The City will mandate replacement requirements pursuant to the requirements as set forth in Government Code Section 65915, subdivision (c)(3) on sites identified in the Sites Inventory (see the Electronic Housing Element Site Inventory Form included as **Exhibit A** of Appendix E, Sites Analysis and Inventory, of the HEU) and consistent with the Housing Crisis Act of 2019 and related state housing law for proposed housing developments on sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels

affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households.

### **Program 27: Solar Panel Incentives**

Solar panels may be used on roofs of residential and commercial structures to generate electricity that is either transmitted to the grid or stored in batteries on-site. The existing height limits in Manhattan Beach ensure rooftop solar units would not eventually be subject to shade and shadow, which would render them ineffective. To successfully promote the use of alternate energy, the City has subsidized permitting fees for solar panels since 2008. The current permit fee for solar panels is \$100.00. The City's fee incentives resulted in 800 solar permits issued during the 5th Cycle Planning Period. The City will continue to promote and incentivize alternate energy through permit subsidies for solar panels.

### **Program 28: Specialized Housing Types to Assist Persons with Special Needs**

#### **Employee Housing**

If the City's Planning and Zoning Code is ever amended to add a zoning district that permits agricultural uses, the City will make corresponding municipal code amendments related to agricultural workers and current employee housing requirements consistent with the State Employee Housing Act (Section 17000 et seq. of the Health and Safety Code) to assist in the production of this special housing type to serve lower-income households, including extremely low-income households.

#### **Emergency Shelters**

Emergency shelters serve those experiencing homelessness, including extremely low-income households and those with special housing needs. The City will amend the MBMC to ensure that parking requirements for emergency shelters accommodate the staff working in the shelter and do not require more parking than other residential or commercial uses within the same zone (AB 139, 2019).

#### **Supportive Housing**

State law provisions have recently been modified to require approval of supportive housing that meets the specified requirements of State law as a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses (AB 2162). Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within 0.5 miles of a public transit stop (Government Code Section 65915). The City will amend the MBMC to comply with current State law. This amendment will provide additional housing opportunities for lower-income households, including extremely low-income housing and those with special housing needs.

#### **Low-Barrier Navigation Centers**

Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The MBMC does not currently define Low Barrier Navigation Centers; therefore, it also does not identify zoning districts in which this use is permitted. As such, the City will amend the MBMC to permit the development of Low Barrier Navigation Centers



that meets the requirements of State law as a use by-right, without requiring a discretionary action, in mixed-use and non-residential zones that permit multifamily uses (AB 101). This use will increase opportunities to serve those experiencing homelessness, including extremely low-income households and those with special housing needs.

### Residential Care Facilities

Residential Care Facilities serving seven or more persons, referred to as Residential Care, General in the MBMC, is classified as a public and semipublic use under Section 10.08.040 - Public and Semipublic Use Classifications of the MBMC. As such, these facilities are conditionally permitted uses requiring a Use Permit in the PS (Public and Semi-Public) zone. Further, the City facilitates additional opportunities for development of Residential Care, General by permitting these facilities in two additional zoning categories (residential and commercial), including the RH, RPD, RSC, and CG, subject to a Use Permit.

Due to the complexity associated with Residential Care Facilities, the necessary infrastructure, and requirements tied to state licensing, opportunities to remove the discretionary permit are limited. However, under this program, the City will mitigate any constraints that may be posed by a Use Permit for Residential Care Facilities by making the approval process more predictable and transparent. Currently, Residential Care, General facilities are subject to the broader findings for all Use Permits outlined in Section 10.84.060 - Required Findings, of the MBMC. The City will amend the Zoning Code to include findings specific to Use Permits for Residential Care, General (serving seven or more persons) facilities. The City will ensure the findings are objective and improve certainty in the development approval process to better facilitate the production of Residential Care Facilities to serve the needs of the community.

### Program 29: Support for Those Experiencing Homelessness

Under this program, the City will continue to implement the policies and actions of its Five-Year Plan to Address Homelessness in Our Community to continue addressing the needs of its residents experiencing homelessness for affordable housing and housing navigation services. The City will also continue regional coordination in partnership with the Cities of Redondo Beach and Hermosa Beach and seek additional funding sources with the South Bay Beach Cities for continued homeless services. Further, the City will continue to educate the community on various resources in the South Bay and ensure the resource guide for those experiencing homelessness is kept up to date and available on the City's website.

### Program 30: Surplus Lands

The City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports in accordance with the requirements of AB 1486 (2019). If the City identifies any public land that they intend to declare as surplus land at any point, the City will send notices about available, surplus local public land to HCD, local public entities within the jurisdiction where the surplus local land is located, and any developers who have notified HCD of their interest in developing affordable housing on surplus local public land in accordance with the requirements set forth in the Surplus Land Act (Government Code Section 54220-54234).

## Program 31: Water Conservation and Green Building Standards

Section 7.44.020 of the MBMC addresses water conservation and provides for permanent water conservation measures and drought restrictions. In addition, water conservation requirements apply to 100% of projects that the City approves. Water conservation requirements are built into Title 9, via the Green Building Code, and Title 10 via State MWELo requirements.

The City has adopted the 2019 California Green Building Standards Code, and additionally requires the following measures:

- Insulating hot water pipes to minimize energy loss.
- Using caulk and insulation that are formaldehyde-free or contain low VOC (volatile organic compounds).
- Pre-plumb water piping and sensor wiring to the roof for future solar water heating.
- Use duct mastic on all duct joints and seams to minimize energy loss.
- Install "Energy Star" bath fans vented to the outside.
- Energy efficient water fixtures.

The City anticipates State Green Building Codes being updated in the next two years, at which point the City will also update City regulations.

## 2.5 Scope of Analysis

The project being evaluated within this document is the HEU, which is a policy document that conceptualizes how the City will provide the capacity for a total of 774 housing units, as assigned by SCAG during the 6th Cycle RNHA, during the period of 2021 through 2029. Under existing conditions, the City has the capacity to accommodate 377 dwelling units; as such, the City is required to identify how it will provide the capacity for an additional 479 dwelling units (406 units plus an additional buffer of 73 units). The HEU includes programs that conceptualize how the City will ultimately provide the capacity for these additional 479 dwelling units.

No development is currently proposed under the HEU; however, implementation of the HEU is designed to facilitate construction of 774 new units throughout the City. Additionally, the HEU includes programs that support the existing and future residents of the City, including future rezoning (Program 2). Given the developed and built out nature of the City, new housing units constructed throughout the City may ultimately qualify for one or more categorical exemptions under CEQA (such as Class 3, Small Structures or Class 32, Infill Development Project), exemption under CEQA, consistent with State CEQA Guidelines Section 15332, or for CEQA Streamlining and with State laws to promote the development of infill affordable housing (Programs 7, 11 and 18). As appropriate the below analysis addresses the potential physical impacts associated with implementation of the HEU.

## 2.6 References

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2021.  
<https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2022. 6th Cycle Housing Element Update (HEU). Accessed January 5, 2022.

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### 3 Initial Study Checklist

**1. Project title:**

City of Manhattan Beach General Plan Amendment: 6<sup>th</sup> Cycle Housing Element Update

**2. Lead agency name and address:**

City of Manhattan Beach  
1400 Highland Avenue  
Manhattan Beach, California 90266

**3. Contact person and phone number:**

Talyn Mirzakhonian, Planning Manager  
310.802.5510

**4. Project location:**

Citywide

**5. Project sponsor's name and address:**

City of Manhattan Beach  
1400 Highland Avenue  
Manhattan Beach, California 90266

**6. General plan designation:**

Not applicable for adoption of a Housing Element Update

**7. Zoning:**

Not applicable for adoption of a Housing Element Update

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

The purpose of the HEU is to provide an update to the Housing Element of the City's General Plan. The HEU involves an amendment to the General Plan in order to adopt, as required by State Law, an updated Housing Element. The intent of the HEU is to address the comprehensive housing needs of the City. State law requires jurisdictions to update their Housing Elements every eight years to outline their existing and projected housing needs, to discuss barriers to providing that housing, and to propose actions to address housing needs and barriers. The programs proposed in the HEU are intended to be implemented over an eight-year planning horizon (2021-2029). See Section 2 for a detailed project description.

**9. Surrounding land uses and setting (Briefly describe the project's surroundings):**

The City of Manhattan Beach (City) is located in the southwest portion of Los Angeles County (County) along the Pacific Ocean, approximately 19 miles southwest of Downtown Los Angeles. The City is bordered by the City of El Segundo and the Chevron Oil Refinery to the north, the cities of Redondo Beach and Hawthorne to the east, the City of Hermosa Beach to the south, and the Pacific Ocean to the west. The City is almost entirely built out and contains vegetation that is ornamental.

The City is made up primarily of low density, single-family residential development, designated in the Land Use Element as Low Density Residential and zoned as RS. Medium and high-density residential areas (RM and RH zones) extend eastward from the City's coastline and comprise much of the City's LCP planning area. Other land use types include commercial, mixed-use, industrial, parks and open space, and public facilities. Zoning districts potentially impacted by the HEU include: the Medium-Density Residential (RM) zone, in only Area District 3; High Density Residential (RH) zone in all Area Districts; the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts; the Planned Development (PD) zone: and, the General Commercial (CG) zone.

**10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

Approval from the California Department of Housing and Community Development (HCD).

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

**Note:** Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City contacted three Native American individuals and/or tribal organizations on August 4, 2021:

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians, Kizh Nation
- Kenneth Kahn, Tribal Chairman, Santa Ynez Band of Chumash Indians
- Joseph Ontiveros, Cultural Resources Director, Sobaba Band of Luiseño Indians

The Santa Ynez Band of Chumash Indians, responded on August 9, 2020<sup>1</sup>, and again on August 23, 2021, stating that the Elders' Council requested no further consultation on the HEU but requested to be notified of any changes in scope, or if supplementary literature reveals additional information. No further

communication was received by the Santa Ynez Band of Chumash Indians, or any other Native American individuals and/or tribal organizations contacted on August 4, 2021. (For further discussion, see Section 3.18, Tribal Cultural Resources).

### Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology and Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

**Determination (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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Signature

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Date



## Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance

## Impact Evaluation Methodology and Assumptions

Based on information available to the City at the time of preparation of this ND, the following sections evaluate the 6<sup>th</sup> Cycle Housing Element's reasonably foreseeable direct and indirect impact on the environment.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, which demonstrates a need for land appropriately zoned to facilitate the additional required units. While a rezoning program is identified within the proposed Housing Element, the actual rezoning of property within the City to accommodate RHNA would occur at a future date and is not one of the discretionary actions being undertaken at this time. Although implementation of the programs contained in the document would facilitate residential development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, any proposed land use changes would follow the adoption of the proposed HEU and would be subject to future environmental review, as required, under CEQA, once sufficient information is made available. All future projects would be required to adhere to relevant development standards and design guidelines contained in the Planning and Zoning Ordinance and other applicable regulatory requirements governing the nature and quality of development within the City.

While underutilized parcels have been identified to accommodate 377 RHNA category units, the parcel locations for the bulk of the units required to fulfill the City's lower-income category obligations have yet to be determined. To meet a capacity deficit of approximately 406 lower-income units, through Program 2, the City has identified potential sites in the CG, PD, RM and RS zoning districts to be made available to accommodate residential uses appropriate for lower-income households within the approximate three-year planning horizon. Most of the qualifying sites were identified under the same criteria detailed in Sections 2, Project Description, for underutilized sites appropriate to accommodate development affordable to lower-income households; however, there are some sites which do not meet the underutilized criteria outlined under Section 2 but have been selected as there is interest to develop these sites or it is assumed that the overlay would create developer interest as these sites have not previously allowed for residential development. Figure 2.2-1, Potential Sites to Accommodate Lower-Income Shortfall, shows sites selected as having the potential for additional capacity to accommodate the City's remaining RHNA allocation for lower-income units, including a buffer to ensure sufficient capacity throughout the planning period. Ultimately however, only a fraction of the sites identified in the proposed HEU will ultimately be selected for overlay or rezone. As such, it would be inappropriate for this ND to conduct a site-specific level of analysis, as consideration of impacts resulting from development of all of the potential sites identified would significantly overestimate the HEU's impact on the environment.

Due to the programmatic nature and phased implementation strategy of the proposed Housing Element, it is anticipated that the HEU as currently described would not result in a significant impact to the environment. The analysis conducted in this ND recognizes that over half of the sites potentially affected have yet to be identified, and that implementation of any overlay or rezoning program would trigger additional CEQA review and the corresponding program level analysis, which would in-turn be required to assume the maximum build out made allowable by the proposed zone change(s). In addition, many future development facilitated by the HEU—including development as part of the rezoning program—would qualify as “infill” as defined in Section 21061.3 of CEQA. As infill, certain projects may be eligible for existing or proposed streamlining efforts and/or a categorical exemption (CE) under CEQA. However, as with any “project” level development, the precise nature of review required would be assessed by the City on a case-by-case basis, and certain projects accommodated by the HEU would still require

project level CEQA review and be subject to discretionary approval. In addition, regardless of whether the review process is discretionary or ministerial, any project proposed in the City would still be subject to all applicable ordinances, policies, and standards in effect as of the date of the developer agreement.

The City's existing streamlining processes specify that multifamily housing developments in residential zones (Medium-Density Residential District [RM], High-Density Residential District [RH], and Residential Planned Development District [RPD]) with less than six units are permitted to be developed by-right and are therefore ministerial and exempt from CEQA. In addition, projects with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan reviewed and approved by the City, which is similarly a ministerial process exempt from CEQA. Further, and as detailed above in Programs 3, 11, and 18, approval of the HEU would result in more project types qualifying for these existing streamlining processes and would likely facilitate additional measures to incentivize multifamily development within the City, such as the elimination of existing discretionary review requirements in favor of more streamlined administrative review processes. In addition, at the State level the California Legislature has recently passed a large volume of laws related to housing. These laws include Senate Bill (SB) 9 (by-right duplexes), SB 10 (allowing jurisdictions to upzone for up to ten units in certain locations), SB 290 (which reforms the State Density Bonus Law), and SB 478, which limits floor area ratio (FAR) and lot coverage standards that limit multifamily housing. This trend of laws aimed at addressing the State's housing affordability crisis is expected to continue into the 2022 legislative session and beyond and will likely result in the facilitation of further streamlining efforts and removal of "barriers" to development (including discretionary review requirements).

Housing developed under the existing capacity within the City would likely fall under the existing and/or proposed State and local streamlining programs and ultimately, upon completion of the rezoning program, projects processed in the future would also likely be eligible for streamlining or an exemption under CEQA. However, the predetermined criteria for selection that was applied to all existing and potential capacity sites identified in the HEU serves to promote residential development only in zones that have been previously screened for suitability to accommodate housing. Further, the precise language of the HEU programs and associated MBMC regulations would generally allow for a streamlined review process only under a limited and defined set of circumstances, where the primary objective is the achievement of measurable progress towards meeting the City's 6<sup>th</sup> Cycle RHNA allocation, as required by State law. In addition, when unique situations present themselves, housing projects would likely undergo a more comprehensive environmental review, where any impacts identified with the project would be addressed through mitigation specific to the impact.

## 3.1 Aesthetics

### 3.1.1 Environmental Setting

The City of Manhattan Beach (City) is located in the southwest portion of Los Angeles County (County) along the Pacific Ocean, approximately 19 miles southwest of Downtown Los Angeles. The City is bordered by the City of El Segundo and the Chevron Oil Refinery to the north, the cities of Redondo Beach and Hawthorne to the east, the City of Hermosa Beach to the south, and the Pacific Ocean to the west. The City is almost entirely built out and contains vegetation that is ornamental. Despite dense urbanization, there are a number of scenic resources in the City as well as in the broader Los Angeles County, including mountains, foothills, ridgelines, forests, deserts, beaches, and coastlines. Scenic resources visible throughout the City include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, and, most predominantly, the City's

two miles of beach frontage to the west (City of Manhattan Beach 2003). Additionally, Pacific Coast Highway (PCH) bisects the City in a north/south direction. PCH is a Caltrans facility, also known as State Route 1, which connects the coastal cities of Los Angeles County to other coastal communities in northern and southern California. While certain extents of PCH provide opportunities to view the coastline, there are no coastal views accessible where the highway (i.e., Sepulveda Boulevard) traverses the City. The City also has designated “walk streets” which are defined in the MBMC as “dedicated public streets which have been closed to vehicular traffic” (City of Manhattan Beach 2001). Walk streets primarily run east to west throughout the coastal zone, traversing through medium and high-density residential neighborhoods and providing beach access to the public (City of Manhattan Beach 2003).

### 3.1.2 Regulatory Setting

#### Federal

There are no federal regulations pertaining to aesthetics and scenic resources that would apply to the HEU.

#### State

##### California Scenic Highway System

Created by the California State Legislature in 1963, the California Scenic Highway Program includes highways designated by the California Department of Transportation (Caltrans) as scenic. The purpose of the program is to protect the scenic beauty of California highways and adjacent corridors through conservation and land use regulation.

##### California Code of Regulations

###### Title 24 – California Building Standards Code

Title 24, California Building Standards Code, consists of regulations to control building standards throughout the state. The following components of Title 24 include standards related to lighting:

###### Title 24, Part 1 – California Building Code / Title 24, Part 3 – California Electrical Code

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

###### Title 24, Part 6 – California Energy Code

The California Energy Code (CEC) (Title 24, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. Section 130.2 sets forth requirements for Outdoor Lighting Controls and Luminaire Cutoff requirements. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare (BUG) ratings in accordance with IES TM-15-11, Addendum A, and shall be provided with a minimum of 40% dimming capability activated to full on by motion sensor or other automatic control. This requirement does not apply to streetlights for the public right of way, signs, or building facade lighting.

Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in Section 10-114 of the CEC. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Facade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

## California Coastal Act of 1976

The California Coastal Act (California Public Resource Code sections 30000 et seq.) was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100-mile coastline for the benefit of current and future generations. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the California Coastal Act (CCA) to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. The Coastal Act requires local governments (15 coastal counties and 59 cities) to create and implement Local Coastal Programs (LCPs) that incorporate policies to protect, enhance and restore environmentally sensitive habitats, including intertidal and nearshore waters, wetlands, bays and estuaries, riparian habitat, certain wood and grasslands, streams, lakes and habitat for rare or endangered plants or animals, as well as the scenic beauty of coastal landscapes and seascape.

## Local

### City of Manhattan Beach General Plan

The following goals and policies from the City's General Plan relate to aesthetics and aesthetic impacts.

Goal CR-4: Preserve the existing landscape resources in the City and encourage the provision of additional landscaping.

Policy CR-4.1: *Protect existing mature trees throughout the City and encourage their replacement with specimen trees whenever they are lost or removed.*

Policy CR-4.4: *Review the tree ordinance to consider its application citywide and to determine the need to strengthen tree preservation criteria.*

Policy CR-4.5: Discourage the reduction of landscaped open space and especially the removal of trees from public and private land.

Policy CR-4.6: Prepare lists of appropriate landscaping materials for the climate and encourage residents and businesses to use them.

Goal LU-1: Maintain the low-profile development and small-town atmosphere of Manhattan Beach.

Policy LU-1.1: Limit the height of new development to three stories where the height limit is thirty feet, or to two stories where the height limit is twenty-six feet, to protect the privacy of adjacent properties, reduce shading, protect vistas of the ocean, and preserve the low-profile image of the community.

Goal LU-3: Achieve a strong, positive community aesthetic.

Policy LU-3.1: Continue to encourage quality design in all new construction.

Policy LU-3.2: Promote the use of adopted design guidelines for new construction in Downtown, along Sepulveda Boulevard, and other areas to which guidelines apply.

Policy LU-3.6: Encourage the beautification of the walkstreets, particularly through the use of landscaping.

Goal LU-4: Preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood's unique characteristics.

Policy LU-4.1: Protect public access to and enjoyment of the beach while respecting the privacy of beach residents.

Policy LU-4.4: Encourage the preservation and enhancement of unique residential homes and buildings throughout Manhattan Beach to preserve the culture and history of the City.

Policy LU-4.5: Encourage measures that recognize and work to protect buildings, landscaping, and other features important to the City's history.

Policy LU-4.6: When public improvements are made, they should preserve and maintain distinctive neighborhood characteristics.

Goal LU-5: Protect residential neighborhoods from the intrusion of inappropriate and incompatible uses.

Goal LU-7: Continue to support and encourage the viability of the Downtown area of Manhattan Beach.

Policy LU-7.6: Recognize the unique qualities of mixed-use development and balance the needs of both commercial and residential uses.

### Housing Element (2021)

The proposed Housing Element includes goals and policies to enhance the aesthetic quality of neighborhoods and housing environments including the following:

Policy 3.1: Eliminate potentially unsafe or unhealthy conditions in existing residential developments.

Program 8: Ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections.

Program 23: Amend the MBMC to eliminate provision 10.52.050.F such that all parcels operating as one site would be subject to existing maximum lot size requirements. This would help deter "mansionization" or construction of overly large dwellings that are out of scale with the surrounding neighborhoods.

## Manhattan Beach Municipal Code

### Section 7.36.150, Encroachment standards

This section requires avoidance of any obstruction to neighboring residents' scenic vistas and views caused by built structures, landscaping design, or otherwise. This section also includes design provisions for private and public structures (including private residences, fences, retaining walls, etc.) adjacent to City designated walk streets.<sup>8</sup>

### Chapter 7.48 – Coastal Zone

Within the City's coastal zone, as defined in Division 20 of the Public Resources Code and in Chapter 2.A of the certified Local Coastal Plan (LCP), all development, including changes in availability of public access and/or public parking, require a coastal development permit (CDP) and are governed by the provisions of Chapter 2.A and Division 20 of the Public Resources Code. Chapter 7.36, Encroachment Permit, is part of the City's certified LCP.

### Planning and Zoning Ordinance (Title 10)

The Planning and Zoning Ordinance sets forth requirements and design standards for base and overlay districts, as well as site specific requirements applicable to residential districts. This includes provisions related to appropriate exterior building materials, height, building and lot size requirements, establishing contingency fees to maintain the aesthetic quality of condominiums, and general compatibility and design standards for projects within residential areas so as to foster convenient, harmonious, and workable relationships among land uses. In particular Section 10.60.121(D) sets forth performance standards for glare that apply to all land uses, Section 10.52.020 prohibits metallic finishes on the exterior walls of all structures and Section 10.64.170 ensures that adequate lighting is provided for safety will also protecting residential uses from undue glare.

### Tree Preservation

#### Chapter 7.32, Tree, Shrub, and Plant Regulations

Chapter 7.32 establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way. This chapter sets forth measures related to proper selection of species, conditions of protected status, preservation, required permits and fees, and other general provisions related to care, maintenance, and overall aesthetic quality trees, shrubs, and plants in public spaces.

#### Section 10.52.120, Tree preservation and restoration in residential zones, Area Districts I and II.

Regulations provided for in the Section 10.52.120 are designed to preserve and enhance the existing healthy tree canopies on individual residential properties as well as the overall neighborhood. The design of residences, including grading, driveways, walkways, patios, utilities and right-of-way improvements, are required to consider and accommodate existing healthy protected trees, as reasonably feasible. For the purposes of this section a "protected tree" is defined as: any species of tree, (excluding deciduous fruit-bearing trees and *Washingtonia* species palms) the trunk of which is located at least partially within the required front yard or street side yard (on corner lots) of a site, with a trunk diameter of twelve inches (12") or greater or multiple trunks totaling twelve inches (12") in diameter or greater at a height of four and one-half feet (4.5') from existing grade; and any replacement tree required.

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<sup>8</sup> A "walk street" is defined in the Manhattan Beach Municipal Code as any street where vehicular use is prohibited.

City of Manhattan Beach Local Coastal Program

The Manhattan Beach Local Coastal Program (LCP), which has been certified by the California Coastal Commission, is the basic planning tool used by Manhattan Beach to guide development in the coastal zone. The LCP contains the foundation policy for future development and protection of coastal resources. The LCP specifies appropriate location, type, and scale of new or changed uses of land and water. The LCP contains a designation in the Zoning Map and measures to implement the plan. Prepared by the City, this program governs decisions that determine the short- and long-term conservation and use of coastal resources. While the LCP reflects the unique characteristics of Manhattan Beach, the LCP must also be consistent with the CCA goals and policies. The CCA requires consistency between the LCP and General Plan. Section 30500.1 of the CCA provides that an LCP is not required to include housing policies and programs. However, Section 30007 states that local governments are not exempt from meeting requirements of state and federal law with respect to providing low- and moderate-income housing or other obligations related to housing. In those circumstances where an issue is addressed by both the LCP and General Plan, the terms of the LCP would generally prevail, including as it applies to general development aesthetics, views, and scenic vistas (City of Manhattan Beach 2003).

3.1.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b> – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



a) *Would the project have a substantial adverse effect on a scenic vista?*

**Less Than Significant Impact.** Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines, that are accessible from public vantage points, such as public roadways and parks. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. A substantial adverse effect on a scenic vista would occur if the HEU would significantly degrade the scenic landscape as viewed from public roads or other public areas.

The City's topography consists of rolling hills, which affords public vistas of the two-mile long sandy shore coastline as well as the expansive backdrop of the Pacific Ocean and horizon line. As previously discussed, the HEU consists of a policy document update, and adoption of the HEU alone would not produce environmental impacts. Because all the qualifying sites under consideration for increased development intensity and intervening development are within existing urban and semi-urban built-out areas, the HEU is not anticipated to have a substantial adverse effect on scenic vistas within the City. Further, there are a variety of existing regulatory processes that would serve to minimize any potential impacts related to future residential development facilitated by the Housing Element. Several sections provided for in the Planning and Zoning Ordinance (Title 10 of the MBMC) regulate physical development by controlling not only the appearance of new residential development, but also the placement of new development, so as to create housing that is "harmonious" within the context of the surrounding houses and neighborhood (refer to Regulatory Setting, above). MBMC Section 7.36.150 applies to certain private improvements in the public right-of-way (e.g., retaining walls, staircases, landscaping) in order to avoid obstructions to public scenic vistas and views. In addition, all development taking place within the LCP boundary area would be subject to additional provisions set forth in the City's LCP, which identifies the location, type, densities, and other ground rules for development in the coastal zone, including the provision to enhance and protect the scenic beauty of coastal landscapes (City of Manhattan Beach 2003). Compliance with provisions of the Planning and Zoning Ordinance as well as the CCA and LCP would be ensured through the City's development review and building permit process.

Additionally, according to the City's General Plan EIR, there are no officially designated scenic vistas in the City. However, the Land Use Element of the General Plan includes several goals and policies aimed at minimizing potentially adverse view impacts, including Policy LU-1.1 which limits the height of new development to two or three stories to "protect vistas of the ocean". A number of other General Plan goals and policies listed above in the Regulatory Setting section above would also serve to minimize potential impacts by preventing degradation of existing vistas and promoting actions that would make existing scenic vistas more accessible, such as Goal 4 and Policy LU-4.1.

Ultimately, potential aesthetic-related impacts are location specific and cannot be assessed in a meaningful way until the location of a project sites are known and the development planned on those sites is defined. While the future rezoning program, which would be undertaken as an action separate from the adoption of the HEU, would allow for greater intensities than previously permitted in certain areas of the City, the existing regulatory setting and the infill locations selected as part of HEU sites analysis would ensure that future potential impacts to scenic vistas associated with adoption of the HEU would be less than significant. Additionally, approval of the HEU itself, as a policy document update, would not provide any goals, policies, or programs that would significantly degrade the scenic resources of the City. Furthermore, the HEU includes goals and policies to enhance the aesthetic quality of neighborhoods and housing environments,

such as eliminating potentially unsafe or unhealthy conditions in existing residential developments (Policy 3.1), implementing a renewed effort to enforce building code compliance of existing and proposed residential housing (Program 8), and continuing to deter construction of overly large dwellings that are out of scale with the surrounding neighborhoods (Program 23). Therefore, impacts to scenic vistas would be less than significant and no mitigation is required.

**b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

**No Impact.** As discussed above under Regulatory Setting, the California Scenic Highway Program includes highways designated by Caltrans as scenic. There are currently no designated state scenic highways or eligible state scenic highways in the City of Manhattan Beach. The nearest eligible scenic highway, Route 1, runs from Route 187 near the City of Santa Monica (approximately 6.38 miles northwest of the Project site), to Route 101 near El Rio in Ventura County. The nearest officially designated State scenic highway, Route 27 near the Topanga State Park, is located approximately 13 miles northwest of the Project site (Caltrans 2021). Due to distance, intervening terrain, and intervening development, the HEU would not be visible from the eligible State scenic segment of Route 1 nor the officially designated State scenic highway segment of Route 27, and no impacts would occur.

**c) *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

**Less Than Significant Impact.** California Public Resources Code Section 21071 defines an “urbanized area” as “(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.” As previously discussed, the project would be required to comply with existing State and local regulations and would be consistent with the General Plan Goals and Policies governing scenic quality. This includes consistency with Goal LU-4, to preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood’s unique characteristics. In addition, provisions of the Planning and Zoning Ordinance regulate physical development by controlling not only the appearance of new residential development, but also the placement of new development, so as to ensure aesthetic compatibility. In addition, sites identified within the LCP Boundary, including the currently proposed Verandas at 401 Rosecrans Avenue project, would be required to comply with LCP and CCA regulations, including the provision to protect the scenic qualities of coastal landscapes (City of Manhattan Beach 2003).

According to the General Plan Community Resources Element (2003), trees on both public and private property provide tremendous value, aesthetic and otherwise, to all City residents, and the City is committed to preserving existing trees and expanding the urban forest by replacing damaged or dying trees and planting new trees. In addition, the Community Resources Element states that well-maintained landscaping can beautify property, adding character and uniqueness to private and public areas. As such, the City’s General Plan includes several Goals and Policies related to the preservation and maintenance of trees and landscaping, including Goal CR-4 which requires that new development proposals preserve existing

landscape resources in the City, and encourages the provision of additional landscaping (see Regulatory Framework for specific General Plan Policies related to landscaping and tree preservation). In addition, the City's MBMC establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way (Chapter 7.32, Tree, Shrub, and Plant Regulations), as well as measures to preserve and enhance the existing healthy tree canopies on individual residential properties and neighborhoods in Areas 1 and 3 (Section 10.52.120, Tree preservation and restoration in residential zones, Area Districts I and II).

The project would not, in and of itself, result in impacts to scenic resources or visual character, and would not conflict with applicable zoning and other regulations governing scenic quality. As discussed, all future rezoning efforts or residential development projects would require program or project-specific environmental evaluation to determine that any potential impacts are less than significant. In addition, potential aesthetic-related impacts are location specific and cannot be assessed in a meaningful way until the project site parcels are confirmed and the development planned on those sites is defined. Therefore, no significant impact would result from implementation of the HEU with respect to the degradation of the existing visual character and/or quality of the site, and impacts would be less than significant. No mitigation is required.

**d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

**Less Than Significant Impact.** Lighting is of most concern when it has the potential to spill over or trespass from a project site onto sensitive surrounding land uses, such as residential properties, resulting in a potential nuisance. Extraneous glare is associated with the use of highly reflective building materials (glass, steel etc.). The proposed HEU will not, in and of itself, create sources of substantial light or glare that adversely affect views. The future rezoning program would occur in an urbanized context and be evaluated separately at the time when parcels for rezoning are fully identified.

As described in Threshold 3.1(c), while the HEU consists of a policy document update that is not anticipated to produce environmental impacts, the City has identified qualifying sites within the CG, PD, RM, and RS zones that could be included in the future rezoning effort and would therefore allow for greater densities than are currently allowed. However, as discussed, the implementation of any overlay or rezoning effort would require future CEQA review and discretionary approval.

The adoption of the HEU would ultimately encourage additional development in certain preidentified areas throughout the City; however, the City's Planning and Zoning Ordinance (Title 10 of the MBMC) contains provisions intended to limit adverse light and glare impacts. Section 10.60.121(D) sets forth performance standards for glare that apply to all land uses, while Section 10.52.020 prohibits metallic finishes on the exterior walls for all structures (other than accessory structures) within residential areas. In addition, Section 10.64.170 regulates exterior lighting, and is intended to ensure that adequate lighting is provided for personal and traffic safety while also protecting nearby residential uses from undue glare. Provisions of this section include required shielding, height restrictions, and maximum acceptable levels of illumination within range of residential uses.

Ultimately, potential light and/or glare related impacts are location specific and cannot be assessed in a meaningful way until the location of a project site is known and the development planned on those sites is defined. At such time that a development proposal is considered that project will be subject to adopted development guidelines/standards, and any impacts identified with the development project will be addressed through mitigation measures specific to the impact. In addition, all future projects would be required to comply with applicable MBMC standards which would further reduce the potential for significant impacts. As such, and with compliance with applicable City and State regulations, the HEU would have a less than significant impact regarding the creation of a new source of substantial light or glare, which would adversely affect day or nighttime views in the area, and no mitigation is required.

### 3.1.4 References

Caltrans (California Department of Transportation). 2021. California State Scenic Highway System. Accessed September 17, 2021. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983>.

City of Manhattan Beach. 2001. Manhattan Beach Municipal Code. Revised and republished 2001. Accessed September 19, 2021. [https://library.municode.com/ca/manhattan\\_beach/codes/code\\_of\\_ordinances?nodeId=MANHATTAN\\_BEACH\\_CALIFORNIAMUCO](https://library.municode.com/ca/manhattan_beach/codes/code_of_ordinances?nodeId=MANHATTAN_BEACH_CALIFORNIAMUCO).

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

## 3.2 Agriculture and Forestry Resources

### 3.2.1 Environmental Setting

#### Mapped Important Farmland

The California Department of Conservation (CDOC) and U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) classify agricultural lands into five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential. Non-farmlands are classified as Grazing Land, Urban and Built-Up Land, Other Land, or Water. The City of Manhattan Beach is classified as Urban and Built-Up land by the CDOC Farmland Mapping and Monitoring Program (FMMP), defined as land used for residential, industrial, commercial, construction, institutional, public administrative purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. This classification also includes vacant and nonagricultural land which is surrounded by urban development and is less than 40 acres (CDOC 2021a, 2021b).

#### Forests

Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (California Public

Resources Code Section 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (California Public Resources Code Section 4526). Pursuant to these definitions, there are no forests, forest land, or timber land in the City of Manhattan Beach.

## 3.2.2 Regulatory Setting

### Federal

There are no federal regulations pertaining to farmland and forestry resources that would apply to the HEU.

### State

#### State Farmland Mapping and Monitoring Program

The goal of the state FMMP is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California’s agricultural land resources. FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every 2 years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. Data are also released in statistical formats—principally the biennial California Farmland Conversion Report.

#### California Land Conservation Act (Williamson Act)

The Williamson Act provides tax incentives to retain prime agricultural land and open space in agricultural use, which subsequently slows its conversion to urban development. The Williamson Act requires a 10-year contract between the County and landowners who enter into contracts with local government for long-term use restrictions on qualifying agricultural and open space land. In accordance with the contract, the land must be taxed based on its agricultural use rather than its full market value. The overall purpose of the Williamson Act is to protect agricultural lands and open space.

### Local

As there is no farmland, forestland, or timberland within City of Manhattan Beach, there are no local regulations related to agriculture or forestry resources that would apply to the HEU.

### 3.2.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** As discussed above, the City of Manhattan Beach is classified entirely as Urban and Built-Up land by the CDOC FMMP, and there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance identified within the City’s boundaries. (DOC 2021a). Therefore, implementation of the HEU would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

**No Impact.** The City of Manhattan Beach has no zoning for agricultural use and no land subject to a Williamson Act contract. While the City does have a limited amount of designated open space, none of this land is zoned for agricultural use. Further, the HEU does not propose any changes to lands currently zoned as Open Space (OS) by the City's Zoning Designations map (City of Manhattan Beach 2004). Therefore, the HEU would not conflict with existing zoning for agricultural use, or a Williamson Act contract. The HEU would therefore have no impact.

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

**No Impact.** As previously discussed, there are no parcels within the City that are zoned as forest land or timberland. Additionally, there is no forest land or any land that is designated for the purposes of conserving forest land within the City. Therefore, the HEU would have no impact on forest or timberland.

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

**No Impact.** There are no parcels within the City that are zoned as forest land. Additionally, there is no forest land or any land that is designated for the purposes of conserving forest land within the City. Therefore, the HEU would not result in the loss of forestland or conversion of forest land to non-forest use, and no impact would occur.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

**No Impact.** While there is no forestland or land zoned for agricultural use within the City, there is a limited amount of designated Open Space. The HEU does not propose to make any changes to parcels currently zoned Open Space (OS). As such, the HEU would not involve changes that could result in the conversion of Farmland to non-agricultural uses or forest land to non-forest use. No impact would occur.

### 3.2.4 References

CDOC (California Department of Conservation). 2021a. California Important Farmland Finder. Accessed September 23, 2021. <https://maps.conservation.ca.gov/DLRP/CIFF/>

CDOC. 2021b. Important Farmland Mapping Categories and Soil Taxonomy Terms. Accessed September 23, 2021. [https://www.conservation.ca.gov/dlrp/fmmp/Documents/soil\\_criteria.pdf](https://www.conservation.ca.gov/dlrp/fmmp/Documents/soil_criteria.pdf)

City of Manhattan Beach, 2004. City of Manhattan Beach Zoning Designations (Map). Adopted August 2004. Accessed September 23, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/76/637364644090270000>

## 3.3 Air Quality

### 3.3.1 Environmental Setting

Ambient air quality is generally affected by climatological conditions, the topography of the air basin, the type and amounts of pollutants emitted, and, for some pollutants, sunlight. The City is located within South Coast Air Basin (SCAB). Topographical and climatic factors in the SCAB create the potential for high concentrations of regional and local air pollutants. This section describes relevant characteristics of the air basin, types of air pollutants, health effects, and existing air quality levels.

The SCAB includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and State standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), particulate matter equal to or less than 10 microns in aerodynamic diameter (PM<sub>10</sub>), particulate matter equal to or less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>), and lead (Pb). In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

### 3.3.2 Regulatory Setting

#### Federal

##### Federal Clean Air Act

The federal Clean Air Act passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The U.S. Environmental Protection Agency (EPA) is responsible for implementing most aspects of the Clean Air Act, including the setting of National Ambient Air Quality Standards (NAAQS; federal standards) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emissions standards and permits, acid rain control measures, stratospheric O<sub>3</sub> protection, and enforcement provisions. Federal standards are established for criteria pollutants under the Clean Air Act, which are O<sub>3</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead.

The federal standards describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The federal standards (other than for O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. Federal standards for O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the federal standards at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the federal standards must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.



The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the federal standards to the states. In California, the task of air quality management and regulation has been legislatively granted to California Air Resources Board (CARB), with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels.

## State

### California Clean Air Act

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. As stated previously, an ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below these relevant CAAQS before a basin can attain the corresponding CAAQS. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O<sub>3</sub>, CO, SO<sub>2</sub> (1-hour and 24-hour), NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded.

### Toxic Air Contaminants

The State Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California toxic air contaminant (TAC) list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with Assembly Bill (AB) 2728, the State list includes the (federal) HAPs. Furthermore, in 1987, the Legislature enacted the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) to address public concern over the release of TACs into the atmosphere. In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. The regulation would result in an 80% decrease in Statewide diesel health risk in 2020 compared with the diesel risk in 2000. Other Airborne Toxic Control Measures that reduce diesel emissions, including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

## Regional/Local

### South Coast Air Quality Management District (SCAQMD)

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, State, and local air pollution control regulations in the SCAB, where the project site is located. The SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to

attain State and federal ambient air quality standards in the SCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

The most-recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD governing board on March 3, 2017. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP addresses criteria air pollutant emissions from ocean-going vessels, which are considered federal sources, and includes emissions associated with marine vessels and engines in the baseline year and future forecasts. The 2016 AQMP's overall control strategy is an integral approach relying on fair-share emission reductions from federal, State, and local levels. The 2016 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources (SCAQMD 2017). These control strategies are to be implemented in partnership with CARB and the EPA.

### Potentially Applicable Rules

Emissions that would result from stationary and area sources during construction and operation be subject to SCAQMD rules and regulations. The SCAQMD rule applicable to construction of residential dwelling units within the City may include the following:

**Rule 403:** Fugitive Dust. This rule requires fugitive dust sources to implement best available control measures for all sources to ensure all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (SCAQMD 2005). South Coast Air Basin Attainment Designation (SCAB)

Pursuant to the 1990 federal Clean Air Act amendments, the EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on CAAQS rather than the NAAQS.

The SCAB is designated as a nonattainment area for federal and state O<sub>3</sub> standards and federal and State PM<sub>2.5</sub> standards. The SCAB is designated as a nonattainment area for state PM<sub>10</sub> standards; however, it is designated as an attainment area for federal PM<sub>10</sub> standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and State NO<sub>2</sub> standards, and federal and State SO<sub>2</sub> standards. While the SCAB has been designated as nonattainment for the federal rolling three-month average lead standard, it is designated attainment for the State lead standard (CARB 2020; EPA 2021).

### Southern California Association of Governments (SCAG)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

On September 3, 2020, SCAG’s Regional Council voted to approve the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)). The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region’s future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2020).

### City of Manhattan Beach General Plan

The following goals and policies related to air quality are applicable to the HEU.

Goal CR-6: Improve air quality.

Policy CR-6.1: Encourage alternative modes of transportation, such as walking, biking, and public transportation, to reduce emissions associated with automobile use.

Policy CR-6.3: Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.

Policy CR-6.4: Cooperate and participate in regional air quality management planning, programs, and enforcement measures.

### 3.3.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?***

**Less Than Significant Impact.** The HEU is a policy document for future actions that would occur within the SCAB, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the SCAQMD.

The SCAQMD administers the AQMP for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all CAAQS and NAAQS. The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region’s ability to comply with federal and state air quality standards. The relevant criteria are as follows discussed below (SCAQMD 1993):

**Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.

The HEU is a policy document and adoption will not directly result in short-term construction or long-term operational emissions. In addition, future residential projects would be required to demonstrate that they would not conflict with the applicable SCAQMD AQMP, and potential project-specific short- and long-term impacts to air quality would be assessed at the time the projects are proposed. Furthermore, future development that is envisioned within, yet not permitted directly by, the HEU would be subject to federal, State, and local ambient air quality standards. Therefore, the HEU would not conflict with Consistency

Criterion No. 1 because it would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay the timely attainment of air quality standards of interim emission reductions specified in the AQMP.

**Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG for its RTP/SCS to develop the emission inventory for the 2016 AQMP (SCAQMD 2017). The RTP/SCS's forecasts are in turn based on general plans for cities and counties in the SCAB.<sup>9</sup> The SCAG 2016 RTP/SCS and associated Regional Growth Forecast are also generally consistent with the local plans. Therefore, the 2016 AQMP is generally consistent with local government plans through its use of information in SCAG's RTP/SCS.

The City has been assigned a RHNA of 774 units for the 2021–2029 Housing Element which consists 332 very-low-income units, 165 low-income units, 155 moderate income units, and 132 above-moderate income units (SCAG 2021). This level of growth is consistent with the General Plan, and the HEU is intended to conform with the 2021-2029 update cycle for jurisdictions in the SCAG region. Therefore, the HEU will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase. The HEU does not conflict with the AQMP and would not increase population growth beyond what is forecasted in the most recently adopted AQMP.

Based on the considerations presented for the two criteria, the HEU will not conflict with or obstruct the implementation of the 2016 AQMP, and impacts relating to the HEU's potential to conflict with, or obstruct implementation of, the applicable AQMP would be less than significant.

- b) ***Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

**Less Than Significant Impact.**

The HEU is a policy document and as such does not propose specific development projects, but facilitates density needed to accommodate the 6<sup>th</sup> cycle RHNA allocation. Because specific projects are not known at this time and the HEU merely identifies potential capacity for future units that could be constructed, the City cannot assess the specific impacts of development in qualitative terms. All future housing development projects built under the HEU would be subject to the policies listed above, and if unique circumstances are present such that future housing development was not allowed by-right or eligible for streamlining or a CEQA exemption, would undergo project specific environmental review.

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<sup>9</sup> Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled (VMT) and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

Nonetheless, it is acknowledged that future development associated with the HEU could result in an increase in criteria pollutants during construction activities, such as excavation and grading, and operational activities, which could also contribute to the nonattainment status (O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) of the SCAB. Fugitive dust emissions would result from land clearing, grading operations, and construction equipment operations over the unpaved project site. Combustion emissions, such as NO<sub>x</sub> and PM<sub>10</sub>, are most significant when using large diesel-fueled scrapers, loaders, bulldozers, haul trucks, compressors, generators, and other types of equipment. All future projects built under the HEU would be required to comply with all regional and local regulations such as with SCAQMD Rule 403 to control dust emissions during any dust-generating activities.

Regarding potential operational impacts, proposed future development, which would be residential in character, would not result in a significant long-term impact to air quality. The HEU anticipates population and housing growth consistent with the Land Use Element as well as regional plans to accommodate growth based on household size and dwelling unit potential for this planning period, which, as described above, is in turn consistent with the assumptions in the 2016 AQMP. Most projects facilitated by the HEU would be small in nature and would not be expected to exceed the SCAQMD emission thresholds. In addition, projects that are proposed under the HEU would be subject to the policies listed above, and if unique circumstances are present such that future housing development was not allowed by-right or eligible for streamlining or a CEQA exemption, would undergo project specific environmental review. Furthermore, the HEU has policies and programs designed to promote infill development, encourage mixed use, promote housing within walking or biking distance of employment or school, and encourage downtown housing close to jobs, services, government, recreation, and more. The Community Resources Element of the City's General Plan also contains policies to ensure air quality impacts are reduced, as follows:

Policy CR-6.1: Encourage alternative modes of transportation, such as walking, biking, and public transportation, to reduce emissions associated with automobile use.

Policy CR-6.3: Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.

Policy CR-6.4: Cooperate and participate in regional air quality management planning, programs, and enforcement measures.

As stated above, the HEU is a policy document and as such does not propose specific development projects. The HEU would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. Therefore, potential air quality impacts would be less than significant.

c) ***Would the project expose sensitive receptors to substantial pollutant concentrations?***

**Less Than Significant Impact.** The HEU does not propose specific development plans and merely identifies how the City will go about providing the capacity for a total of 479 new units between 2021 and 2029; therefore, potential air quality impacts including potential sensitive receptors are unknown at this time. However, future development is expected to be primarily infill development, which could potentially be located in close proximity to other residences, schools, and/or parks and would be subject to policies and standards presented by SCAQMD, as well as the General Plan and MBMC for construction standards regarding air quality. Additionally, CARB has published the *Air Quality and Land Use Handbook: A*

*Community Health Perspective* (CARB 2005), which identifies certain types of facilities or sources that may emit substantial quantities of toxic air contaminants (TACs) and therefore could conflict with sensitive land uses, such as “schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities.” The facilities or sources that may emit substantial quantities of TACs include the following:

- High-traffic freeways and roads
- Distribution centers
- Rail yards
- Ports
- Refineries
- Chrome plating facilities
- Dry cleaners
- Large gas dispensing facilities.

The *Air Quality and Land Use Handbook* is a guide for siting of new sensitive land uses, but it does not mandate specific separation distances to avoid potential health impacts. CARB recommends that sensitive receptors not be located downwind or in proximity to such sources to avoid potential health hazards. The HEU is focused on development of housing and would not include any of the previously listed land uses that may emit substantial quantities of TACs.

The greatest potential for TAC emissions would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks during the future residential development’s construction activities and the associated potential health impacts to sensitive receptors. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual receptor; however, such assessments should also be limited to the period/duration of activities associated with the project. As previously discussed, specific projects are not identified and the HEU is a policy document, adoption will not result in direct short-term construction emissions. Furthermore, future residential development would also not require the extensive operation of heavy-duty diesel construction equipment and diesel trucks, which are subject to a CARB Airborne Toxics Control Measure to reduce DPM emissions.

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate the potential of localized air quality impacts to sensitive receptors in the immediate vicinity of a project from construction and operation; however, an operational LST analysis is only applicable to land uses with on-site emission sources and is generally not applicable to residential land uses as they do not include substantial on-site sources of localized emissions. In addition, the LST methodology was developed to be used as a tool to assist lead agencies to analyze localized impacts associated with project-level impacts. However, the LSTs are applicable to projects at the project-specific level and are not applicable to regional projects, such as the HEU, as specific projects have not been identified at this time. Therefore, neither a construction nor an operational LST analysis is recommended or provided herein.

Localized carbon monoxide (CO) impacts or CO hotspots can be associated with heavily congested intersections. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities; therefore, the potential for CO hotspots in the SCAB is steadily decreasing. The SCAQMD conducted CO modeling for the 2003 AQMP<sup>10</sup> for the four worst-case intersections in the SCAB. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day; however, the peak modeled CO 1-hour concentration was estimated to be 4.6 while the CAAQS is 20 ppm. Similarly, the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the HEU is a policy document and does not include specific development, it would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day; therefore, a CO hotspot is not anticipated to occur and associated impacts would be less than significant.

Regarding health effects associated with criteria air pollutants, health effects associated with O<sub>3</sub> include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue; health effects associated with NO<sub>x</sub> include lung irritation and enhanced allergic responses; health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness; and health effects associated with particulate matter (PM<sub>10</sub>) include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2021). Because the HEU is a policy document, it is not directly anticipated to generate construction or operational criteria air pollutant emissions or potential associated health effects.

Therefore, the HEU would not expose students, faculty, children, elderly and other sensitive receptors to toxic air contaminant (TAC) emissions from these sources. As such, impacts would be less than significant

**d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

**No Impact.** The HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of 479 new units, and adoption will not, in itself, result in environmental impacts. No odors would be generated by adopting this policy document; as such, no impacts would occur.

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<sup>10</sup> SCAQMD's CO hotspot modeling guidance has not changed since 2003.



### 3.3.4 References

- CARB (California Air Resources Board). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005. Accessed August 2016. <http://www.arb.ca.gov/ch/landuse.htm>.
- CARB. 2020. "Area Designation Maps/State and National." Last updated October 2020. <http://www.arb.ca.gov/desig/adm/adm.htm>.
- CARB. 2021. "Common Air Pollutants." <https://ww2.arb.ca.gov/resources/common-air-pollutants>.
- City of Manhattan Beach. 2021. Manhattan Beach Powered by 100% Green, Renewable Energy. Accessed October 28, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/48048/637691230191730000>.
- EPA (U.S. Environmental Protection Agency). 2021. "Region 9: Air Quality Analysis, Air Quality Maps." Last updated June 10, 2021. <http://www.epa.gov/region9/air/maps/>.
- SCAG (Southern California Association of Governments). 2020. *The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, Connect SoCal*. <https://www.connectsocial.org/Documents/Adopted/fConnectSoCal-Plan.pdf>.
- SCAG. 2021. SCAG 6<sup>th</sup> Cycle Final RHNA Allocation Plan. Accessed September 13, 2021. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899>
- SCAQMD (South Coast Air Quality Management District). 1993. *CEQA Air Quality Handbook*.
- SCAQMD. 2017. *2016 Final Air Quality Management Plan*.

## 3.4 Biological Resources

### 3.4.1 Environmental Setting

Manhattan Beach is a built-out urban community. There are no riparian habitats, wetlands, or other sensitive habitat conservation areas within the City (City of Manhattan Beach 2003a). Inland environmentally sensitive areas in the City are generally zoned and protected as parklands (City of Manhattan Beach 2003b). However, the City has two miles of beach frontage and 40 acres of recreational beach area. A significant portion of the City is within the City and State designated coastal zone, wherein impacts to coastal resources are always of concern (City of Manhattan Beach 2003b).

Policies governing land use in the coastal zone constrain residential development to some extent, but they are necessary to support the Local Coastal Plan (LCP) and California Coastal Act (CCA) policies, described below, including the protection, enhancement and restoration of coastal environmentally sensitive habitats, such as intertidal and nearshore waters and habitat for rare or endangered plants or animals (City of Manhattan Beach 2003b).

## 3.4.2 Regulatory Setting

### Federal

#### Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 provides legislation to protect federally listed plant and animal species. Impacts to listed species resulting from the implementation of a project would require the responsible agency or individual to formally consult with the U.S. Fish and Wildlife Service (USFWS) or National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries) to determine the extent of impact to a particular species. If the USFWS or NOAA Fisheries determine that impacts to a federally listed species would likely occur, alternatives and measures to avoid or reduce impacts must be identified. The USFWS and NOAA Fisheries also regulate activities conducted in federal critical habitat, which are geographic units designated as areas that support primary habitat constituent elements for listed species.

#### Federal Water Pollution Control Act of 1972

Under Section 404 of the Federal Water Pollution Control Act (also referred to as the Clean Water Act [CWA]), the U.S. Army Corps of Engineers (USACE), with U.S. Environmental Protection Agency (EPA) oversight, has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other “waters of the United States.” Perennial and intermittent creeks are considered waters of the United States if they have a “significant nexus” to traditional navigable waters, interstate waters, or territorial seas. In achieving the goals of the CWA, the USACE seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional “waters of the United States” would require a Section 404 permit from the USACE prior to the start of work. In 2008, the EPA and USACE, through a joint rulemaking, expanded the Section 404(b)(1) guidelines to include more comprehensive standards for compensatory mitigation. These standards include ensuring that unavoidable impacts subject to regulation under the CWA are replaced to promote no net loss of wetlands. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetlands is met by compensatory mitigation; in general, the type and location options for compensatory mitigation should comply with the hierarchy established by the USACE/EPA 2008 Mitigation Rule (in descending order): (1) mitigation banks; (2) in-lieu fee programs; and (3) permittee-responsible compensatory mitigation. Also, in accordance with Section 401 of the CWA, applicants for a Section 404 permit must obtain water quality certification from the appropriate Regional Water Quality Control Board (RWQCB). The USACE, RWQCB, and California Department of Fish and Wildlife (CDFW) typically take jurisdiction over wetlands that exhibit three parameters: suitable wetland hydrology, hydric soils, and hydrophytic vegetation. The RWQCB will also consider features with saturated, anaerobic-condition wetlands.

#### **Migratory Bird Treaty Act of 1918**

The Migratory Bird Treaty Act (MBTA) of 1918 protects all migratory birds, including their eggs, nests, and feathers. The MBTA was originally drafted to put an end to the commercial trade in bird feathers, popular in the latter part of the 1800s. The MBTA is enforced by the USFWS, and potential impacts to species protected under the MBTA are evaluated by the USFWS in consultation with other federal agencies.

## State

### California Endangered Species Act

The California Endangered Species Act (CESA) ensures legal protection for plants listed as rare or endangered and wildlife species formally listed as endangered or threatened. The CDFW also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under State law, the CDFW is empowered to review projects for their potential to impact special-status species and their habitats. Under the CESA, the CDFW reserves the right to request the replacement of lost habitat that is considered important to the continued existence to CESA-protected species.

### California Fish and Game Code

California Fish and Game Code (CFGF) Section 2081 provides for when the CDFW is authorized to issue permit to take a species listed as endangered, threatened, or candidate or a rare plant if the take is incidental to an otherwise lawful activity. CFGF Section 3511 includes provisions to protect fully protected species, such as: (1) Prohibiting take or possession “at any time” of the species listed in the statute, with few exceptions; (2) stating that no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to “take” the species; and (3) stating that no previously issued permits or licenses for take of the species “shall have any force or effect” for authorizing take or possession. The CDFW is unable to authorize incidental take of fully protected species when activities are proposed in areas inhabited by those species. Sections 3503 and 3503.5 of the CFGF state that it is unlawful to take, possess, or destroy the nest or eggs of any bird, with occasional exceptions. In addition, Section 3513 states that it is unlawful to take or possess any migratory bird as designated in the MBTA or any part of such migratory birds except as provided by rules and regulations under provisions of the MBTA. Under CFGF Section 1603, the CDFW is responsible for conserving, protecting, and managing California’s fish, wildlife, and native plant resources. To meet this responsibility, the law requires any person, State or local government agency, or public utility proposing a project that may impact a river, stream, or lake to notify the CDFW before beginning the project. If the CDFW determines that a project may adversely affect existing fish and wildlife resources, a Lake or Streambed Alteration Agreement is required. A Streambed Alteration Agreement lists the CDFW conditions of approval relative to a HEU and serves as an agreement between the City and CDFW for a term of not more than 5 years for the performance of activities subject to this section.

### Native Plant Protection Act

The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (CFGF Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under NPPA Section 1913(c), the owner of land where a rare or endangered native plant is growing is required to notify the department at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

### Porter-Cologne Water Quality Control Act of 1987

The State Water Resources Control Board (SWRCB) and each of the nine local RWQCBs, collectively referred to as the California Water Boards, has jurisdiction over “waters of the State,” which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State pursuant to the Porter-Cologne Water

Quality Control Act (California Water Code Division 7) (Porter-Cologne Act). The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to “isolated” waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction [General DWRs]). The local RWQCB (in this case, the Central Coast RWQCB) implements this general order for isolated waters not subject to federal jurisdiction and is also responsible for the issuance of water quality certifications pursuant to CWA Section 401 for waters subject to federal jurisdiction.

## California Coastal Act

The California Coastal Act (California Public Resource Code sections 30000 et seq.) was enacted by the State Legislature in 1976 to provide long-term protection of California’s 1,100-mile coastline for the benefit of current and future generations. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the CCA to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. The Coastal Act requires local governments (15 coastal counties and 59 cities) to create and implement Local Coastal Programs (LCPs) that incorporate policies to enhance and protect sensitive coastal resources.

## Local

### City of Manhattan Beach General Plan

The following goals and policies from the City’s General Plan relate to biological resources, and biological resources impacts.

Goal CR-4: Preserve the existing landscape resources in the City and encourage the provision of additional landscaping.

Policy CR-4.1: Protect existing mature trees throughout the City and encourage their replacement with specimen trees whenever they are lost or removed.

Policy CR-4.4: Review the tree ordinance to consider its application citywide and to determine the need to strengthen tree preservation criteria.

Policy CR-4.5: Discourage the reduction of landscaped open space and especially the removal of trees from public and private land.

Policy CR-4.6: Prepare lists of appropriate landscaping materials for the climate and encourage residents and businesses to use them.

Goal CR-5: Conserve and protect the remaining natural resources in Manhattan Beach.

Policy CR-5.1: Employ principles of a sustainable environment in the development, operation, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.

## Manhattan Beach Municipal Code

### Tree Preservation

#### Chapter 7.32, Tree, Shrub, and Plant Regulations

Chapter 7.32 establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way. This chapter sets forth measures related to proper selection of species, conditions of protected status, preservation, required permits and fees, and other general provisions related to care, maintenance, and overall aesthetic quality trees, shrubs, and plants in public spaces.

#### Section 10.52.120, Tree preservation and restoration in residential zones, Area Districts I and II.

Regulations provided for in the Section 10.52.120 (Tree Ordinance) are designed to preserve and enhance the existing healthy tree canopies on individual residential properties as well as the overall neighborhood. The design of residences, including grading, driveways, walkways, patios, utilities and right-of-way improvements, are required to consider and accommodate existing healthy protected trees, as reasonably feasible. For the purposes of this section a "protected tree" is defined as: any species of tree, (excluding deciduous fruit-bearing trees and *Washingtonia* species palms) the trunk of which is located at least partially within the required front yard or street side yard (on corner lots) of a site, with a trunk diameter of twelve inches (12") or greater or multiple trunks totaling twelve inches (12") in diameter or greater at a height of four and one-half feet (4.5') from existing grade; and any replacement tree required. The Tree Ordinance requires any person desiring to remove or relocate one or more protected trees must obtain a Tree Permit from the Community Development Department's Planning Division. In addition, replacement trees are required for any protected tree removed.

### City of Manhattan Beach Local Coastal Program

The LCP contains the foundation policy for protection of coastal resources. Prepared by the City, this program governs decisions that determine the short- and long-term conservation and use of coastal resources. While the LCP reflects the unique characteristics of Manhattan Beach, the LCP must also be consistent with the Coastal Act goals and policies. The Coastal Act requires consistency between the LCP and General Plan. In those circumstances where an issue is addressed by both the LCP and General Plan, the terms of the LCP should prevail.

### 3.4.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

**Less Than Significant Impact.** The HEU would not have a substantial adverse effect on special-status species because the sites identified as appropriate for accommodating the City’s 6<sup>th</sup> Cycle RHNA allocation, consisting entirely of urban and semi-urban underutilized parcels, are disturbed, developed, and lack

suitable habitat for special-status species. The potential for any known sensitive species to occur on any parcels identified in the sites analysis as being suitable to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation is very low. In addition, for sites located within the LCP area boundary, the CCA and the LCP are designed to protect sensitive areas from development, including the protection, enhancement, and restoration of environmentally sensitive habitats, such as habitat for rare or endangered plants or animals. Any future development under the HEU within the LCP area boundary will be required to comply with applicable LCP and CCA requirements.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Although the policies and objectives of the HEU facilitate residential development to meet the City's 6<sup>th</sup> Cycle RHNA allocation, the HEU would not alter any local, regional, State, or Federal biological protection standards, nor would they alter the City's existing general plan policies related to protection and preservation of sensitive biological resources. The HEU would not have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species. Therefore, the HEU would have a less than significant impact on biological resources, and no mitigation is required.

- b) ***Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

**Less Than Significant Impact.** The HEU would not have a substantial adverse effect on riparian habitats or other sensitive natural communities identified in local or regional plans, policies, or regulations, by California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) because, as per the City of Manhattan Beach General Plan EIR (2003) there are no riparian habitats or other sensitive habitat conservation areas in the City. Vegetation throughout the City consists primarily of ornamental plantings that do not constitute a sensitive natural community. Several underutilized parcels identified in the HEU sites analysis are located within the LCP area boundary, where impacts to sensitive coastal resources are of particular concern. However, the CCA, LCP and General Plan have been designed to protect sensitive areas from development, including the protection, enhancement and restoration of environmentally sensitive habitats and habitat for rare or endangered plants or animals. Other environmentally sensitive areas outside of the LCP area boundary are generally zoned and protected as parklands (City of Manhattan Beach 2014). Additionally, General Plan Goal CR-5 and Policy CR-5.1 would require the programs proposed in the HEU to conserve and protect the remaining natural resources in the City and employ principles of a sustainable environment in the development, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of sensitive species habitat, riparian habitat, a sensitive natural community, federally protected wetlands, or wildlife corridors or nursery sites. The HEU would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. As such, the HEU would have a less than significant impact on biological resources, and no mitigation is required.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

**No Impact.** The HEU would not have a substantial adverse effect on state or federally protected wetlands because there are no wetlands located within the City (City of Manhattan Beach 2003b). The HEU would not alter any local, regional, state, or Federal biological protection standards, nor would it alter the existing General Plan, LCP, or CCA policies related to protection and preservation of sensitive biological resources.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Although the policies and objectives of the HEU facilitate housing, any new housing would have to comply with all current biological preservation policies, standards, and regulations. The proposed HEU does not encourage housing or development to be located within wetlands, riparian areas, or any other type of sensitive habitat areas. Therefore, the HEU would have no impact on state or federally protected wetlands.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

#### Native Resident or Migratory fish

**No Impact.** The parcels identified in the HEU's sites analysis as having potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation do not support any waters of the United States, waters of the State, or wetlands under the jurisdiction of the Regional Water Quality Control Board, or any associated riparian habitat under the jurisdiction of CDFW (City of Manhattan Beach 2003b). As such, no impact to any migratory fish would occur.

#### Native Resident Wildlife Species

**Less Than Significant Impact.** The City is located within an urban and semi-urban area that is highly disturbed, contains numerous buildings, and, although partially located within the LCP boundary area, does not contain any major bodies of water or undisturbed open space areas that could contain or support habitat for native resident wildlife species. The City cannot be characterized as an undisturbed open space area which could potentially support native wildlife species. Thus, the HEU would have a less than significant impact on native resident wildlife species, and no mitigation is required.

#### Migratory Wildlife Species

**Less Than Significant Impact.** The City is located in an urban area that contains numerous buildings, which would likely discourage stops by substantial numbers of migrating birds. However, the City does contain trees and shrubs that may support nesting sites for migratory wildlife bird species during nesting season. Nesting activity typically occurs from February 15 to August 31 (January 15 to August 31 for raptors). Disturbing or destroying active nests is a violation of the MBTA. In addition, nests and eggs are



protected under Fish and Game Code Section 3503, and the removal of vegetation during the nesting season is considered a significant impact due to potential effects on active nests. Any future development facilitated by adoption of the HEU and requiring removal of trees or shrubs during nesting season, would be required to comply with the MBTA. Compliance would require that, prior to any vegetation removal activities during the nesting season, a biological monitor would conduct a preconstruction nesting bird survey. If nesting bird surveys are conducted prior to any ground-disturbing activities, and none are present, impacts to nesting birds are not expected.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of established native resident or migratory wildlife corridors or nurseries. And any future development would be required to comply with State and federal requirements related to migratory birds. As such, impacts would be less than significant, and no mitigation is required.

- e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

**Less Than Significant Impact.** Under the existing conditions, the areas identified in the HEU sites analysis as having potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocations consist of underutilized urban and semi-urban sites with paved surfaces and buildings surrounded by existing development. Landscaping in these areas consists primarily of discontinuous areas of ornamental groundcover, trees, and shrubs. Any tree removal required by future residential development facilitated by HEU programs would be required to comply with MBMC tree preservation policies, including Chapter 7.32, Tree, Shrub, and Plant Regulations, which establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way, as well as the City's Tree Ordinance (Section 10.52.120), which requires tree removal permits and replacement of protected tree species.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas and would not alter any local, regional, State, or Federal biological protection standards, nor would the HEU adoption alter the City's existing policies or ordinances protecting biological resources. Therefore, the HEU would not conflict with any local policies or ordinances protecting biological resources. Any impacts to biological resources would be less than significant, and no mitigation is required.

- f) ***Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

**No Impact.** The HEU involves the adoption of a policy document which would not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), natural community conservation plan, or other approved local, regional, or state HCP because there are no designated HCPs or natural community conservation plans within the City (CDFW 2021). As such, no impacts would occur.

### 3.4.4 References

California Department of Fish and Wildlife. 2021. Conservation Plan and Habitat Conservation Plan Boundaries. Updated September 2021. Accessed October 29, 2021. <https://apps.wildlife.ca.gov/bios/>

City of Manhattan Beach. 2003a. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.

City of Manhattan Beach. 2003b. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2014. City of Manhattan Beach Housing Element (2013-2021). Accessed October 29, 2021.

## 3.5 Cultural Resources

### 3.5.1 Environmental Setting

Manhattan Beach’s modern history began in 1888, when the first railroad spur (now Veterans Parkway) connected Redondo Beach Wharf to Downtown Los Angeles (City of Manhattan Beach 2003a, 2003b). The City’s most notable historic feature is the Manhattan Beach State Pier. The pier was originally constructed in 1901 and referred to as the “old iron pier.” The original pier was destroyed by a storm in 1913 and rebuilt in 1920. The 1920 pier was designed by City Engineer A.L. Harris. The roundhouse at the end of the pier was first constructed in 1922, which was considered a highly innovative design feature with helped mitigate wave and storm surge impacts (California State Parks 2021). However, seawater and annual storms damaged the pier severally in 1940 and again in 1980. The landmark was again reconstructed in 1956 and refurbished in 1990. It survives as Southern California’s oldest remaining example of early reinforced concrete pier construction, and as a California State Historical Monument (No. 1018, Manhattan Beach State Pier) (City of Manhattan Beach 2003a, 2003b).

Other prominent historical structures include several residential landmarks. Scott House, constructed in 1960 along the Strand, is an International style duplex currently listed under the California Register of Historical Resources (CRHR), while the residence located at 2820 Highland Avenue has been designated as a local historical landmark, in accordance with Chapter 10.86 of the Planning and Zoning Code. Other residential properties of historical interest include several cottages located in neighborhoods mainly in the western portion of the community, which were originally built as summer vacation homes in the early 1900s (City of Manhattan Beach 2003b, 2018), however, these cottages have not been recognized in any official capacity (Arroyo Resources 2018; City of Manhattan Beach 2019; OHP 2010).

## 3.5.2 Regulatory Setting

### Federal

#### National Register of Historic Places

The National Register of Historic Places (NRHP) is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act (NHPA) as amended. Its listings encompass all National Historic Landmarks and historic areas administered by the National Park Service.

The National Park Service's guidance for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. The criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. To be listed in or determined eligible for listing in the NRHP, a property must be demonstrated to possess integrity and to meet at least one of the following criteria (36 CFR, Section 60.4):

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and;

1. That are associated with events that have made a significant contribution to the broad patterns of our history; or
2. That are associated with the lives of persons significant in our past; or
3. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
4. That have yielded, or may be likely to yield, information important in prehistory or history.

"Integrity" is defined in the National Park Service's National Register Bulletin "How to Apply the National Register Criteria" as "the ability of a property to convey its significance." *Id.* at 44. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (NPS 1990). NRHP guidance further states that properties generally must be at least 50 years of age to be considered for eligibility. Properties completed less than 50 years before evaluation must be proven to be "exceptionally important" (criteria consideration G) to be considered for listing.

A historic property is defined as follows (36 CFR 800.16[i][1]):

Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria.

## Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior's Standards are a series of concepts focused on maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. They function as common-sense historic preservation principles that promote historic preservation best practices. There are four distinct approaches that may be applied to the treatment of historical resources:

- Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- Rehabilitation acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods.
- Reconstruction recreates vanished or non-surviving portions of a property for interpretive purposes.

The choice of treatment depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation. The Guidelines provide general design and technical recommendations to assist in applying the Standards to a specific property. Together, the Standards and Guidelines provide a framework that guides important decisions concerning proposed changes to a historic property.

## Secretary's Standards for Rehabilitation

The following 10 Standards for Rehabilitation are used to determine if a project is in conformance with the Standards for a rehabilitation. To be in conformance, a project must be consistent with the historic character of the structure(s) and, where applicable, the district in which it is located. The following Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

## State

### California Register of Historical Resources

In California, the term “historical resource” includes but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code, Section 5020.1[j]). In 1992, the California Legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California Public Resources Code, Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP and are enumerated below. According to California Public Resources Code, Section 5024.1(c)(1-4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are State landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

## California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- California Public Resources Code, Section 21083.2(g), defines “unique archaeological resource.”
- California Public Resources Code, Section 21084.1, and CEQA Guidelines, Section 15064.5(a), define “historical resources.” In addition, CEQA Guidelines, Section 15064.5(b), defines the phrase “substantial adverse change in the significance of an historical resource.” It also defines the circumstances when a project would materially impair the significance of a historical resource.
- California Public Resources Code, Section 21074(a), defines “tribal cultural resources.”
- California Public Resources Code, Section 5097.98, and CEQA Guidelines, Section 15064.5(e), set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- California Public Resources Code, Sections 21083.2(b) and (c), and CEQA Guidelines, Section 15126.4, provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

## Historical Resources

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code, Section 5024.1[q]), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5[b][1]; California Public Resources Code, Section 5020.1[q]). In turn, CEQA Guidelines, Section 15064.5(b)(2), states that the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g)

of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether the project would cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

### Relationship with the Secretary of the Interior's Standards for the Treatment of Historic Properties

Under the California Code of Regulations, where a project has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the project's impact on historical resources would be considered mitigated to below a level of significance and, thus, not significant (14 CCR 15126.4[b][1]). In most cases, a project that demonstrates conformance with the Secretary of the Interior's Standards is categorically exempt from CEQA (14 CCR 15331), as described in the CEQA Guidelines (14 CCR 15126.4[b][1]):

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Weeks and Grimmer 1995), the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.

As discussed above in Section 3.5.2, Regulatory Settings, the Secretary of the Interior's Standards are a series of concepts focused on maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. They function as common-sense historic preservation principles that promote historic preservation best practices. The Standards encourage historic resources be approached with the basic objectives of preservation, rehabilitation, restoration, or reconstruction. The choice of treatment depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation. The Guidelines provide general design and technical recommendations to assist in applying the Standards to a specific property. Together, the Standards and Guidelines provide a framework that guides important decisions concerning proposed changes to a historic property.

### Unique Archaeological Resources

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require that reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (California Public Resources Code, Sections 21083.2[a], [b], and [c]).

California Public Resources Code, Section 21083.2(g), defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (California Public Resources Code, Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as Tribal cultural resource (California Public Resources Code, Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required. CEQA Guidelines, Section 15064.5, assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in California Public Resources Code, Section 5097.98.

#### Section 7050.5 of the California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human grave. In the unlikely event that human graves are encountered, work should halt in the vicinity and the County Coroner should be notified immediately. At the same time, an archeologist should be contacted to evaluate the situation and grave. If the human remains are determined to be of Native American origin, the Coroner must contact the NAHC within 24 hours of identification.

### Local

#### City of Manhattan Beach General Plan

The following goal and policies within the City's General Plan are related to cultural resources:

Goal LU-4: Preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood's unique characteristics.

Policy LU-4.4: Encourage the preservation and enhancement of unique residential homes and buildings throughout Manhattan Beach to preserve the culture and history of the City.

Policy LU-4.5: Encourage measures that recognize and work to protect buildings, landscaping, and other features important to the City's history.

Policy LU-4.6: When public improvements are made, they should preserve and maintain distinctive neighborhood characteristics.

#### Manhattan Beach Municipal Code

##### **Chapter 10.86, Historic Preservation**

The purpose of the Chapter 10.86 (Historic Preservation Ordinance) is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of improvements, buildings, structures, objects, sites, and features that represent the City's architectural, cultural, social, historical, and political heritage. A main component of the ordinance is to preserve diverse and significant



architectural styles and property types, safeguard the City's heritage and small-town beach atmosphere by encouraging the identification, recognition, and protection of landmarks representing significant elements of the City's history and culture, and adopting incentives that promote the preservation and rehabilitation of historic properties. Regulations include establishing conservation districts, inventorying and establishing criteria for dedication of historic resources, maintaining a historic register, requiring certificates of appropriateness, and enforcing penalties for ordinance violations. As provided, in Section 10.86.070(D), sites in the City are eligible for dedication as historic landmarks and/or if they have yielded or have the potential to yield information important to the prehistory or history of the city, region, State, or nation.

### 3.5.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?***

**Less Than Significant Impact.** As discussed under Environmental Setting, the City's most notable a historic feature is the Manhattan Beach State Pier, which is designated as a California State Historical Monument (No. 1018, Manhattan Beach State Pier) (City of Manhattan Beach 2003a, 2003b). California State Historical Monuments are buildings, structures, sites, or places that have been determined to have statewide historical significance. The Manhattan Beach State Pier is also listed in the CRHR (see Section 3.5.2, Regulatory Settings). The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources.

The City's other notable historical structures include Scott House, an International style duplex, which is also listed in the CHRH. In addition, the residence located at 2820 Highland Avenue has recently been designated as a local historical landmark by the City, in accordance with Chapter 10.86 of the Planning and Zoning Code, which would require any adjacent projects acquire a Certificate of Appropriateness from the City in order to break ground on construction. Finally, the City 's historical resources include several coastal residential cottages, which were originally built as summer vacation homes in the early 1900s (City of Manhattan Beach 2003b, 2018, however, these cottages are not recognized or protected as historic resources in any official capacity (Arroyo Resources 2018; City of Manhattan Beach 2019; OHP 2010).

The City has long been committed to the maintenance and preservation of its residential neighborhood (City of Manhattan Beach 2014.). This commitment would not change as a result of adoption of the HEU. The City's General Plan, as well as the HEU, aims to preserve and maintain residential neighborhoods and to protect residential neighborhoods from the intrusion of incompatible and character-changing uses, including any protecting any structure, residential or otherwise, of noted historical or cultural significance. Preservation of the City's historic resources is further upheld via required conformance with Chapter 10.86, Historic Preservation, of the MBMC, which aims to safeguard the City's heritage and small-town beach atmosphere by encouraging the identification, recognition, and protection of landmarks representing significant elements of the City's history and culture.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would facilitate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. While new housing could be constructed on sites containing historic resources, the existing regulatory framework would ensure that all impacts to historic resources from future development are less than significant. The HEU would not change or alter policies to protect and/or review historic resources and would not cause a substantial adverse change in the significance of historical resources. Therefore, impacts would be less than significant, and no mitigation is required.

**b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

**Less Than Significant Impact.** According to Chapter 10.86, Historic Preservation, of the MBMC, "prehistory" refers to the period in history prior to the advent of written records, revealed through archaeological and paleontological discoveries and analysis. As provided, in Section 10.86.070(D), sites in the City are eligible for dedication as historic landmarks if they have yielded or have the potential to yield information important to the prehistory or history of the city, region, state, or nation.

In addition to local protections, and pursuant to the California Public Resources Code, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require that reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (California Public Resources Code, Sections 21083.2[a], [b], and [c]).

The City is virtually built out and does not contain any known archaeological or paleontological resources (City of Manhattan Beach 2003b). As such, the potential for uncovering significant resources during any construction activity is considered remote, given that no such resources have been discovered during past development and that all new development facilitated by the HEU would occur on previously developed sites (City of Manhattan Beach 2003b).

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would facilitate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. In the unlikely event that new housing accommodated by the HEU would ultimately be constructed on sites containing archeological resources, project level review as required under CEQA would ensure that all impacts to these resources are less than significant. The HEU

would not change or alter policies to protect and/or review archaeological resources and would not cause a substantial adverse change in the significance of archaeological resources. Therefore, impacts would be less than significant, and no mitigation is required.

c) ***Would the project disturb any human remains, including those interred outside of formal cemeteries?***

**Less Than Significant Impact.** Manhattan Beach is virtually built out, and the potential for uncovering significant cultural resources during any construction activity, including the discovery of human remains outside of formal cemeteries, is considered remote (City of Manhattan Beach 2003b). Therefore, it is not expected that human remains would be disturbed as a result of implementation of the HEU. However, the possibility of encountering human remains exists. In the unexpected event that human remains are unearthed during future construction activities facilitated by the HEU, impacts would be potentially significant. In the unlikely event that human remains are inadvertently encountered by future residential development accommodated by the adoption of the HEU, such resources would be treated in accordance with State and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). Project level review, as individual development projects are identified, as required under CEQA would ensure that all impacts to these human remains are less than significant. The HEU would not change or alter policies to protect and/or review historic resources. Therefore, the HEU would not disturb any human remains, impacts would be less than significant, and no mitigation is required.

### 3.5.4 References

- Arroyo Resources. 2018. Historic Resource Identification Form, Local Nomination, 2820 Highland Avenue, Manhattan Beach. [https://cms6ftp.visioninternet.com/manhattanbeach/commissions/planning\\_commission/2018/20180926/20180926-4.pdf](https://cms6ftp.visioninternet.com/manhattanbeach/commissions/planning_commission/2018/20180926/20180926-4.pdf). Accessed November 18, 2021.
- California State Parks. 2021. Office of Historic Preservation (Los Angeles County). Accessed October 30, 2021. [http://ohp.parks.ca.gov/?page\\_id=21427](http://ohp.parks.ca.gov/?page_id=21427)
- City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.
- City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/48342>.
- City of Manhattan Beach. 2014. City of Manhattan Beach Housing Element (2013-2021). [https://www.manhattanbeach.gov/home/showpublisheddocument/16921/635434710882970000?\\_ga=2.267205064.753363365.1629757800-251228080.1629141140](https://www.manhattanbeach.gov/home/showpublisheddocument/16921/635434710882970000?_ga=2.267205064.753363365.1629757800-251228080.1629141140). Accessed October 29, 2021.
- City of Manhattan Beach. 2018. City of Manhattan Beach Mobility Plan. Updated 2018. Accessed October 29, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/36671/636645874385670000>

City of Manhattan Beach. 2019. First Historic Landmark Application—2820 Highland Avenue. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/current-projects-programs/historic-preservation>. Accessed November 18, 2021.

NPS (National Park Service). 1990. National Register Bulletin: How to Apply the National Register Criteria for Evaluation. [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf). Accessed November 17, 2021.

OHP (California State Parks Office of Historic Preservation). 2010. State Historic Resources Commission 2009 Annual Report. <https://ohp.parks.ca.gov/pages/1067/files/2009%20annualreport.pdf>. Accessed November 18, 2021.

## 3.6 Energy

### 3.6.1 Environmental Setting

#### Electricity

According to the U.S. Energy Information Administration (EIA), California used approximately 25,379 gigawatt hours of electricity in 2019 (EIA 2020a). By sector in 2019, commercial uses utilized 46% of the State’s electricity, followed by 35% for residential uses, and 19% for industrial uses. Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building.

Clean Power Alliance (CPA) provides electricity to the City. CPA began operations in 2017, with the City joining in December 2017. CPA serves over three million people and provides 100% Green Energy more than any other electricity provider in the country. Thirty-two communities across Los Angeles and Ventura counties have opted for clean power through CPA. The City of Manhattan Beach homes and businesses transitioned to 100% renewable energy beginning October 2021 (City of Manhattan Beach 2021).

#### Natural Gas

According to the California Energy Commission (CEC), California used approximately 20,748 million therms<sup>11</sup> of natural gas in 2020 (EIA 2020b). The Southern California Gas Company (SoCalGas) provides the City with natural gas service. The territory serviced by SoCalGas encompasses approximately 20,000 square miles and more than 500 communities. In the California Energy Demand mid-energy demand scenario, natural gas demand is projected to have an annual growth rate of 0.03% in SoCalGas’s service territory. As of 2019, approximately 4.2 billion cubic feet per day were used in SoCalGas’s service area per year (California Gas and Electric Utilities 2020). This amount is approximately equivalent to 4.18 billion thousand British thermal units (kBtu) per day or 41.8 million therms per day. Over the course of a year, the available capacity would therefore be 9.1 billion therms per year, which is well above the existing and future anticipated natural gas demand in the area serviced by SoCalGas.

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<sup>11</sup> One therm is equal to 100,000 BTU or 100 kBtu.

## Petroleum

According to the CEC, California used approximately 27.8 billion gallons of petroleum in 2019 (EIA 2020c). This equates to a daily use of approximately 76 million gallons of petroleum. By sector, transportation uses utilize approximately 85.4% of the State's petroleum, followed by 10.9% from industrial, 2.6% from commercial, 1.0% from residential, and 0.01% from electric power uses (EIA 2020c). In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California's March 19, 2020, stay-at-home order resulted in an unprecedented drop in travel across all modes, with an accompanying drop in fuel demand. Demand for gasoline decreased 45% in April 2020 – the lowest demand level since 1968 (CEC 2020).

### 3.6.2 Regulatory Setting

#### Federal

##### Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

##### Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased corporate average fuel economy standards for motor vehicles, the EISA includes the following other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

This federal legislation (the RFS) requires ever-increasing levels of renewable fuels to replace petroleum (EPA 2017). The U.S. Environmental Protection Agency is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

#### State

##### SB 100

SB 100 (2018) increased the standards set forth in SB 350. The bill establishes that 44% of the total electricity sold per year to retail customers in California be secured from qualifying renewable energy sources by December 31, 2024, with that number increasing to 52% by December 31, 2027, and 60% by December 31, 2030. SB 100

states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

### California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies. The 2019 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2020. The 2019 Title 24 Building Energy Efficiency Standards would further reduce energy used and associated GHG emissions compared to prior standards. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards would use approximately 53% less energy than those under the 2016 standards (CEC 2018). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018).

### State Vehicle Standards

In response to the transportation sector accounting for more than half of California's carbon dioxide emissions, AB 1493 was enacted in 2002. Assembly Bill (AB) 1493 required CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined by the State board to be those whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emissions standards for motor vehicles manufactured in 2009 and all subsequent model years. The 2009 through 2012 standards resulted in a reduction in approximately 22% of GHG emissions compared to emissions from the 2002 fleet, and the 2013 through 2016 standards resulted in a reduction of approximately 30%.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global-warming gases with requirements for greater numbers of zero-emissions vehicles into a single package of standards called Advanced Clean Cars. By 2025, when the rules would be fully implemented, new automobiles would emit 34% fewer global-warming gases and 75% fewer smog-forming emissions (CARB 2011).

### Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet its GHG emissions reduction mandates. As codified in California Government Code Section 65080, SB 375 requires metropolitan planning organizations (e.g., Southern California Association of Governments) to include a Sustainable Communities Strategy in their regional transportation plan. The main focus of the Sustainable Communities Strategy is to plan for growth in a fashion that will ultimately reduce GHG emissions, but the strategy is also part of a bigger effort to address other development issues, including transit and vehicle miles traveled (VMT), which influence the consumption of petroleum-based fuels.

## Regional/Local

### City of Manhattan Beach General Plan

The following goals and policies related to energy are applicable to the HEU.

Goal CR-5: Conserve and protect the remaining natural resources in Manhattan Beach.

Policy CR-5.1: Employ principles of a sustainable environment in the development, operation, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.

Policy CR-5.3: Encourage water conservation, including landscaping with drought-tolerant plants, use of reclaimed water, and recycling of cooling system water, in all development.

Policy CR-5.5: Support expanded use of reclaimed water.

Policy CR-5.6: Encourage drainage designs which retain or detain stormwater run-off to minimize volume and pollutant concentrations.

Policy CR-5.7: Encourage the use of energy-saving designs and devices in all new construction and reconstruction.

Policy CR-5.8: Encourage utilization of “green” approaches to building design and construction, including use of environmentally friendly interior improvements.

Policy CR-5.10: Encourage and support the use of alternative fuel vehicles, including support of charging or “fueling” facilities.

Policy CR-5.11: Support sustainable building practices.

### 3.6.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact										
<ul style="list-style-type: none"> <li>▪ <b>VI. Energy</b> – Would the project:                             <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;">a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> </li> </ul>					a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>										
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>										

- a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

**Less Than Significant Impact.** Future development envisioned under the HEU would increase the demand for electricity, natural gas, and petroleum during both construction and operations. Energy use during construction associated with new development projects under the HEU is anticipated to be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment.

Construction activities associated with development under the HEU would be required to utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, individual projects would be required to comply with construction waste management practices to recycle 65% of construction and demolition debris per Chapter 5.26 of the City Code (City of Manhattan Beach 2017). Developers would be required to complete the Construction and Demolition Waste Management Plan and Construction Management and Parking Plan forms and use City-approved haulers to remove mixed construction debris.

Long-term operation of new development projects under the HEU would require electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. As previously discussed, given the already built-out nature of the City and lack of substantial vacant land, future residential projects that may be expected to be located on infill sites, which would be already served by energy providers. The HEU would also prioritize future development projects close to high quality transit areas and existing commercial/retail, recreational, and institutional land uses, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. This would help reduce new development projects consumption of petroleum.

New development projects under the HEU would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. CALGreen sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. Future projects built under the HEU would promote energy efficiency and renewable energy through



implementation of General Plan policies such as CR-5.1, CR-5.3, CR-5.7, CR-5.8, and CR-5.10 in addition to HEU Program 13, which encourages energy conservation and energy efficiency, as well as Program 27, which encourages the use of solar panels by providing incentives. These measures would require new construction to have buildings that meet and incorporate energy-saving designs and green building techniques, the promotion of electric vehicle infrastructure, and encourage the use of alternative energy sources such as from solar.

Based on the above information, the HEU would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy and would not be inconsistent with existing energy standards. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

**b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

**Less Than Significant Impact.** Private electrical and natural gas utility companies provide service to customers in the City of Manhattan Beach. Implementation of the HEU could result in new housing that addresses the City's 6<sup>th</sup> Cycle RHNA allocation and the City's policies supporting affordable and workforce housing. The rezoning of the opportunity sites would accommodate high density, infill, and mixed-use development located in an urbanized area. The power exists to these sites due to previous use and/or surrounding urban development. Furthermore, new development projects proposed under the HEU would comply with the most current Title 24 California Building Code/Code of Regulations (2019), CAL Green Code, California Green Building Standards Code, and 2019 energy standards at the time of building construction, as amended by the State of California. Projects would also be required comply with all current Title 24 energy requirements.

In addition to being subject to the aforementioned Statewide regulatory requirements, any future housing accommodated by the HEU would be subject to goals and policies provided in the City's General Plan, particularly Goal CR-5 and associated policies, which require that proposed projects conserve and protect the remaining natural resources of the City. This Goal facilitates the expanded use of renewable energy and efficiency, as required by Policies 5.3 and 5.5 (encouraging water conservation and increased reliance on reclaimed water), and Policies 5.7 and 5.8 (encouraging "green building" practices, and the use of energy saving designs and devices in all new construction and redevelopment). Further, Policy 5.10 (encouraging the use of alternative fuel vehicles including support of charging or "fueling" facilities), would contribute to any additional residents accommodate by the HEU decreasing their dependence of high energy fossil fuels.

During both construction and operation of the future projects would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended. During construction, all waste generated would be recycled to the maximum extent possible. Therefore, the HEU would not obstruct a State or local plan for renewable energy or energy efficiency and would result in less than significant impacts associated with energy.

### 3.6.4 References

- California Gas and Electric Utilities (Southern California Gas Company, Pacific Gas & Electric Company, San Diego Gas & Electric Company, Southwest Gas Corporation, City of Long Beach Gas & Oil Department, and Southern California Edison Company). 2020. *2020 California Gas Report*. 2020. Accessed October 28, 2021. [https://www.socalgas.com/sites/default/files/2020-10/2020\\_California\\_Gas\\_Report\\_Joint\\_Utility\\_Biennial\\_Comprehensive\\_Filing.pdf](https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf).
- CARB (California Air Resources Board). 2011. "Facts About the Advanced Clean Cars Program." Revised November 9, 2011. Accessed February 2019. [https://www.arb.ca.gov/msprog/zevprog/factsheets/advanced\\_clean\\_cars\\_eng.pdf](https://www.arb.ca.gov/msprog/zevprog/factsheets/advanced_clean_cars_eng.pdf).
- CEC (California Energy Commission). 2018. 2019 Building Energy Efficiency Standards – Frequently Asked Questions. March 2018. Accessed May 2019. [https://www.energy.ca.gov/sites/default/files/2020-03/Title\\_24\\_2019\\_Building\\_Standards\\_FAQ\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf).
- CEC. 2020. 2020 Integrated Energy Policy Report. CEC-100-2020-001-V1-CMF. March 23, 2021. Accessed October 2021. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update>.
- City of Manhattan Beach. 2017. City of Manhattan Beach Code of Ordinances, Chapter 5.26 Construction and Demolition Debris Waste Reduction and Recycling Requirements.
- City of Manhattan Beach. 2021. Press Release: Manhattan Beach Powered by 100Percent Green, Renewable Energy.
- EIA. 2020a. "State Electricity Profiles – California Electricity Profile 201p". November 2, 2020. Accessed October 2019. <https://www.eia.gov/electricity/state/california/index.php>.
- EIA. 2020b. "Natural Gas Consumption by End Use." Accessed October 2021. [https://www.eia.gov/dnav/ng/ng\\_cons\\_sum\\_a\\_EPGO\\_VCO\\_mmcf\\_a.htm](https://www.eia.gov/dnav/ng/ng_cons_sum_a_EPGO_VCO_mmcf_a.htm).
- EIA. 2020c. "California State Profile and Energy Estimates – Table F16: Total Petroleum Consumption Estimates, 2017." Accessed October 2021. [https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep\\_fuel/html/fuel\\_use\\_pa.html&sid=US&sid=CA](https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA).
- EPA. 2017. "Overview for Renewable Fuel Standard." Last updated June 7, 2017. Accessed February 2019. <https://www.epa.gov/renewable-fuel-standard-program/overview-renewable-fuel-standard>.

## 3.7 Geology and Soils

### 3.7.1 Environmental Setting

#### Topography

Topographically, the City consists of a variety of slopes and level surfaces. Elevations within the City range from sea level at the ocean to 240 feet in the southern neighborhoods. The land adjacent to the beaches slopes up, reflecting the sand dunes that used to encompass this area of the City and creating a shallow ridge, while the remaining properties have subtle slopes (City of Manhattan Beach 2003a).

#### Soils

Manhattan Beach lies within the Los Angeles Basin geological region (City of Manhattan Beach 2003a). Geologic formations underlying the city consist largely of nonmarine (inland) and marine (coastal) alluvial lake, playa, and terrace deposits, which are characterized by sandy and clay-like soils (CGS 2010, City of Manhattan Beach 2003a). These types of soils present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a).

#### Seismic Hazards

##### Active Faults

Areas with seismic (earthquake) hazards are identified by earthquake fault zones as established by the Alquist-Priolo Earthquake Fault Zone Act of 1972. The California Geological Survey (CGS; formerly the California Division of Mines and Geology [CDMG]) classifies faults as active, potentially active, or inactive according to standards developed for implementation of the Alquist-Priolo Earthquake Fault Zone Act. A fault that has exhibited surface displacement within the Holocene Epoch (the last 11,000 years) is defined as active. A fault that has exhibited surface displacement during Quaternary time (i.e., within the past 1.6 million years) but that cannot be proven to have moved or not moved during Holocene time is defined as potentially active. According to the City's General Plan (2003) there are no known active Alquist-Priolo Earthquake Fault Zones in the City, however, the City does lie directly above a known thrust fault,<sup>12</sup> and is less than 50-miles away from the San Andreas Fault, a 400-mile northwest-southeast running fault capable of producing earthquakes with a magnitude of 8 or greater on the Richter scale (City of Manhattan Beach 2003b). Numerous other fault lines have been identified in Southern California that could also have a significant impact on Manhattan Beach. These faults include Newport-Inglewood, Whittier, Chatsworth, Hollywood, Los Alamitos, and Palos Verdes (City of Manhattan Beach 2003b).

##### Surface Fault Ruptures

Surface rupture involves the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. Surface rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (earthquake hypocenter) is shallow. The Alquist-

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<sup>12</sup> The Compton Thrust Fault does not rupture all the way up to the surface; it is "buried" under the uppermost layers of rock in the earth's crust (City of Manhattan Beach 2003a) This type of fault is not recognized on the Seismic Hazard Zone Map as a fault hazard zone (CDOC 2021).

Priolo Earthquake Fault Zoning Act of 1972 (the Act) regulates development near Holocene-active faults to address the hazard of surface fault rupture. This Act requires the State Geologist to establish regulatory zones (known as Alquist-Priolo Special Study Fault Zones) around the surface traces of Holocene-active faults and to issue appropriate maps (CGS 2018). The City is not located within an Alquist-Priolo Earthquake Fault Zone (City of Manhattan Beach 2003a, 2003b, CGS 2021). As such, the potential for surface rupture due to fault displacement beneath the City is considered very low (City of Manhattan Beach 2003b).

### Groundshaking

Groundshaking (or seismic shaking) caused by fault movement during an earthquake has the potential to result in the damage or destruction of buildings, infrastructure, and possible injury or loss of life. Groundshaking may occur as a result of movement along a fault located within the city or along a more distant fault. The intensity of groundshaking in a particular area is dependent on several factors, including the earthquake magnitude, the distance from the epicenter, the duration of strong ground motion, local geologic conditions, and the fundamental period of the structure. Groundshaking can also trigger secondary seismic phenomena, such as liquefaction, lateral spreading, seismically induced settlement and slope instability, tsunami and seiche, and other forms of ground rupture and seismic responses. Manhattan Beach is subject to ground shaking in the event of a major seismic event, as is most of Southern California (City of Manhattan Beach 2003a).

### Liquefaction

Liquefaction is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking. Soils transform from a solid to a liquid state as a result of rapid loss of shear strength and increased pore water pressure induced by earthquake vibrations. According to the Seismic Hazard Zones Map, Venice Quadrangle, an area where liquefaction has occurred, or conditions indicate a potential occurrence within Manhattan Beach is limited to a strip of coastal sands along the ocean (City of Manhattan Beach 2003a). None of the existing or potential parcels identified as having the capacity to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation are located on a liquefaction hazard zone (CDOC 2021).

### Landslide Hazards

Landslides are fast, downward movement of earth and rock materials. Some landslides are caused by the infiltration of water into unstable material. Other landslides are earthquake-induced landslides consisting of rock falls and debris flow. Areas with the potential for earthquake-induced landslides generally occur in areas of previous landslide movement, or where topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacement. Manhattan Beach lies within the Los Angeles Basin geological region and is underlain with deposits characterized by sand and clay-like soils. These soil types present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a). The Seismic Hazard Zones Map, Venice Quadrangle, identifies a small portion of land in the northwest corner of the city that experienced previous landslide movement or local conditions indicate a potential ground displacement occurrence. (City of Manhattan Beach 2003a), however, the areas identified in the sites analysis as having the potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation are not underlain by a landslide hazard zone (CDOC 2021).

## 3.7.2 Regulatory Setting

### Federal

#### Earthquake Hazards Reduction Act

In October 1977, the U.S. Congress passed the Earthquake Hazards Reduction Act to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this goal, the act established the National Earthquake Hazards Reduction Program. This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act, which refined the description of agency responsibilities, program goals, and objectives.

The mission of the National Earthquake Hazards Reduction Program includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improved building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improved mitigation capacity; and accelerated application of research results. The National Earthquake Hazards Reduction Program Act designates the Federal Emergency Management Agency as the lead agency of the program and assigns several planning, coordinating, and reporting responsibilities. Other National Earthquake Hazards Reduction Program Act agencies include the National Institute of Standards and Technology, National Science Foundation, and the U.S. Geological Survey.

### State

#### Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Act (California Public Resources Code [PRC] Sections 2621–2630) was passed in 1972 to mitigate the hazard of surface faulting to structures designed for human occupancy. The main purpose of the law is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. The Alquist-Priolo Act requires the State Geologist to establish regulatory zones known as Earthquake Fault Zones around the surface traces of active faults and to issue appropriate maps. The maps are distributed to all affected cities, counties, and state agencies for their use in planning efforts. Before a project can be permitted in a designated Alquist-Priolo Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults.

The Alquist-Priolo Act also requires the State Geologist to compile maps delineating earthquake fault zones and to submit maps to all affected cities, counties and state agencies for review and comment. As referenced in Threshold a(i) of Section 3.1.3, Environmental Impacts, Special Publication 42 has been the vehicle by which the State Geologist, through the California Geological Survey (previously the Division of Mines and Geology), has informed affected agencies. The objectives of Special Publication 42 include:

1. To promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Alquist-Priolo Earthquake Fault Zoning Act.
2. To assist affected parties in the evaluation and mitigation of surface fault rupture hazard for projects within designated Earthquake Fault Zone

Maps utilized in this ND to determine earthquake fault and liquefaction zones are digitized and georeferenced versions of the maps provided in Special Publication 42 (Revised 2018).

### Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC Sections 2690–2699.6) addresses earthquake hazards from non-surface fault rupture, including liquefaction and seismically induced landslides. The act established a mapping program for areas that have the potential for liquefaction, landslide, strong ground shaking, or other earthquake and geologic hazards. The act also specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils.

### National Pollutant Discharge Elimination System Permit

In California, the State Water Resources Control Board administers regulations promulgated by the U.S. Environmental Protection Agency (55 Code of Federal Regulations [CFR] 47990), requiring the permitting of stormwater-generated pollution under the National Pollutant Discharge Elimination System (NPDES). In turn, the State Water Resources Control Board's jurisdiction is administered through nine Regional Water Quality Control Boards. Under these federal regulations, an operator must obtain a General Construction Permit through the NPDES Stormwater Program for all construction activities with ground disturbance of one acre or more. The General Construction Permit requires the implementation of best management practices (BMPs) to reduce sedimentation into surface waters and to control erosion. One element of compliance with the NPDES permit is preparation of a Stormwater Pollution Prevention Plan (SWPPP) that addresses control of water pollution, including sediment, in runoff during construction. The Manhattan Beach Public Works Department enforces NPDES requirements, which are adopted as part of the MBMC.

### California Building Standards Code

The California Building Code (CBC) has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or those standards are not enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability, by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. As indicated previously, the CBC is updated and revised every 3 years. The 2019 version of the CBC became effective January 1, 2020. It is anticipated that the HEU would use the most current CBC at the time of building permit issuance. The 2019 edition of the CBC is based on the 2018 International Building Code, published by the International Code Conference.

Chapters 16 and 16A of the 2019 CBC include structural design requirements governing seismically resistant construction, including factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Chapters 18 and 18A include the requirements for foundation and geotechnical soil investigations, and geohazard reports (Section 1803A); excavation, grading, and fill (Section 1804A); damp-proofing and water-proofing (Section 1805A); allowable load-bearing values of soils (Section 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Section 1807A); foundations (Section 1808A); and design of shallow foundations (Section 1809A) and deep foundations (Section 1810A). Chapter 33 of the 2019 CBC includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304).

Construction activities are subject to occupational safety standards for excavation and trenching, as specified in the California Safety and Health Administration regulations (CCR Title 8) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. Any future development accommodated as a result of approval and implementation of the HEU would be required to employ these safety measures during excavation and trenching.

## **California Environmental Quality Act**

### Paleontological Resources

The CEQA Guidelines require that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to paleontological resources. Paleontological resources, which are limited, nonrenewable resources of scientific, cultural, and educational value, are recognized as part of the environment under these state guidelines. This study satisfies project requirements in accordance with CEQA (13 PRC, 2100 et seq.) and Public Resources Code Section 5097.5 (Stats 1965, c 1136, p. 2792). This analysis also complies with guidelines and significance criteria specified by the Society for Vertebrate Paleontology (SVP 2010).

Paleontological resources are explicitly afforded protection by CEQA, specifically in Section VII(f) of CEQA Guidelines Appendix G, the “Environmental Checklist Form,” which addresses the potential for adverse impacts to “unique paleontological resource[s] or site[s] or ... unique geological feature[s].” This provision covers fossils of signal importance – remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group – as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth. Further, CEQA provides that generally, a resource shall be considered “historically significant” if it has yielded or may be likely to yield information important in prehistory (PRC 15064.5 [a][3][D]). Paleontological resources would fall within this category. The PRC, Chapter 1.7, sections 5097.5 and 30244 also regulates removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

## **Regional and Local**

### City of Manhattan Beach General Plan

The Community Safety Element of the General Plan recognizes that seismic and geologic hazards present a variety of risks to the residents of the City. Goals and policies applicable to geology and soils include:

Goal CS-1: Minimize the risks to public health, safety, and welfare resulting from natural and human caused hazards.

Policy CS-1.4: Minimize the potential damage to structures and loss of life that may result from an earthquake.

Policy CS-1.5: Require that new developments minimize stormwater and urban runoff into drainage facilities by incorporating design features such as detention basins, on-site water features, or other strategies”

Policy CS-1.8: Participate in Federal, State, and local earthquake preparedness and emergency response programs.

Goal CS-3: Maintain a high level of City emergency response services

Policy CS-3.1: Support the continued active enforcement of the building and fire code.

Policy CS-3.3: Inform all residents of the requirements for visible and clearly legible street numbers to minimize the response time of emergency personnel.

Policy CS-3.4 Ensure that street signs are legible and easy to find by both emergency response personnel and the general public.

Policy CS-3.5: Review the City's emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.6: Review the location, size, and equipment at each designated emergency shelter periodically to ensure that the City will be able to accommodate all people likely to need shelter in the event of a disaster.

Policy CS-3.7: Support the use of the best available equipment and facilities to ensure safety that meets the changing needs of the community.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Policy CS-3.10: Strive to reduce emergency response time

## Manhattan Beach Municipal Code

### Section 5.36.130, Connection to sewers where provided mandatory

In accordance with Section 5.36.130, any development proposed in the vicinity of the public sewer system is prohibited from constructing, maintaining, or using a cesspool, septic tank, or any other means of disposal of sewage on any premises in the City. At this time, public sanitary sewer connections would be available and required for any development accommodated as a result of HEU implementation.

## Title 9, Building Regulations

### Chapter 9.01, Building Code

The Building Code for the City includes Section 9.01.010, Adoption of the 2019 California Building Code (CBC), which incorporates by reference the rules, regulations, provisions, and conditions set forth in the 2019 CBC, including the Appendices F, J, and O and Standards (including Chapter/Section 1, Division 2; Chapter 31B and excluding all other Appendices). The California Building Code, together with provisions set forth in Chapter 9.01 of the MBMC would apply to the construction, alteration, improvements, enlargement, replacement, demolition, or conversion of any buildings or structures in the within the City.



Section 9.01.110, General Structural Design Provisions, of this chapter requires minimum standards for structural seismic resistance established primarily to reduce the risk of life loss or injury. This section also requires site-specific stability studies for hillside development.

#### Chapter 9.03, Residential Code

The Residential Code for the City includes Section 9.03.010, Adoption of California Residential Code (CRC), which incorporates by reference the rules, regulations, provisions, and conditions set forth in the 2019 CRC, including Chapter 1, Division 2 and Appendices J, K, Q, T, and V.

### Title 10, Planning and Zoning

#### Section 10.80.010 – Building, grading, and demolition permits

In accordance with Section 10.80.101, no building, grading, or demolition permit would be issued to any HEU unless the City's Director of Community Development determined that each new or expanded use or structure complied with all of the requirements set forth in the MBMC, including, by reference, provisions and requirements of both the CBC and CRC.

### Title 11, Subdivisions

Title 11 regulates and controls the design and improvement of subdivisions, including residential subdivisions, and ensures consistency with the City's General Plan.

#### Section 11.20.120, Soils/geology report.

The requirements set forth by Section 11.20.120 of Title 11 are as follows:

- A. The applicant shall submit a preliminary soils and/or geology report, prepared by a civil engineer and/or geologist, registered in the State, based upon adequate test borings, for every subdivision for which a final map is required. The preliminary soils and/or geology report shall be submitted to the City Engineer for review. The City Engineer may require additional information or reject the report if it is found to be incomplete, inaccurate or unsatisfactory. The preliminary soils and/or geology report may be waived if the City Engineer finds that sufficient knowledge exists as to the soils qualities of the soils of the subdivision.
- B. In the event the preliminary soils report indicates the presence of critically expansive soils, or other soils problems which, if not corrected, could lead to structural defects, a soils investigation of each lot or parcel in the subdivision shall be required and must be performed by a civil engineer registered in the State who shall recommend the corrective action which is likely to prevent structural damage to each structure proposed to be constructed in the area where such soils problem exists.
- C. In the event the preliminary soils report indicates the presence of rocks or liquids containing deleterious chemicals which, if not corrected, could cause construction materials such as concrete, steel, and ductile or cast iron to corrode or deteriorate, a soils investigation of each potentially affected lot or parcel in the subdivision shall be required and must be performed by a civil engineer registered in the State who shall recommend the corrective action which is likely to prevent structural damage to each structure proposed to be constructed in the area where such soils problem exists.

- D. The subdivision or any portion thereof where such soils problems exist may be approved if it is determined that the recommended action is likely to prevent structural damage to each structure to be constructed and that the issuance of any building permit shall be conditioned to include this recommended action in connection with the construction of each structure involved.
- E. A note shall be placed on the final map stating that a geology and/or soils report has been prepared in conjunction with the subdivision or stating that the geological and/or soils report has been waived pursuant to subsection A of this section. This section requires submission of a preliminary soils and/or geology report, prepared by a civil engineer and/or geologist, registered in the state, based upon adequate test borings, for every subdivision for which a final map is required. This requirement is set forth in order to prevent structural damage to any proposed occupied structure(s) due to seismic activities, including ground shaking, landslides, and/or liquefaction.

### 3.7.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS – Would the project:</b>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less Than Significant Impact.** The City is not located within an Alquist-Priolo Earthquake Fault Zone (City of Manhattan Beach 2003a, 2003b. CGS 2010); however, the City does lie directly above a known thrust fault and is less than 50-miles away from the San Andreas Fault. As the thrust fault is buried under the uppermost layers of rocks in the earth’s crust, the potential to directly or indirectly cause or exacerbate existing fault rupture risks within the City is considered very low (City of Manhattan Beach 2003b). Continued compliance with existing building codes and standards, including the MBMC requirement for proposed development projects to prepare a geotechnical report and/or soils investigation (Section 11.20.120), would be required. Therefore, the HEU would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City’s 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas and would not alter any local, regional, State, or Federal geological protection standards, nor would the HEU alter the City’s existing policies or ordinances protecting or establishing building code standards or seismic safety requirements. The HEU does not directly or indirectly the risk of loss, injury or death due to the rupture of a known earthquake fault. Therefore, impacts would be less than significant, and no mitigation is required.

ii) ***Strong seismic ground shaking?***

**Less Than Significant Impact.** Manhattan Beach is subject to ground shaking in the event of a seismic event, as is most of Southern California. However, continued compliance with Community Safety Element policies, as well as existing building codes and standards, including those outlined in the CBC and MBMC, would ensure that impacts from ground shaking will be minimized (City of Manhattan Beach 2003a). Therefore, the HEU would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas and would not alter any local, regional, State, or Federal geological protection standards, nor would the HEU alter the City's existing policies or ordinances protecting or establishing building code standards or seismic safety requirements. The HEU does not directly or indirectly the risk of loss, injury or death due to the ground shaking. Therefore, impacts would be less than significant, and no mitigation is required.

iii) ***Seismic-related ground failure, including liquefaction?***

**Less Than Significant Impact.** According to the Seismic Hazard Zones Map, Venice Quadrangle, an area where liquefaction has occurred or conditions indicate a potential occurrence within the City is limited to a strip of coastal sands along the ocean, where no habitable structures are permitted (City of Manhattan Beach 2003a). As such, the HEU does not directly or indirectly result in loss, injury or death due to seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant, and no mitigation is required.

iv) ***Landslides?***

**Less Than Significant Impact.** The soils underlying the City present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a). While there are a few scattered pockets of landslide prone areas within the City (CGS 2010), none underlie any sites identified in the HEU as being appropriate to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation, therefore future development would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

b) ***Would the project result in substantial soil erosion or the loss of topsoil?***

**Less Than Significant Impact.** The HEU does not propose specific development plans for new residential dwelling units at this time. Therefore, components associated with future development efforts resulting from the additional capacity accommodated for by the HEU—such as amount of grading, excavation, vegetation removal, etc.—are currently unknown. If a future project proposes to disturb more than one acre of soils, it is required to prepare a SWPPP, which includes BMPs for erosion and sedimentation control. BMP examples

generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, gravel bags, etc. Existing vegetation should be preserved as much as possible. Future development of units that is facilitated by adoption of the HEU would be subject to these conditions for a construction permit, even under conditions of streamlined development.

- c) ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

**Less Than Significant Impact.** Manhattan Beach lies within the Los Angeles Basin geological region (City of Manhattan Beach 2003a). Geologic formations underlying the City consist largely of alluvial deposits, which are characterized by sandy and clay-like soils (CGS 2010, City of Manhattan Beach 2003a). These types of soils present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a). The City is not underlain by a known liquefaction or landslide hazards zone (CDOC 2021). The HEU would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the HEU and would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Therefore, impacts due to unstable geological units or soils would be less than significant, and no mitigation is required.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

**Less Than Significant Impact.** For all future development accommodated as a result of implementation of the HEU, existing Municipal and Building Code requirements would be applied to regulate building quality and structural integrity. In addition, the soils underlying the City have low to very low expansion potential (UC Davis 2012, USDA 2021). As such, there would not be a substantial direct or indirect risk to life or property related to the shrinking and swelling of soils supporting buildings, roads, and other infrastructure.

Implementation of the programs contained in the document would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Although implementation of the programs contained in the HEU would facilitate residential development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, any proposed land use changes would follow the adoption of the proposed HEU and would be subject to future environmental review, as required under CEQA once sufficient information is made available. All future projects would be required to adhere to relevant development standards and design guidelines contained in the Planning and Zoning Ordinance and other applicable regulatory requirements governing the nature and quality of development within the City. Therefore, impacts from expansive soils would be less than significant, and no mitigation is required.

- e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

**No Impact.** In accordance with Section 5.36.130, any development proposed in the vicinity of the public sewer system is prohibited from constructing, maintaining, or using a cesspool, septic tank, or any other means of disposal of sewage on any premises in the City. At this time, public sanitary sewer connections would be available and required for any development accommodated as a result of HEU implementation. As such, no septic tanks would be permitted, and no impacts would occur.

f) ***Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

**Less Than Significant Impact.** The City is virtually built out and does not contain any known paleontological resources (City of Manhattan Beach 2003b). As such, the potential for uncovering significant resources during any construction activity is considered remote, given that no such resources have been discovered during past development and that all new development facilitated by the HEU would occur on previously developed sites. As such, the HEU would result in less than significant impacts associated with unique paleontological or geological resources, and no mitigation is required.

### 3.7.4 References

- CGS (California Geological Survey). 2010. Geologic Map of California. Accessed October 29, 2021. [https://ngmdb.usgs.gov/ngm-bin/pdp/zui\\_viewer.pl?id=28737](https://ngmdb.usgs.gov/ngm-bin/pdp/zui_viewer.pl?id=28737).
- CGS. 2018. Earthquake Fault Zones, A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California. Revised 2018. Accessed October 27, 2021. [https://www.conservation.ca.gov/cgs/Documents/SP\\_042.pdf](https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf).
- CDOC (California Department of Conservation). 2021. Earthquake Hazards Zone Application. Accessed October 30, 2021. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.
- California State Parks. 2021. Office of Historic Preservation (Los Angeles County). Accessed October 30, 2021. [http://ohp.parks.ca.gov/?page\\_id=21427](http://ohp.parks.ca.gov/?page_id=21427)
- City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.
- City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.
- USDA (United States Department of Agriculture). 2021. Web Soil Survey. Area of Interest CA696. Accessed October 2, 2021. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.
- UC Davis (University of California, Davis). 2021. Linear Extensibility Percent. Accessed October 2, 2021. <https://casoilresource.lawr.ucdavis.edu/gmap/help/defn-linear-extensibility.html>.

## 3.8 Greenhouse Gas Emissions

### 3.8.1 Environmental Setting

Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere

near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5).

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare each GHG's ability to trap heat in the atmosphere relative to another gas. The reference gas used is CO<sub>2</sub>; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO<sub>2</sub> equivalent (CO<sub>2</sub>e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH<sub>4</sub> is 25 (i.e., emissions of 1 MT of CH<sub>4</sub> are equivalent to emissions of 25 MT of CO<sub>2</sub>), and the GWP for N<sub>2</sub>O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

## 3.8.2 Regulatory Setting

### Federal

#### Clean Air Act

There is currently no federal overarching law specifically related to climate change or reductions in GHG emissions. However, under the Obama administration, the EPA had been developing regulations under the Clean Air Act that seek to reduce GHG emissions. The regulations cover GHG emissions from sources such as motor vehicles, transportation fuels, new and existing power plants, the oil and gas sector, and municipal landfills. EPA also adopted a Mandatory Reporting Rule and Clean Power Plan in August 2015. Under the Clean Power Plan, EPA issued regulations to control CO<sub>2</sub> emissions from new and existing coal-fired power plants. Previously, in May 2010, EPA set GHG emission thresholds to define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. As discussed below, the EPA and the National Highway Traffic Safety Administration (NHTSA) work in coordination to enable the production of clean vehicles through GHG emission reductions and improved fuel use.

#### Federal Vehicle Standards

The EPA and National Highway Traffic Safety Administration (NHTSA) announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016 (April 2010) that is intended to reduce GHG emissions and improve fuel economy. The EPA approved the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA approved Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act (75 FR 25324–25728), which became effective on July 6, 2010 (75 FR 25324–25728). In August 2018, EPA and NHTSA proposed to amend certain fuel economy and

GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. The 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2–3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of 1 °C by 2100 (EPA and NHTSA 2018).

On September 27, 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (84 FR 51310), which became effective November 26, 2019. The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the EPA and NHTSA issued the Part Two Rule, which sets CO<sub>2</sub> emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026. On January 20, 2021, President Joe Biden issued an EO on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, which includes review of Part One Rule by April 2021 and review of the Part Two Rule by July 2021 (The White House 2021).

## State

### EO S-3-05

EO S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80% below 1990 levels by 2050.

### AB 32

In furtherance of the goals established in EO S-3-05, the Legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California’s GHG emissions at 1990 levels by 2020, and initiate the transformations required to achieve the state’s long-range climate objectives.

One specific requirement of AB 32 is for CARB to prepare a “scoping plan” for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code Section 38561(a)), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan: *The Climate Change Proposed Scoping Plan: A Framework for Change* (Scoping Plan).

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update (Second Update)* (CARB 2017). The Scoping Plan recommends strategies for implementation at the Statewide level to meet the goals of AB 32, SB 32, and the EOs; it also establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. A project is considered consistent with the statutes and EOs if it meets the general policies in reducing GHG emissions in order to facilitate the achievement of the State’s goals and does not impede attainment of those goals. As discussed in several cases, a given project need not be in perfect conformity with each and every planning policy or goal to be consistent. A project would be consistent if it will further the objectives and not obstruct their attainment.

### SB 32 and AB 197

SB 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three



members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the State's climate policies. AB 197 also added two members of the Legislature to the CARB Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

#### Title 24, Part 6

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25406[b][1]). The 2019 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2020. The 2019 Title 24 Building Energy Efficiency Standards further reduce energy used and associated GHG emissions compared to prior standards.

#### Title 24, Part 11

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as California's Green Building Standards (CALGreen) and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals.

#### State Vehicle Standards (AB 1493 and EO B-16-12)

AB 1493 (July 2002) was enacted in a response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. It ordered CARB, CEC, California Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050.

## Advanced Clean Cars Program and Zero-Emissions Vehicle Program

The Advanced Clean Cars Program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025, cars will emit 75% less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the EPA and the NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The Zero-Emissions Vehicle Program will act as the focused technology of the Advanced Clean Cars Program by requiring manufacturers to produce increasing numbers of zero-emissions vehicles and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

## Regional/Local

### South Coast Air Quality Management District

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008). The SCAQMD has recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects; however, these thresholds were not adopted.

### City of Manhattan Beach General Plan

The following goals and policies related to GHG emissions are applicable to the HEU.

Goal I-12: Protect the quality of the environment by managing the solid waste generated in the community.

Policy CR-12.3: Encourage the maximum diversion of construction and demolition materials.

Goal CR-5: Conserve and protect the remaining natural resources in Manhattan Beach.

Policy CR-5.1: Employ principles of a sustainable environment in the development, operation, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.

Policy CR-5.3: Encourage water conservation, including landscaping with drought-tolerant plants, use of reclaimed water, and recycling of cooling system water, in all development.

Policy CR-5.5: Support expanded use of reclaimed water.

Policy CR-5.6: Encourage drainage designs which retain or detain stormwater run-off to minimize volume and pollutant concentrations.

Policy CR-5.7: Encourage the use of energy-saving designs and devices in all new construction and reconstruction.

Policy CR-5.8: Encourage utilization of “green” approaches to building design and construction, including use of environmentally friendly interior improvements.

Policy CR-5.10: Encourage and support the use of alternative fuel vehicles, including support of charging or “fueling” facilities.

Policy CR-5.11: Support sustainable building practices.

Goal CR-6: Improve air quality.

Policy CR-6.1: Encourage alternative modes of transportation, such as walking, biking, and public transportation, to reduce emissions associated with automobile use.

Policy CR-6.4: Cooperate and participate in regional air quality management planning, programs, and enforcement measures.

### Climate Action Plan

The City of Manhattan Beach and the South Bay Cities Council of Governments published the City of Manhattan Beach Climate Action Plan (CAP) in 2017, which established goals and policies that incorporate GHG reduction measures into community and municipal operations. The CAP included 2005 and 2012 inventories of community and municipal GHG emissions and set GHG reduction targets of 15% below 2005 levels by 2020 and 49% below 2005 levels by 2035. The CAP contains goals and measures that cover sectors such as land use and transportation, energy efficiency, solid waste, urban greening, and energy generation and storage (City of Manhattan Beach 2017). However, the CAP did not undergo CEQA review and was not adopted in a public process and is created to help develop a Qualified Climate Reduction Strategy under CEQA. Therefore, the CAP is not a qualified GHG reduction plan as defined in CEQA Guidelines Section 15183.5. Additionally, the City is in the process of creating a Climate Action and Adaptation Plan, which will build on the existing CAP.

### 3.8.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS</b> – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

**Less Than Significant Impact.** The HEU is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce greenhouse gas emissions. Implementation of the programs contained in the document would accommodate development required to meet the City’s 6<sup>th</sup> Cycle RHNA allocation. Future development of residential dwelling units under the HEU could result in an increase in GHG emissions during construction which are primarily associated with use of off-road construction equipment, vendor trucks, and worker vehicles, and operational activities, which includes motor vehicle trips, landscape maintenance equipment operation, energy use (natural gas and generation of electricity consumed by a proposed development project), solid waste disposal, and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. However, future development must be consistent with the General Plan and with regional plans that are based on the land use pattern of the General Plan.

Furthermore, future development as a result of the HEU would occur in developed areas of the City where public services and infrastructure are currently provided. Existing regulations that would apply to any future residential development, including the California Green Building Standards Code and California’s Title 24 Building Energy Efficiency Standards, would substantially reduce GHG emissions associated with future projects. Given the already built-out nature of the City and lack of substantial vacant land, future residential projects that may be developed to meet the RHNA requirement are expected to be located on infill sites where pedestrian- and transit-oriented development is highly feasible and would be encouraged. Such development should reduce the number of new vehicle trips typically associated with residential projects and, thus, would help reduce GHG production resulting from the combustion of fossil fuels for transportation purposes. Because specific project details are not known at this time, the City cannot assess the specific impacts of development in qualitative terms. Any impacts identified for an individual project built under the HEU would be addressed through the project approval process, including design review, environmental review, and mitigation measures specific to any impacts determined to be potential for that project.

Goals and policies from the General Plan Community Resources Element, as presented above, are designed to help reduce GHG emissions in a wide range of actions. As stated earlier the City is also working on the development of a Climate Action and Adaptation Plan that will contain actionable programs to help with GHG reductions in a variety of sectors. Development under the HEU will also have electricity provided by CPA, which would provide 100% renewable energy to all residents within the City, thus reducing GHG emissions. The Housing Element Update also includes policies that would help reduce future projects

energy consumption such as Program 13, which encourages energy conservation and energy efficiency, as well as Program 27, which encourages the use of solar panels by providing incentives. These measures would require new construction to have buildings that meet incorporate energy-saving designs and green building techniques, the promotion of electric vehicle infrastructure, and encourage the use of alternative energy sources such as from solar.

Based on the above information, the HEU would result in less than significant impacts associated with GHG emissions. No mitigation required.

b) ***Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

**Less Than Significant Impact.** The HEU does not propose specific development plans for new residential dwelling units at this time. As previously discussed, future development built under the HEU would likely generate GHG emissions during construction through the use of petroleum-fueled construction equipment and worker vehicle trips to and from construction sites while the operation of future developments would likely generate GHG emissions through the use of electricity and natural gas, vehicle trips of occupants, waste generation, water use, and wastewater generation. In addition, project components (e.g., VMT) for future residential dwelling units is unknown. However, impacts to GHG emissions related to the accommodation of an additional 479 dwelling units would largely be addressed via required discretionary CEQA review of the pending rezoning effort(s), which would incorporate mitigation measures specific to any impacts determined to be significant. Future development of residential units that is facilitated by adoption of the HEU would be subject to all State and local regulations (e.g., Climate Action and Adaptation Plan) regarding GHG emissions. Therefore, the HEU is consistent with applicable plans, policies, or regulations aimed at reducing such GHG emissions, any impacts would be less than significant, and no mitigation is required.

### 3.8.4 References

- CAPCOA (California Air Pollution Control Officers Association). 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008.
- CARB. 2012. California Air Resources Board Approves Advanced Clean Car Rules. January 27. <https://www.arb.ca.gov/newsrel/newsrelease.php?id=282>.
- CARB. 2017. The 2017 Climate Change Scoping Plan Update. January 20. Accessed January 2017. [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf).
- CEC (California Energy Commission). 2018. *2019 Building Energy Efficiency Standards*. Accessed November 2019. [https://www.energy.ca.gov/sites/default/files/2020-03/Title\\_24\\_2019\\_Building\\_Standards\\_FAQ\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf).
- City of Manhattan Beach. 2017. Climate Action Plan. Accessed October 2021.

EPA. 2017. *Carbon Pollution Standards for Cars and Light Trucks to Remain Unchanged Through 2025*. January 13, 2017. <https://www.epa.gov/newsreleases/carbon-pollution-standards-cars-and-light-trucks-remain-unchanged-through-2025>.

EPA and NHTSA (U.S. Environmental Protection Agency and Department of Transportation's National Highway Traffic Safety Administration). 2016. EPA and NHTSA Adopt Standards to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond. August 2016. <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P7NL.PDF?Dockey=P100P7NL.PDF>.

EPA and NHTSA. 2018. The Safer Affordable Fuel-Efficient 'SAFE' Vehicles Rule for Model Years 2021-2026 Passenger Vehicles and Light Trucks. Proposed Rule August 2018. Accessed May 2019. <https://www.govinfo.gov/content/pkg/FR-2018-08-24/pdf/2018-16820.pdf>.

IPCC (Intergovernmental Panel on Climate Change). 2007. *IPCC Fourth Assessment Synthesis of Scientific-Technical Information Relevant to Interpreting Article 2 of the U.N. Framework Convention on Climate Change*.

The White House. 2021. Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. January 20. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-public-health-and-environment-and-restoring-science-to-tackle-climate-crisis/>

## 3.9 Hazards and Hazardous Materials

### 3.9.1 Environmental Setting

As defined in Chapter 6.95 of Division 20 of the California Health and Safety Code, Section 25501(o), a hazardous material is “...any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.”

California Government Code Section 65962.5 requires the California Environmental Protection Agency (Cal/EPA) to compile, maintain, and update specified lists of hazardous material release sites. The CEQA Guidelines (California Public Resources Code, Section 21092.6) require the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any alternatives are identified on or near one or more hazardous materials release sites. The lists are collectively referred to as the “Cortese List” after the legislator who authored the legislation. Any future housing project proposed within City would be subject to PRC Section 21092.6 which would require both review of Cortese List databases and analysis of findings to be included in the designated CEQA documentation.

According to the Manhattan Beach General Plan, many businesses in the City, including dry cleaners and gas stations, can handle and transport hazardous materials. In addition, two “archive” sites in the City have been identified as Superfund sites under the Comprehensive Environmental Response, Compensation, and Liability Act

(CERCLA); however, according to the USEPA, these sites no longer pose an immediate or long-term risk to human health or the environment and further remedial action is planned for these sites under the Superfund Program (City of Manhattan Beach 2003).

The Manhattan Village residential area was previously an oil field that had large oil storage tanks. The area has a vapor recovery system which captures and recovers dilute volatile organic compounds and other hazardous air pollutants. Industrial uses in the adjacent City of El Segundo may affect Manhattan Beach residents, including the Chevron Oil Refinery and the El Segundo Generation Site (City of Manhattan Beach 2003).

The Manhattan Beach Fire Department Fire Prevention Division participates in a local hazardous materials program through a joint agreement with the Los Angeles County Fire Department. Division responsibilities include cleanup of spills, leaks, and illegal dumping, and monitoring hazardous materials within businesses in Manhattan Beach (City of Manhattan Beach 2003).

## 3.9.2 Regulatory Setting

### Federal

#### U.S. Environmental Protection Agency

Title 40 USC, Chapter 1, Subchapter I, Parts 260-265 – Solid Waste Disposal Act/ Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA), establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 USC, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names asbestos-containing material (ACM) as one of these materials. ACM use, removal, and disposal are regulated by USEPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 42 U.S. Code of Federal Regulations, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) provides for public access to information about chemical hazards. The EPCRA and its regulations included in Title 40 U.S.C. Parts 350-372 establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. USEPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 USC, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act (TSCA) of 1976 empowers USEPA to require reporting, record-keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and also sets requirements for the use, handling, and disposal of ACM as well as for lead-based paint (LBP) waste. As discussed above, USEPA has also established NESHAP, which govern the use, removal, and disposal of ACM as a hazardous air pollutant and mandate the removal of friable ACM before a building is demolished and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

#### Regional Screening Levels (RSLs)

The federal EPA provides regional screening levels for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) incorporated the EPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment (HHRA) Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the EPA RSLs. The DTSC-RSL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

#### U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 USC, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.



## Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

## State

### California Unified Program for Management of Hazardous Waste and Materials

California Health and Safety Code (HSC), Division 20, Chapter 6.11, Sections 25404- 25404.9 Sections– Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the California Environmental Protection Agency (CalEPA), the Department of Toxic Substances Control (DTSC) and Enforcement and Emergency Response Program (EERP) administer the technical implementation of California’s Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC 2019). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California HSC made by SB 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act (APSA) Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan (HMMP) and Hazardous Material Inventory Statements (HMIS)
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the City is the LACFD working jointly with the Manhattan Beach Fire Department

## Hazardous Waste Management

Title 22 CCR, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In the State of California, the Department of Toxic Substances Control (DTSC) regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off-

site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31 – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every four years and, as applicable, select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste, including ACM and PCBs, among others.

#### Title 22 California HSC, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

#### Human Health Risk Assessment Note 3 –DTSC-Modified Screening Levels (DTSC-SLs)

HHRA Note Number 3 presents recommended screening levels (derived from the EPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-SL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

#### Environmental Cleanup Levels

##### Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by San Francisco Bay Regional Water Quality Control Board; however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California currently use the ESLs (as opposed to RSLs). In general, the ESLs could be used at any site in the State of California, provided all stakeholders agree. In Dudek’s recent experience, regulatory agencies in the southern California region use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a leaking underground storage tank (LUST); those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

#### California Integrated Waste Management Board

##### Title 14 CCR, Division 7, Chapter 8.2 – Electronic Waste Recovery and Recycling Act of 2003

This regulation sets requirements regarding the use and disposal of hazardous substances in electronics. When discarded, the DTSC considers the following materials manufactured before 2006 to be hazardous waste: cathode ray tube devices, liquid crystal display (LCD) desktop monitors, laptop computers with LCD displays, LCD televisions, plasma televisions, and portable DVD Players with LCD screens.

## Occupational Safety and Health

### Title 8 CCR – Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the CCR. CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances.

In Division 1, Chapter 4, Subchapter 4 – Construction Safety Orders of Title 8, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

## Asbestos and Air Quality

### Enforcement of the NESHAP Regulation, HSC Section 39658(b)(1)

The California Air Resources Board (CARB) is responsible for overseeing compliance with the federal Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) in Los Angeles County. The Asbestos NESHAP Program enforces compliance with the federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulation for asbestos and investigates all related complaints, as specified by HSC Section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these "non-delegated" districts, a demolition/renovation notification is required for compliance with the Asbestos NESHAP. (This notification is not equivalent to a permit.) CARB reviews and investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and US EPA to facilitate communication and enforcement continuity and assists US EPA in training district staff to enforce the asbestos NESHAP.

## Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

## Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations are as follows:

### California Health & Safety Code Sections 124125 to 124165

Declared childhood lead exposure as the most significant childhood environmental health problem in the State. Established the Childhood Lead Poisoning Prevention Program and instructed it to continue to take steps necessary to reduce the incidence of childhood lead exposure in California.

### California Health & Safety Code Sections 105275 to 105310

Reaffirmed California's commitment to lead poisoning prevention activities; provided CDPH with broad mandates on blood lead screening protocols, laboratory quality assurance, identification, and management of lead exposed children, and reducing lead exposures.

### California Health & Safety Code Section 105250

Establishes a program to accredit lead-related construction training providers and certify individuals to conduct lead-related construction activities.

### California Civil Code Section 1941.1; California Health & Safety Code Sections 17961, 17980, 124130, 17920.10, 105251 to 105257

Deems a building to be in violation of the State Housing Law if it contains lead hazards and requires local enforcement agencies to enforce provisions related to lead hazards. Makes it a crime for a person to engage in specified acts related to lead hazard evaluation, abatement, and lead-related constructions courses, unless certified or accredited by the Department. Permits local enforcement agencies to order the abatement of lead hazards or issue a cease and desist order in response to lead hazards.

### California Civil Code Sections 1102 to 1102.16

Requires the disclosure of known lead-based paint hazards upon sale of a property.

### California Education Code Sections 32240 to 32245

Implemented a lead poisoning prevention and protection program for California schools for a survey to ascertain risk factors that predicted lead contamination in public schools. The survey was completed in 1998. Findings of the survey are under Materials and Products.

### California Labor Code Sections 6716 to 6717

Provides for the establishment of standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation, and repair.

### California Health & Safety Code Sections 116875 to 116880

Requires the use of lead-free pipes and fixtures in any installation or repair of a public water system or in a facility where water is provided for human consumption.

### California Health & Safety Code Sections 105185 to 105197

Establishes an occupational lead poisoning prevention program to register and monitor laboratory reports of adult lead toxicity cases, monitor reported cases of occupational lead poisoning to ascertain lead poisoning sources, conduct investigations of take-home exposure cases, train employees and health professionals regarding occupational lead poisoning prevention, and recommended means for lead poisoning prevention.

## California Building Standards Commission

### Title 24 of the CCR – California Building Standards Code

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the Code contains requirements regarding the storage and handling of hazardous materials. The Chief Building Official at the local government level (i.e., City of Manhattan Beach) must inspect and verify compliance with these requirements prior to issuance of an occupancy permit.

### California Building Code – Chapter 7A

This chapter of the California Building Code establishes minimum standards for buildings located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire.

## California State Fire Marshal

### Title 19 CCR, Division 1, Chapter 10 – Explosives

This regulation addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local Fire Chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained in Chapter 10 of Title 19.

## California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.

## California Accidental Release Prevention Program

Similar to the EPA Risk Management Program, the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit a hazardous materials business

plan (HMBP) to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is further required to specify applicability of other state regulatory programs. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

## California Dig Alert

### CA Government Code 4216

In accordance with CA Government Code 4216.2, an excavator planning to conduct an excavation shall notify the appropriate regional notification center of the intent to excavate between two and fourteen calendar days prior to excavation activities. When the excavation is proposed within 10 feet of a “high priority subsurface installation”, which includes high pressure natural gas and petroleum pipelines, the operator of the high priority subsurface installation shall notify the excavator of the existing of the installation and set up an onsite meeting to determine actions required to verify location and prevent damage to the installation. The excavator shall not begin excavating until the onsite meeting is complete.

## Regional and Local

### South Coast Air Quality Management District

#### Rule 1403: Work Practice Requirements for Asbestos

SCAQMD Rule 1403 governs work practice requirements for asbestos in all renovation and demolition activities. The rule includes requirements for asbestos surveying, notifications, ACM removal procedures, schedules, handling and clean-up procedures, and storage, disposal, and landfill requirements for waste materials. All operators are also required to maintain records and use appropriate labels, signs, and markings.

### City of Manhattan Beach General Plan

The City’s General Plan includes the following goals and policies related to hazards and hazardous materials:

Goal CS-1: Minimize the risks to public health, safety, and welfare resulting from natural and human caused hazards.

Policy CS-1.8: Participate in Federal, State, and local earthquake preparedness and emergency response programs.

Goal CS-2: Protect residents from hazardous materials and the hazards associated with the transport of such materials.

Policy CS-2.1: Continue to encourage and support the enforcement of state and federal environmental and pollution control laws.

Policy CS-2.2: *Continue to support and encourage state and federal efforts to identify existing or previously existing hazardous waste generators or disposal sites and monitor disposal of all wastes and contamination of their sites.*

Policy CS-2.3: Continue to monitor underground emissions and associated hazards in Manhattan Village and in other areas adjacent to industrial uses.

Policy CS-2.4: Promote the routing of vehicles carrying potentially hazardous materials along transportation corridors that reduce public exposure to risk. Cooperate with regional agencies in developing such routing systems.

Policy CS-2.6: Develop and support an educational program to assist small users (individuals and households) to dispose of small quantities of hazardous materials.

Policy CS-2.7: Continue to monitor the potential environmental risks posed by industrial users in the City and adjacent jurisdictions, and actively work with State, Federal, and other agencies to prevent and mitigate any accidents

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.2: Cooperate with other jurisdictions in the South Bay area to maintain an up-to-date emergency response system for the region.

## Manhattan Beach Municipal Code

### **Chapter 5.76, Liability for Costs of Response to Hazardous Waste or Substance Spills, Releases, and Other Incidents**

This chapter establishes liability for reimbursement of the City's expenses incurred in connection with corrective action necessitated by violations of the hazardous waste and substance control laws.

#### **Section 10.60.120(D) Hazardous and extremely hazardous materials.**

The use, handling, storage, and transportation of hazardous and extremely hazardous materials shall comply with the provisions of the California Hazardous Materials Regulations (California Code of Regulations, Title 22, Division 4).

#### **Section 14.48.030, Parking of vehicles transporting hazardous material.**

This section of the MBMC contains regulations related to the transportation of a hazardous material or substance as identified in Title 49 of the Code of Federal Regulation (CFR). Key components of this section include the requirement that all vehicles transporting Title 49 waste or substances must be attended at all times by its driver or a qualified representative of the motor carrier that operates it. The vehicle cannot be parked on any highway, highway shoulder, street, alley, public way or public place, or within five feet of the traveled portion thereof, within a residential zone or within 1,000 feet of any school or within 300 feet of any bridge or tunnel, except for brief periods when mechanical or equipment failure or disablement or malfunction of the vehicle, or the necessities of operation require the vehicle to be parked and make it impractical to park the vehicle in any other place.

### 3.9.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



- a) ***Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

**Less Than Significant Impact.** Demolition and construction activities associated with future housing development facilitated by the HEU could require transport of hazardous materials (e.g., asbestos-containing materials, lead-based paint, and/or contaminated soils); however, this would be evaluated on a case-by-case basis.

Numerous federal, State, and local requirements exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. These requirements would apply to those transporting, using, or disposing of hazardous materials, and would include: the RCRA, which provides the cradle to grave regulation of hazardous wastes; CERCLA, which regulates closed and abandoned hazardous waste sites; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; IFC, which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; Title 22, which regulates the generation, transportation, treatment, storage and disposal of hazardous waste; and Title 27, which regulates the treatment, storage and disposal of solid wastes.

Furthermore, residential development sites within the City are not expected to transport, use, store, or dispose of substantial amounts of hazardous materials, with the exception of common residential-grade hazardous materials such as household cleaners and paint. If needed, the City provides an annual hazardous waste collection program, where residents would be allowed to dispose of household hazardous waste free of charge at the Community Hazardous Waste Collection Facility in Redondo Beach (City of Manhattan Beach 2003).

Additionally, approval of the HEU, as a policy document, would not change these regulations and would not provide any goals, policies, or programs that would significantly increase the exposure of hazardous materials to the public and the environment. Therefore, the HEU does not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation is required.

- b) ***Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

**Less Than Significant Impact.** Please see Threshold 3.9(a), above. The HEU is a policy document, and therefore, adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Implementation of the HEU would also not result in the routine use, transport, or disposal of hazardous materials or generate significant quantities of hazardous materials. As such, impacts related to transport, use, and disposal of hazardous materials would be less than significant, and no mitigation is required.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**Less Than Significant Impact.** Please see Threshold 3.9(a), above. The HEU is a policy document, and therefore, adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Implementation of the HEU would also not result in the routine use, transport, or disposal of hazardous materials or generate significant quantities of hazardous materials. As such, impacts related to the emission of hazardous materials within one-quarter mile of an existing or proposed school would be less than significant, and no mitigation is required.

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

**Less Than Significant Impact.** All sites of future residential projects will be evaluated using appropriate databases including the California Department of Toxic Substances Control (DTSC) EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects will be assessed at the time the projects are actually proposed.

Additionally, the HEU is a policy document and adoption would not itself, result in negative environmental impacts. However, implementation of the programs contained in the document will accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, impacts would be less than significant, and no mitigation is required.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

**No Impact.** The City is located more than two miles away from the Los Angeles International Airport, the closest airport to the City. No private airstrip is located within or adjacent to Manhattan Beach. As such, no impacts would occur.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**No Impact.** The City's General Plan contains specific goals and polices to maintain effective and high-quality emergency response services for the community, including cooperating with other South Bay jurisdictions to maintain an up-to-date regional emergency response system; disseminating information to residents, businesses, and schools on preparing for and responding to natural disasters; and ensuring that all street signs and street numbers are visible and legible to minimize emergency response time (City of Manhattan Beach 2003). The HEU is a policy document identifying how the City would provide additional capacity for the future construction of 479 units, which would be constructed on infill sites

given the developed nature of the City. As such, with the addition of future residences, there would be an increased demand for services, but no construction would occur such that the HEU would impair implementation of, or physically interfere with, an adopted emergency response or evaluation plan. No physical impacts would occur.

**g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

**No Impact.** According to the City’s General Plan EIR, there are no wildlands in Manhattan Beach. As such, there would be no potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No impact would occur.

### 3.9.4 References

City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed October 2, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.

## 3.10 Hydrology and Water Quality

### 3.10.1 Environmental Setting

#### Surface Water

##### Santa Monica Bay Watershed Area

The majority of City land is located within the Santa Monica Bay Watershed area, which covers approximately 177 square miles of Los Angeles County. The watershed drains into the Pacific Ocean and includes the Dominguez Channel. Other municipalities that fall within the boundaries of this Watershed Area include Carson, Los Angeles, Torrance, Los Angeles County, Gardena, Redondo Beach, Inglewood, Rancho Palos Verdes, El Segundo, Lomita, Lawndale, Rolling Hills Estates, Hermosa Beach, Rolling Hills, Compton, Hawthorne, and Palos Verdes Estates (LACDPW 2021). The City is generally classified as being the South Santa Monica Bay Watershed which is highly urbanized, consisting of approximately 76% built environment and 16% open space (LACDPW 2005).

##### Dominguez Watersheds

According to the County of Los Angeles Department of Public Work, (2021b) the Dominguez Watershed is located within the southern portion of Los Angeles County and encompasses approximately 133 square miles of land and water. Approximately 81% of the watershed or 93% of the land is developed. Residential development covers nearly 40% of the watershed, and another 41% is made up by industrial, commercial and transportation uses. With a population of nearly 1 million, considerable demands are made on infrastructure and services within the watershed. Water supply is limited, and the majority of water use is from imported sources. Parkland and open space are in short supply and generally are deficient (LACDPW 2021).

## Water Quality

Existing, potential or intermittent beneficial uses for the Santa Monica Bay, where stormwaters from the City are discharged and for the underlying groundwater basins in the City (West Coast Basin) include: navigation (NAV); Water Recreation (REC-1, REC-2); commercial and sport fishing (COMM); marine habitat (MAR); wildlife habitat (WILD); spawning, Reproduction, and/or early development (SPWN); and shellfish harvesting (SHELL)(EWMP 2018). Under Clean Water Act Section 303(d), the State of California is required to develop total maximum daily loads (TMDLs), which define how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. TMDLs have been established for impaired water bodies in throughout California. Including the Santa Monica Bay Beaches, and the Santa Monica Bay (EWMP 2018). High priority pollutants with established TMDLs in the beaches and the Bay and include dry and wet weather bacteria, trash/debris, Dichloro-diphenyl-trichloroethane (DDT) and Polychlorinated Biphenyls (PCB) (EWMP 2018).

## Storm Drainage

Stormwater runoff flows directly into the City's storm drain system via street gutters and other inlets, and this flow in turn discharges into the County of Los Angeles flood control network, which ultimately drains into the Pacific Ocean (City of Manhattan Beach 2003a). The Los Angeles County Department of Public Works (LACDPW) maintains the regional storm drain system, including two major pumping plants (Polliwog Pond and Johnson Street) in the City (City of Manhattan Beach 2003a). With regard to capacity, the established system is adequate to handle most stormwater runoff. However, during unusually heavy storm events, the system can become overwhelmed.

The Federal Water Pollution Control Act prohibits the discharge of any pollutant to navigable waters from a point source unless the discharge is authorized by a National Pollutant Discharge Elimination System (NPDES) permit. Manhattan Beach participates in the NPDES permit program via a partnership consisting of the County, all cities within the County and the County Flood Control District (City of Manhattan Beach 2003a). Polliwog Park contains storm drainage facilities to help reduce pollutants entering the storm drain system, which also has the added benefit of recharging groundwater supplies. The City has also installed several storm water filtration devices called continuous deflective separation (CDS) units at strategic locations throughout the City (City of Manhattan Beach 2003a). The CDS units are designed to capture and retain sediments, floatable and settleable trash and debris before the runoff enters the ocean. Stormwater passes through the CDS system and returns to the storm drain system, while debris and coarse sediments are retained and settled into a sump where they can be collected and hauled away (City of Manhattan Beach 2003a).

## Groundwater

According to the West Basin Municipal Water District (2021), the West Coast Groundwater Basin (Basin) underlies 160 square miles in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County, including the City of Manhattan Beach. The Basin extends southwesterly along the coast from the Newport-Inglewood Uplift to the Santa Monica Bay. The Basin provides groundwater to approximately 11 cities and unincorporated areas of Los Angeles County. This average annual production is roughly 52,000 Acre-feet (AF), which accounts for 20% of total retail demands (WBMWD 2021). Basin groundwater within the City is extracted by City owned and operated wells (City of Manhattan Beach 2003b). The City is allowed to pump approximately 3.8 million gallons per year (City of Manhattan Beach 2003b).

## Flooding

The Federal Emergency Management Agency (FEMA) provides flood hazard and risk data to help guide mitigation actions. Flood mapping is an important part of the National Flood Insurance Program, as it is the basis of National Flood Insurance Program regulations and flood insurance requirements. The land area east of the beach is not located within a FEMA-designated Special Flood Hazard Area and is designated as Zone X (an area of minimal flooding potential). However, the sandy beach area, where non-habitable development exists, is designated as AE, which is defined as a high-risk areas have at least a 1% annual chance of flooding (County of Los Angeles 2021a, 2021b).

### 3.10.2 Regulatory Setting

#### Federal

##### National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate FEMA to evaluate flood hazards. FEMA provides flood insurance rate maps for local and regional planners to promote sound land use and floodplain development, identifying potential flood areas based on the current conditions. To delineate a flood insurance rate map, FEMA conducts engineering studies referred to as flood insurance studies. Using information gathered in these studies, FEMA engineers and cartographers delineate Special Flood Hazard Areas on flood insurance rate maps.

##### Clean Water Act

The Clean Water Act (CWA) (33 USC 1251 et seq.), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” Key sections of the act are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives and establish TMDLs for each pollutant/stressor.
- Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. As there are no federal jurisdictional waters within the areas identified in the sites analysis as having potential to accommodate future residential development, no water quality certification under CWA Section 401 would be required.
- Section 406 establishes NPDES, a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs), which have several programs that implement individual and general permits related to construction activities, municipal stormwater discharges, and various kinds of non-stormwater discharges. State and regional water quality related permits and approvals, including NPDES permits, are discussed below.
- Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program is jointly administered by the U.S. Army Corps of Engineers and the U.S.

Environmental Protection Agency. As there are no federal jurisdictional waters within the areas identified in the sites analysis as having potential to accommodate future residential development, the HEU, or future development pursuant to the HEU, would not require a permit under CWA Section 404.

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes the USEPA and the U.S. Army Corps of Engineers. At the State level, with the exception of tribal lands, the Cal/EPA and its sub-agencies, including the SWRCB, have been delegated primary responsibility for administering and enforcing the CWA in California.

### Federal Antidegradation Policy

The Federal Antidegradation Policy (40 CFR 131.12) requires states to develop statewide antidegradation policies and identify methods for implementation. Pursuant to the Code of Federal Regulations (CFR), state antidegradation policies and implementation methods shall, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the State finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

### State

#### Porter-Cologne Water Quality Act (California Water Code)

The Porter-Cologne Act (codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter-Cologne Act applies to waters of the State, which includes isolated wetlands and groundwater in addition to federal waters. This act is implemented by the SWRCB and the nine RWQCBs. In addition to other regulatory responsibilities, the RWQCBs have the authority to conduct, order, and oversee investigation and cleanup where discharges or threatened discharges of waste to waters of the State could cause pollution or nuisance, including impacts to public health and the environment.

The act requires a “Report of Waste Discharge” for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code Section 13260 subdivision (a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system that could affect the quality of the waters of the state, to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both State and federal law. For other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the State (such as groundwater and isolated wetlands), waste discharge requirements (WDRs) are required and are issued exclusively under state law. WDRs typically require many of the same BMPs and pollution control technologies as required by NPDES-derived permits.

#### California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the

State (e.g., isolated wetlands and groundwater), not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained, and discharge to that water body shall not unreasonably affect present or anticipated beneficial use of such water resources.

### **California Toxics Rule**

The U.S. Environmental Protection Agency has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule established acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by each RWQCB as having beneficial uses protective of aquatic life or human health.

### **NPDES and WDR Permits**

NPDES and WDR programs regulate construction, municipal, and industrial stormwater, and non-stormwater discharges under the requirements of the CWA and the Porter–Cologne Water Quality Control Act. The Construction Stormwater Program is administered by the SWRCB, while the Municipal Stormwater Program and other WDRs are administered by the Los Angeles RWQCB. The Manhattan Beach Public Works Department enforces NPDES requirements, which are adopted as part of the MBMC.

### **Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended)**

Pursuant to CWA Section 406(p), requiring regulations for permitting of certain storm water discharges, the SWRCB has issued a statewide General Permit for Stormwater Discharges Associated with Construction Activity and Land Disturbance Activities (Order No. 2010-0014-DWQ, adopted by the SWRCB on November 16, 2010, and effective February 14, 2011).

Under this Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing and filing permit registration documents, which include a Notice of Intent and Stormwater Pollution Prevention Plan (SWPPP), prior to the commencement of construction activity. SWPPPs incorporate erosion control, sediment removal, and construction waste management control measures during construction, site stabilization measures in the short-term post-construction period, and may identify BMPs for post-construction land use.

Dischargers must file a Notice of Termination when construction is complete and final stabilization has been reached or ownership has been transferred. The discharger must certify that all state and local requirements have been met in accordance with this Construction General Permit. For construction to be found complete, the discharger must install post-construction storm water management measures and establish a long-term maintenance plan.

### **California Water Plan**

Required by the California Water Code Section 10005(a), the California Water Plan, prepared by the California Department of Water Resources, is the state government’s strategic plan for managing and developing water resources statewide for current and future generations and provides a framework for water managers, legislators, and the public to consider options and make decisions regarding California’s water future. The California Water

Plan, which is updated every five years, presents basic data and information on California’s water resources, including water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The California Water Plan also identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the state’s water needs.

The goal for the California Water Plan Update is to meet California Water Code requirements. This plan received broad support among those participating in California’s water planning, and is a useful document for the public, water planners throughout the State, legislators, and other decision-makers.

### **California Green Building Standards Code**

The California Green Building Standards Code (CALGreen Code), Part 11 of the California Building Standards Code (Title 24) is designed to improve public health, safety, and general welfare by using design and construction methods that reduce the negative environmental impact of development and to encourage sustainable construction practices. The CALGreen Code provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including, but not limited to, site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards designed to encourage developers and cities to aim for a higher standard of development.

### **California Building Code**

Pursuant to California Government Code Section 50022.2, the California Building Code, 2019 Edition, published at Title 24, Part 2, of the California Code of Regulations, including Appendices F, J, and O, and Standards ((including Section 1, Division 2; Chapter 31B and excluding all other Appendices), has been adopted by reference into the MBMC (Section 9.01.010), subject to the amendments, additions and deletions set forth in Chapter 9.01, Building Code.

### **Sustainable Groundwater Management Act**

The Sustainable Groundwater Management Act (SGMA) was signed into law in 2014. SGMA requires governments and water agencies of high- and medium-priority groundwater basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically overdrafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline for achieving sustainability. Through SGMA, the California Department of Water Resources provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans for crucial groundwater basins in California.

## **Regional and Local**

### **Water Quality Control Plan, Los Angeles Region**

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the



SWRCB and its nine RWQCBs. The SWRCB provides state-level coordination of the water quality control program by establishing statewide policies and plans for implementation of state and federal regulations. The nine RWQCBs throughout California adopt and implement Basin Plans that recognize the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, and water quality problems. The Los Angeles RWQCB is responsible for the protection of the beneficial uses of waters within the coastal watersheds of Los Angeles and Ventura counties.

The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Los Angeles RWQCB Basin Plan) designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code Sections 13240–13247) (LARWQCB 2014). The Los Angeles RWQCB Basin Plan must conform to the policies set forth in the Porter-Cologne Act as established by the SWRCB in its state water policy. The Porter-Cologne Act also provides the RWQCBs with authority to include within their basin plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The Los Angeles RWQCB Basin Plan is continually being updated to include amendments related to implementation of TMDLs of potential pollutants or water quality stressors, revisions of programs and policies within the Los Angeles RWQCB Region, and changes to beneficial use designations and associated water quality objectives.

Municipal Stormwater Permit (Los Angeles RWQCB Order No. R4-2012-0175-A01, as amended), NPDES Permit No. CAS004001

The Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, except those discharges originating from the City of Long Beach MS4 (MS4 Permit) covers 88 cities and most of the unincorporated areas of Los Angeles County. Under the MS4 Permit, the Los Angeles County Flood Control District is designated as the Principal Permittee. The Permittees are the 88 Los Angeles County cities and Los Angeles County. Collectively, these (including the City of Los Angeles) are the “Co-Permittees.” The Principal Permittee helps to facilitate activities necessary to comply with the requirements outlined in the MS4 Permit but is not responsible for ensuring compliance of any of the other Permittees.

The Los Angeles RWQCB adopted WDRs for MS4 discharges within the Coastal Watersheds of Los Angeles County on June 18, 1990 (Order No. 90-079; NPDES Permit No. CA0061654). The WDRs were later amended on December 13, 2001 (Order No. 01-182; NPDES Permit No. CAS004001, as amended). The current MS4 Permit (Order No. R4-2012-0175; NPDES Permit No. CAS004001) was adopted on November 8, 2012 and became effective on December 28, 2012.

The MS4 Permit contains effluent limitations, receiving water limitations, minimum control measures, and TMDL provisions, and outlines the process for developing watershed management programs, including the Enhanced Watershed Management Program (EWMP). The MS4 Permit incorporates the TMDL waste load allocations applicable to dry- and wet-weather as water quality-based effluent limitations and/or receiving water limitations. The MS4 Permit adopts low-impact development (LID) principles and requires development and redevelopment projects to incorporate stormwater management strategies with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible,

the use of bioretention, rain gardens, green roofs, cisterns, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used.

### Beach Cities Enhanced Water Management Program

Following adoption of the MS4 NPDES Permit, the Cities of Hermosa Beach, Manhattan Beach, Redondo Beach and Torrance, together with the Los Angeles County Flood Control District (LACFCD), collectively referred to as the Beach Cities Watershed Management Group (WMG) agreed to collaborate on the development of an Enhanced Watershed Management Program (EWMP) for the Santa Monica Bay (SMB) and Dominguez Channel Watershed areas within their jurisdictions. The EWMP is intended to facilitate effective, watershed-specific Permit implementation strategies in accordance with Permit Part VI.C. Watershed Management Program. (EWMP 2018). The EWMP identifies watershed-specific water quality priorities outlines specific strategies, control measures and best management practices (BMPs) necessary to achieve water quality targets (including Water Quality Based Effluent Limitations [WQBELs] and Receiving Water Limitations [RWLs]); and conducts quantitative analyses to support target achievement and Permit compliance.

### City of Manhattan Beach General Plan

The following General Plan goals and polices are related to hydrology and water quality:

Policy LU-2.4: Support appropriate stormwater pollution mitigation measures.

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.2: Cooperate with other jurisdictions in the South Bay area to maintain an up-to-date emergency response system for the region.

Policy CS-3.5: Review the City's emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Goal I-9: Maintain a storm drainage system that adequately protects the health and safety and property of Manhattan Beach residents.

Policy I-9.1: Evaluate the size and condition of the storm drainage system periodically to ensure its ability to handle expected storm runoff.

Policy I-9.2: Evaluate the impact of all new development and expansion of existing facilities on storm runoff and ensure that the cost of upgrading existing drainage facilities to handle the additional runoff is paid for by the development which generates it.

Policy I-9.3: Support the use of storm water runoff control measures that are effective and economically feasible.

Policy I-9.4: Encourage the use of site and landscape designs that minimize surface runoff by minimizing the use of concrete and maximizing the use of permeable surface materials.

Policy I-9.5: Support appropriate storm water pollution mitigation measures.

Policy I-9.6: Discourage new development below street level in order to avoid flooding on public and private property in areas subject to flooding.

## Manhattan Beach Municipal Code

### Chapter 5.84 -Stormwater and Urban Runoff Pollution

Chapter 5.84 requires compliance with the Federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the Municipal National Pollutant Discharge Elimination System (NPDES) Permit by:

1. Reducing pollutants in storm water discharges to the maximum extent practicable;
2. Regulating illicit connections and illicit discharges, thereby reducing the level of contamination of storm water and urban runoff into the Municipal Separate Storm Sewer System (MS4) of the City of Manhattan Beach (City) and;
3. Regulating non-storm water discharges to the MS4.

The intent of this chapter is to ensure the future health, safety and general welfare of the citizens of the City and of the receiving waters of the County of Los Angeles and surrounding coastal areas to provide the City with the legal authority necessary to implement and enforce the requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and in the municipal NPDES permit to the extent that they are applicable in the City, to control discharges to and from those portions of the municipal storm water system (MS4) over which the City has jurisdiction as required by the municipal NPDES permit, and to hold dischargers to the MS4 accountable for their contributions of pollutants and flows.

### Section 7.44.020, Permanent water conservation measures.

Section 7.44.020 of the MBMC addresses water conservation and provides for permanent water conservation measures and drought restrictions. In addition, it established that water conservation requirements apply to 100% of projects that the City approves.

## City of Manhattan Beach Master Plans

### Wastewater System Master Plan (2010)

The objective of the Wastewater Master Plan is to evaluate the City's sewer collection system to provide a framework for undertaking the construction of new and replacement facilities for the service area in an efficient and cost-effective manner. It is designed to aid the City in meeting some of the requirements of the Statewide General Waste Discharge Requirements issued by the California Regional Water Quality Control Board in 2006.

### Water Master Plan (2010)

The purpose of the Water Master Plan (WMP) is to periodically evaluate the City's water system and provide a framework for undertaking the construction of new and replacement facilities for serving the water supply and distribution needs in an efficient manner. The WMP report presents the methodology, analyses, findings, and recommendations of a comprehensive study of the City's potable water system and describes the water system supplied by the West Basin Municipal Water District.

2015 Urban Water Management Plan (2017)

The City is a water supplier and is required to prepare an Urban Water Management Plan (UWMP) in accordance with the California Urban Water Management Planning Act (UWMP Act) which was established in 1983. The Act requires every “urban water supplier” to prepare and adopt a Plan, periodically review its Plan at least once every five years and make any amendments or changes which are indicated by the review. Pursuant to California Water Code Section 10617, an “Urban Water Supplier” is defined as a supplier, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The primary objective of the UWMP Act is to direct urban water suppliers to evaluate their existing water conservation efforts and, to the extent practicable, review and implement alternative and supplemental water conservation measures. The UWMP Act is directed primarily at retail water purveyors where programs can be immediately affected upon the consumer.

### 3.10.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

**Less Than Significant Impact.** The City has numerous safeguards in place related to water quality and safe discharge requirements. The Federal Water Pollution Control Act prohibits the discharge of any pollutant to navigable waters from a point source unless the discharge is authorized by a NPDES permit. Manhattan Beach participates in the NPDES permit program via a partnership consisting of the County and the County Flood Control District (City of Manhattan Beach 2003a). The City has established holding ponds and drainage facilities to help reduce pollutants entering the storm drain. The City has also installed CDS units in strategic locations around the City. Stormwater passes through the CDS system and returns to the storm drain system, while debris and coarse sediments are retained and settled into a sump where they can be collected and hauled away (City of Manhattan Beach 2003a). These established practices would help ensure that any future development facilitated by the HUE would not have an adverse impact on water quality.

All demolition, relocation and/or construction phases of future housing development would be subject to compliance with applicable local, regional, state and federal regulations designed to protect water resources, including those regulations requiring implementation of Best Management Practices (BMPs), preparation of SWPPPs, and submittal of Erosion Control Plans in compliance with NPDES provisions. Consistency with this regulatory framework would adequately ensure that such impacts would be avoided or reduced to less than significant.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate future development required to meet the City’s 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with hydrology and water quality. As such, impacts would be less than significant, and no mitigation is required.

- b) ***Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

**Less Than Significant Impact.** Groundwater within the City is extracted by City owned and operated wells. The City is allowed to pump approximately 3.8 million gallons per year of groundwater from the West Coast Basin. As outlined in the City's General Plan EIR, all future developments are required to comply with applicable state and local regulations that concern groundwater recharge, including the MBMC (City of Manhattan Beach 2003b). Additionally, the City's Polliwog Park contains storm drainage facilities to help reduce pollutants entering the storm drain system. Following rain events, water from the surrounding area flows into the park where it is held before being pumped into the storm drain system. One of the benefits of holding the water in the park is that some of the water is absorbed into the ground, recharging the groundwater basin. Pursuant to Los Angeles County NPDES permit requirements, new construction projects are implementing similar measures to remove pollutants from runoff (City of Manhattan Beach 2003a). As such, future development envisioned within the HEU would not adversely affect groundwater.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with groundwater or groundwater recharge. Impacts would be less than significant, and no mitigation is required.

- c) ***Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

- i) ***Result in substantial erosion or siltation on- or off-site;***
- ii) ***Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;***
- iii) ***Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; and/or***
- iv) ***Impede or redirect flood flows?***

**Less Than Significant Impact.** Future residential development accommodated by the adoption of the HEU would infiltrate stormwater in accordance with all applicable regulations, as described under Threshold 3.10(a), and would continue to outflow into the existing storm drain system. No naturalized drainages or creeks would be affected. As such, impacts would be less than significant, and no mitigation is required.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with hydrology and water quality. Additionally, the parcels identified in the HEU sites analysis as having the potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation consist of previously developed underutilized sites in urban and semi-urban locations throughout the City.

**d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?***

**Less Than Significant Impact.** Due to its topography and location, Manhattan Beach is not subject to seiches or mud flows. As the City is coastal and located adjacent to the Pacific Ocean, in the event of a tsunami, the beach area of the City may be inundated depending on the magnitude of the event. Large tsunamis can travel at speeds exceeding 600 miles per hour, and the length, from crest to crest, may be 60 miles or more. Yet the height of a tsunami, from trough to crest, may only be a few inches or feet. The threat for tsunamis in California can be considered relatively low given the low recurrence frequencies from these phenomena. However, the threat of a seismically induced undersea landslide off the Southern California coast exists. Because locally generated tsunamis provide little time for warning, the City's General Plan includes provisions to mitigate the impacts of natural hazards, including flooding due to a tsunami, within Goal CS-3 (and Policies CS-3.2, 3.5, 3.7, and 3.9). These policies require that the City maintain a high level of City emergency response services, cooperate with other jurisdictions in the South Bay area to maintain an up-to-date emergency response system for the region, periodically review the City's emergency equipment and shelters to ensure adequacy, and continue to upgrade the quality of emergency response through education and training of personnel (City of Manhattan Beach 2003b). These goals and policies would help ensure that the City maintains a high level of City emergency response services in the event of flood hazard, tsunami, or seiche.

The HEU is a policy document and adoption will not, in and of itself, result in environmental impacts. However, implementation of the programs contained in the document will accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate the City's 6<sup>th</sup> Cycle RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, impacts related to release of pollutants due to inundation would continue to be subject to the same regulations and guidance. Therefore, impacts would be less than significant, and no mitigation is required.

**e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

**Less Than Significant Impact.** As previously discussed under Threshold 3.10(a), future projects constructed following adoption of the HEU would comply with applicable water quality regulatory requirements, including implementation of a SWPPP, and stormwater BMPs, which would minimize potential off-site surface water quality impacts and contribute to a reduction in water quality impacts. The HEU also includes Program 31, which would facilitate review of the MBMC to encourage greener building

techniques that would improve water efficiency and consider opportunities above and beyond State requirements. Program 31 would also facilitate amending the MBMC, as needed, to conform to future amendments or updates to State Green Building Standards.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas. The environmental effects of construction and operation this will be evaluated at the time individual projects are proposed in a manner that would ensure that applicable water quality control plans or sustainable groundwater management plans not obstructed. As such, impacts from the HEU would be less than significant, and no mitigation is required.

### 3.10.4 References

- City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.
- City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.
- EWMP (Beach Cities Enhanced Watershed Management Program). 2018. Enhanced Watershed Management Program for the Beach Cities Watershed Management Area (Santa Monica Bay and Dominguez Channel Watersheds). Accessed October 2, 2021. [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/stormwater/municipal/watershed\\_management/beach\\_cities/BeachCities\\_EWMP\\_March%202018.pdf](https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/beach_cities/BeachCities_EWMP_March%202018.pdf).
- LACDPW (County of Los Angeles Department of Public Works). 2021. South Santa Monica Bay Watershed Area. Accessed October 3, 2021. <https://safecleanwaterla.org/south-santa-monica-bay-watershed-area/>.
- LACDPW. 2005. Total Maximum Daily Loads Regulations in the County of Los Angeles. Accessed October 2, 2021. [http://file.lacounty.gov/SDSInter/bos/bc/035787\\_TMDLletter10.05.pdf](http://file.lacounty.gov/SDSInter/bos/bc/035787_TMDLletter10.05.pdf)
- West Basin Municipal Water District. 2021. West Coast Groundwater Basin, Accessed October 5, 2021. <https://www.westbasin.org/water-supplies/groundwater/west-coast-groundwater-basin/>.

## 3.11 Land Use and Planning

### 3.11.1 Environmental Setting

The City is located in the southwest portion of the County of Los Angeles along the Pacific Ocean, approximately 19 miles southwest of Downtown Los Angeles. The City is bordered by El Segundo and the Chevron Oil Refinery to the north, Redondo Beach and Hawthorne to the east, Hermosa Beach to the south, and the Pacific Ocean to the west.



The City is made up of five distinct neighborhoods which are grouped into "planning areas" that reflect the City's unique and varied environment (City of Manhattan Beach 2003). These planning areas are as follows:

**Beach Area:** This area contains most of the City's multi-family rental housing. Lots in this area are small with generally less than 3,000 square feet, and parking for residents and visitors is in short supply. The General Plan calls for the maintenance and enhancement of the "Village" atmosphere within the downtown commercial district. The City's goal is to promote the preservation of the small specialty retail and service activities that serve both visitors to the beach and local residents while also encouraging mixed-used residential/commercial development.

**Hill Section:** This area consists primarily of single-family residential development, with commercial and higher-density residential development limited to Sepulveda Boulevard and Manhattan Beach Boulevard. The City's General Plan promotes the maintenance of single-family neighborhoods. Higher-density, multiple-family residential development is directed to those parcels located on either side of Manhattan Beach Boulevard, which is already developed with a mix of commercial and multifamily residential uses.

**East-Side/Manhattan Village:** This includes all the City's land area located east of Sepulveda Boulevard, and a large proportion of the City's commercial and residential uses are within this area. The City's land use policy calls for the preservation of the existing character of the residential neighborhoods located in the areas. Medium-and high-density residential development is located along Manhattan Beach Boulevard, Artesia Boulevard, and in areas adjacent to Manhattan Intermediate and Meadows schools, which are designated exclusively for multiple-family residential development. Manhattan Village includes a substantial amount of regional commercial and office development as well as a significant number of condominium units.

**Tree Section:** This is the portion of the City located to the east of Grand Avenue and northwest of Valley Drive. The area will remain almost exclusively single-family residential under the policies contained in the General Plan. A small portion of the area adjacent to Sepulveda Boulevard is designated for commercial uses.

**El Porto:** This area was formerly the unincorporated community of El Porto and is located north of 38th Street between the Pacific Ocean and the City of El Segundo. The area is developed with a mix of residential and commercial uses. El Porto has the highest residential development intensities found in the City. The General Plan protects the mix of multi-family and commercial development presently existing in this area.

As shown in Figure 3.1--1, Existing Land Use, and Figure 2.3-2, Existing Zoning, the City is primarily low density, single family residential, designated in the Land Use Element as Low Density Residential and zoned as RS. Medium and high-density residential areas (RM and RH zones) extend eastward from the City's coastline and comprise much of the City's LCP planning area. Other land use types include commercial, mixed-use, industrial, parks and open space, and public facilities. In accordance with the City's Planning and Zoning Code, the HEU identified five zones where it would be appropriate to locate future RHNA allocated dwelling units: Medium-Density Residential (RM) zone, in only Area District 3; High Density Residential (RH) zone in all Area Districts; and the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts. Figure 2.3-1, Area District Map, shows the location of the four City Area Districts.

The Planning and Zoning Code is the primary tool for implementing the General Plan, including as it applies to land use policy and applicable land use designations (City of Manhattan Beach 2030). As such, the RM, RH, CL, CD, and CNE zones must be consistent with the goals and policies outlined in their corresponding designations. Applicable designations are discussed in further detail below:

**Medium Density Residential:** The Medium Density Residential category allows single-family homes, duplexes, and triplexes, including condominiums. Multifamily housing with four or more units may be permitted subject to discretionary review and provided compatibility with surrounding development can be assured. Development densities may range from 11.6 to 32.3 units per acre. Other permitted uses include parks and recreation facilities, public and private schools, public safety facilities, and facilities for religious assembly, consistent with Planning and Zoning Code requirements, which may require discretionary review (City of Manhattan Beach 2003).

**High Density Residential:** The High Density Residential category accommodates all types of housing, and specifically housing development of a more intensive form, including apartments, condominiums, and senior housing. Residential projects may be constructed at a density of up to 51.3 units per acre. Other permitted uses include parks and recreation facilities, public and private schools, public safety facilities, and facilities for religious assembly, consistent with Planning and Zoning Code requirements, which may require discretionary review (City of Manhattan Beach 2003).

**Downtown Commercial:** The Downtown Commercial land use category applies only to the Downtown area, an area of approximately 40 blocks that radiate from the intersection of Manhattan Beach Boulevard and Manhattan Avenue. Downtown provides locations for a mix of commercial businesses, residential uses, and public uses, with a focus on pedestrian-oriented low-intensity commercial businesses that serve Manhattan Beach residents and visitors. Multifamily residential projects can be developed in accordance with the development standards for the High-Density Residential designation. The height limit in this district ranges from 26 feet to 30 feet depending on location.

**Local Commercial:** The Local Commercial land use category provides areas for neighborhood-oriented, small-scale professional offices, retail businesses, and service activities that serve the local community. Permitted uses are generally characterized by those which generate low traffic volumes, have limited parking needs, and generally do not operate late hours. Residential uses can be developed at densities consistent with the High-Density Residential designation. The height limit is 30 feet (City of Manhattan Beach 2003).

**North End Commercial:** Properties designated North End Commercial lie at the north end of the City, along Highland Avenue and Rosecrans Avenue between 33rd and 42nd Streets. Commercial uses are limited to small-scale, low intensity neighborhood-serving service businesses, retail stores, and offices. Restaurant and entertainment establishments are permitted only where zoning regulations can adequately ensure compatibility with residential uses. The maximum permitted FAR is 1.5:1. Residential uses can be developed at densities consistent with the High Density designation with a height limit of 30 feet (City of Manhattan Beach 2003).

In addition to the appropriately zoned and designated parcels identified in the sites analysis, the HEU also proposes a future rezoning program to facilitate additional housing needs required by HCD. The zoning districts included in the rezoning would be limited to the Planned Development District (PD) and the General Commercial District (CG).

The rezoning program, to be refined and implemented over an approximately three-year planning horizon, would allow for residential uses where they are not currently allowed and would increase permitted residential densities. The existing uses for the CG and PD are described below.

**General Commercial District:** The purpose of the GC district is to provide opportunities for the full range of retail and service businesses deemed suitable for location in Manhattan Beach, including businesses not permitted in other commercial districts because they attract heavy vehicular traffic or have certain adverse impacts; and to provide opportunities for offices and certain limited industrial uses that have impacts comparable to those of permitted retail and service uses to occupy space not in demand for retailing or services. The CG currently requires the issuance of a use permit for proposed mixed-use developments, which is considered a nonconforming use per the MBMC Section 10.12.020. Typically, all CG districts are within the CG land use designation (City of Manhattan Beach 2001).

**Planned Development District (PD):** An essential element of the PD is to establish a procedure for the development of parcels of land in order to reduce or eliminate the rigidity, delays, and inequities that otherwise would result from application of zoning standards and procedures designed primarily for small parcel ad hoc development. Although General Plan designations within the PD includes Parks/Open Space, the sites that could potentially undergo rezoning within the PD area are within parcels designated as Manhattan Village Commercial, a regional serving commercial district (City of Manhattan Beach 2001).

**Manhattan Village:** The Manhattan Village Commercial category applies to properties that lie within the Manhattan Village Mall area and are subject to discretionary approval requirements. Commercial uses in Manhattan Village are generally regional-serving, including shopping centers, large department and specialty stores, and entertainment and restaurant establishments. The maximum FAR is 1.5:1 (City of Manhattan Beach 2003).

Many of the areas identified in the sites analysis for potential rezoning are located within the CG zones along Sepulveda Boulevard. Sepulveda Boulevard is the only State Highway in Manhattan Beach. As a major transportation corridor for the South Bay region, Sepulveda Boulevard also functions as a commercial corridor. With the heavy traffic volumes and associated noise impacts, adequate buffering of the residential uses behind Sepulveda Boulevard from such impacts is important. The scale and character of commercial development along Sepulveda Boulevard is also an important community concern. In response to these issues, the City adopted the Sepulveda Boulevard Design Guidelines to provide a framework for future development along this corridor (City of Manhattan Beach 1999, 2003).

## 3.11.2 Regulatory Setting

### Federal

There are no federal regulations related to land use and planning relevant to the HEU.

## State

### State Planning Law and Complete Streets Act

State planning law (California Government Code Section 65300) requires every city and county in California to adopt a comprehensive, long-term general plan for the physical development of the jurisdiction and of any land outside its boundaries that, in the planning agency's judgment, bears relation to its planning (sphere of influence). A general plan should consist of an integrated and internally consistent set of goals and policies grouped by topic into a set of elements and guided by a jurisdiction-wide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the community that the general plan should address, such as hazards or flooding.

The Housing Element is one of the required elements of the General Plan. This Sixth Revision to the Housing Element complies with the California Government Code, beginning at Section 65583.

### California Coastal Act of 1976

The California Coastal Act (California Public Resource Code sections 30000 et seq.) was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100-mile coastline for the benefit of current and future generations. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the California Coastal Act (CCA) to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. The Coastal Act requires local governments (15 coastal counties and 59 cities) to create and implement LCPs that incorporate policies to protect, enhance and restore environmentally sensitive habitats, including intertidal and nearshore waters, wetlands, bays and estuaries, riparian habitat, certain wood and grasslands, streams, lakes and habitat for rare or endangered plants or animals, as well as the scenic beauty of coastal landscapes and seascape.

## Regional/Local

### Southern California Association of Governments

The City is a member of the Southern California Association of Governments (SCAG), which is the designated Metropolitan Planning Organization for the region. SCAG is required to update its Regional Transportation Plan/Sustainable Communities Strategy every 4 years, which puts all member jurisdictions on a schedule to update their Housing Elements every 8 years. SCAG is required to develop a final Regional Housing Needs Allocation (RHNA) methodology to distribute existing and projected housing need for the 6<sup>th</sup> Cycle RHNA allocation for each jurisdiction, which will cover the planning period October 2021 through October 2029. Following extensive feedback from stakeholders during the proposed methodology comment period and an extensive policy discussion, SCAG's Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to the State Department of Housing and Community Development for their statutory review. On January 13, 2020, the State Department of Housing and Community Development completed its review of the draft methodology and found that it furthers the five statutory objectives of RHNA, and on March 5, 2020, SCAG's Regional Council voted to approve the Final RHNA Methodology (SCAG 2020). On March 4, 2021, SCAG's Regional Council adopted the 6<sup>th</sup> Cycle Final RHNA Allocation Plan.

The HEU includes an update to the City's Housing Element and associated components to meet the RHNA requirements approved by SCAG.

### City of Manhattan Beach Local Coastal Program

The Local Coastal Program (LCP), which has been certified by the California Coastal Commission, is the basic planning tool used by Manhattan Beach to guide development in the coastal zone. The LCP contains the foundation policy for future development and protection of coastal resources, including the establishment, to the extent possible, of urban/rural boundaries and directing new housing and other development into areas with adequate services to avoid wasteful urban sprawl and leapfrog development. The LCP specifies appropriate location, type, and scale of new or changed uses of land and water and contains a designation in the Planning and Zoning Ordinance. Prepared by the City, this program governs decisions that determine the short- and long-term conservation and use of coastal resources. While the LCP reflects the unique characteristics of Manhattan Beach, the LCP must also be consistent with the CCA goals and policies. The CCA requires consistency between the LCP and General Plan. Section 30500.1 of the CCA provides that an LCP is not required to include housing policies and programs. However, Section 30007 states that local governments are not exempt from meeting requirements of State and federal law with respect to providing low- and moderate-income housing or other obligations related to housing. In those circumstances where an issue is addressed by both the LCP and General Plan, the terms of the LCP would generally prevail, including as it applies to general development aesthetics, views, and scenic vistas (City of Manhattan Beach 2003).

### Sepulveda Boulevard Development Guidelines

The City regulations for Sepulveda Boulevard development are primarily contained within Chapters 10.16 (Commercial Districts), 10.64 (Parking), and 10.52 and 10.60 (Miscellaneous) of the MBMC. The zoning districts found within the Sepulveda Corridor are CG, CC, and Single-Family Residential with the Oak Avenue Commercial Overlay (RS-D6). The guidelines are intended to encourage certain desirable elements to be included within development projects on the corridor. They are to be used as a supplement to the Planning and Zoning Code requirements during discretionary project reviews.

### City of Manhattan Beach General Plan

The Land Use Element of the General Plan provides the following goals and policies potentially relevant to the HEU (City of Manhattan Beach 2003).

Goal LU-1: Maintain the low-profile development and small-town atmosphere of Manhattan Beach.

Policy LU-1.1: Limit the height of new development to three stories where the height limit is thirty feet, or to two stories where the height limit is twenty-six feet, to protect the privacy of adjacent properties, reduce shading, protect vistas of the ocean, and preserve the low-profile image of the community.

Policy LU-1.2: Require the design of all new construction to utilize notches, balconies, rooflines, open space, setbacks, landscaping, or other architectural details to reduce the bulk of buildings and to add visual interest to the streetscape. Also referred to as the Bulk and Volume Ordinance (No. 2032).

Goal LU-2: Encourage the provision and retention of private landscaped open space.

Policy LU-2.1: Develop landscaping standards for commercial areas that unify and humanize each district.

Policy LU-2.2: Preserve and encourage private open space on residential lots citywide.

Policy LU-2.3: Protect existing mature trees throughout the City, and encourage their replacement with specimen trees whenever they are lost or removed

Policy LU-2.4: Support appropriate stormwater pollution mitigation measures.

Goal LU-3: Achieve a strong, positive community aesthetic.

Policy LU-3.1: Continue to encourage quality design in all new construction.

Policy LU-3.2: Promote the use of adopted design guidelines for new construction in Downtown, along Sepulveda Boulevard, and other areas to which guidelines apply.

Goal LU-4: Preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood's unique characteristics.

Policy LU-4.1: Protect public access to and enjoyment of the beach while respecting the privacy of beach residents.

Policy LU-4.2: Develop and implement standards for the use of walkstreet encroachment areas and other public right-of-way area

Policy LU-4.3: Continue to allow use of the public landscaped area of the Strand for limited private landscaping purposes.

Policy LU-4.4: Encourage the preservation and enhancement of unique residential homes and buildings throughout Manhattan Beach to preserve the culture and history of the City.

Policy LU-4.5: Encourage measures that recognize and work to protect buildings, landscaping, and other features important to the City's history.

Policy LU-4.6: When public improvements are made, they should preserve and maintain distinctive neighborhood characteristics.

Goal LU-5: Protect residential neighborhoods from the intrusion of inappropriate and incompatible uses.

Policy LU-5.1: Require the separation or buffering of residential areas from businesses which produce noise, odors, high traffic volumes, light or glare, and parking through the use of landscaping, setbacks, or other technique.

Policy LU-5.2: Work with all commercial property owners bordering residential areas to mitigate impacts and use appropriate landscaping and buffering of residential neighborhoods.

Policy LU-5.7: Recognize the unique qualities of mixed-use areas and balance the needs of both the residential and commercial uses.

Goal LU-7: Continue to support and encourage the viability of the Downtown area of Manhattan Beach.

Policy LU-7.6: Recognize the unique qualities of mixed-use development and balance the needs of both commercial and residential uses.

### 3.11.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project physically divide an established community?***

**Less Than Significant Impact.** Existing underutilized parcels throughout the City have been identified to accommodate 377 RHNA allocated residential dwelling units in the RM, RS, CL, CD, and CNE zones. In addition, to meet a capacity deficit of approximately 406 lower-income units, as well as 73 additional “buffer” low income units, the City has identified potential sites in the CG, PD, RM, and RS districts to be made available to accommodate residential uses appropriate for lower-income households (i.e., through a rezoning program) within the mandated three-year planning horizon.

The proposed rezoning areas for additional housing would encourage infill development in areas with existing infrastructure, rather than continuing sprawling land use patterns. These changes would not introduce radically different land uses into neighborhoods, propose new street patterns, or otherwise divide these areas. In addition, sites where existing or potential capacity has been identified to accommodate future housing are dispersed throughout the previously identified seven City zoning district and would not result in a large-scale grouping of residential developments. As such, the HEU would not physically divide an established community. Impacts would be less than significant, and no mitigation is required.

**b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

**Less Than Significant Impact.** The California Government Code requires that a General Plan prepared by a local government contain an integrated, internally consistent set of goals, policies, and programs. The structure of the Housing Element, as well as the HEU, which is one of the required elements within a General Plan, is built on the same foundation upon which all other elements of the plan were formed. In addition, the HEU goals complement those found in the other elements of the General Plan. Cohesive housing policies that are appropriate to Manhattan Beach were designed through this coordination.

The RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan (SCAG 2020). SCAG is required to develop a RHNA for existing and projected housing needs for each jurisdiction, which covers the planning period of October 2021 through October 2029. The City is required to ensure the availability of residential sites at adequate densities and with appropriate development standards to accommodate its fair share of the RHNA set forth by SCAG.

The HEU is a policy document that would update the General Plan to meet state Housing Element law. As described in Threshold 3.11(a), while the HEU is a policy document that is not anticipated to produce environmental impacts, the future rezoning effort included within the HEU would allow for greater densities than currently allowed within the City to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation. As a result, the HEU would be consistent and would meet the goals of the SCAG's Connect SoCal, the 2020–2045 RTP/SCS, which is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The future rezoning effort would encourage new development and redevelopment on infill parcels within urban and semi-urban areas of the PD, CG, RS, and RM zoning districts. In addition, implementation of any overlay or rezoning program would trigger additional CEQA review and the corresponding program level analysis, which would in-turn be required to assume the maximum build out made allowable by the proposed zone change(s). Therefore, impacts related to compatibility between the HEU and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant, and no mitigation is required.

### 3.11.4 References

City of Manhattan Beach. 1999. Sepulveda Boulevard Design Guidelines. Accessed October 30, 2021. <https://www.manhattanbeach.gov/Home/ShowDocument?id=83>.

City of Manhattan Beach. 2001. Manhattan Beach Municipal Code. Revised and republished 2001. Accessed September 19, 2021. [https://library.municode.com/ca/manhattan\\_beach/codes/code\\_of\\_ordinances?nodeId=MANHATTAN\\_BEACH\\_CALIFORNIAMUCO](https://library.municode.com/ca/manhattan_beach/codes/code_of_ordinances?nodeId=MANHATTAN_BEACH_CALIFORNIAMUCO).

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

SCAG (Southern California Association of Governments). 2020. The 2020–2045 Regional Transportation Plan /Sustainable Communities Strategy of the Southern California Association of Governments, Connect SoCal. <https://www.connectsocial.org/Documents/Adopted/fConnectSoCal-Plan.pdf>.

## 3.12 Mineral Resources

### 3.12.1 Environmental Setting

According to the Department of Conservation's Mineral Lands Classification map, the City is within the Mineral Resources Zone-3 within the San Fernando Valley Production-Consumption Region, which is characterized as areas containing mineral deposits of significance, which cannot be evaluated from available data (DOC 1979). Ordinarily, classification of a mineral deposit as MRZ-2a or MRZ-2b by the State Geologist will constitute adequate evidence



that an area contains significant mineral deposit; however, due to the highly built out nature of the City, current on-site land uses do not allow for oil/mineral extraction.

The City's Manhattan Village district occupies an area that was once devoted to extensive industrial uses, including a Chevron oil field (City of Manhattan Beach 2003a). However, the oil resources have been extracted, and there are no longer active wells in the City (City of Manhattan Beach 2003a, 2003b). Other than the defunct oil field, there are no known mineral resources of significant value within the City (City of Manhattan Beach 2003b).

## 3.12.2 Regulatory Setting

### Federal

There are no applicable federal policies or regulations related to mineral resources.

### State

Surface Mining and Reclamation Act: California Public Resources Code, Sections 2710 et seq.

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary regulator of onshore surface mining in the state. It delegates specific regulatory authority to local jurisdictions. The act requires the State Geologist (California Geological Survey) to identify all mineral deposits within the State and to classify them as (1) containing little or no mineral deposits; (2) containing significant deposits; or (3) deposits identified, but further evaluation is needed; (4) containing geologic information that does not rule out either the presence or absence of mineral deposits. Lands are designated MRZ-1, -2, -3, or -4, respectively. Local jurisdictions are required to enact specific procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. A particular concern of State legislators in enacting SMARA was the premature loss of minerals and protection of sites threatened by development practices that might preclude future mineral extraction.

### Mineral Resource Classification

The California Geological Survey Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by SMARA. Nonfuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. Urban preemption of prime deposits and conflicts between mining and other uses throughout California led to passage of SMARA, which requires all cities and counties to incorporate in their general plans the mapped designations approved by the State Mining and Geology Board.

The classification process involves the determination of P-C region boundaries based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C regional boundaries are modified to include only those portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. As previously noted, the classification of these mineral resources is a joint effort of the State and local governments and requires that the State Geologist classify the mineral resources area as one of the four MRZs, a Scientific Resource Zone, or an Identified Resource Area.

As part of the classification process, an analysis of site-specific conditions is utilized to calculate the total volume of aggregates within individually identified Resource Sectors. Resource Sectors are those MRZ-2 areas identified as having regional or statewide significance. Anticipated aggregate demand in the P-C region for the next 50 years is then estimated and compared to the total volume of aggregate reserves identified within the P-C region.

### California Geologic Energy Management Division

The California Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources, oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells, while working to help California achieve its climate change and clean energy goals. CalGEM publishes regular geographic information system data that includes updates to well locations and status, oil field boundaries, lease boundaries, and district boundaries. CalGEM also regulates the drilling, operation, and permanent closure of energy resource wells (CDOC 2021).

### Local

There are no applicable federal policies or regulations related to mineral resources.

## 3.12.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES</b> – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** Manhattan Village occupies an area that was once devoted to extensive industrial uses, including a Chevron oil field (City of Manhattan Beach 2003a). The oil resources have been extracted, and there are no longer active wells in the City. Other than the defunct oil field, there are no known mineral resources of significant value within the City (City of Manhattan Beach 2003b). Due to the built-out nature of the City and the lack of available mineral resources, the City has no General Plan or MBMC policies governing extraction of mineral resources. As such, no impact would occur.

- b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

**No Impact.** There are no locally important mineral resource recovery sites operating on or adjacent to the City (CDOC 2021). Although Manhattan Village occupies an area that was once a Chevron oil field, the oil resources have been extracted, and there are no longer active wells in the City (City of Manhattan Beach, 2003b). Other than the defunct oil field, there are no known mineral resources of significant value within the City (City of Manhattan Beach 2003b). As such, there are no locally important resources recovery sites that would be lost due to residential development facilitated by the HEU (City of Manhattan Beach 2003b), and no impact would occur.

### 3.12.4 References

CDOC (California Department of Conservation).2021. CalGEM GIS WellFinder. Accessed October 29, 2021. <https://maps.conservation.ca.gov/doggr/wellfinder/#/-118.40446/33.88608/14>.

CDOC. 1979. Generalized Aggregate Resources Classification Map, Special Report 143 Plate 2.1. [https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR\\_143-MLC-Report02.pdf](https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_143-MLC-Report02.pdf)City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29,2021.

## 3.13 Noise

### 3.13.1 Environmental Setting

The City recognizes that the ocean and coastal zone draw many residents and visitors and that the sounds associated with these areas, including crashing waves and shorebirds, are a valuable resource worth protecting. Excessive noise from traffic, business and industrial operations, construction, and concentrated activities can be disruptive and erode the quality of the City’s community. As such, the City strives to substantially reduce noise and its impacts within the urban environment, with a focus on protecting residential neighborhoods, schools, and similar noise-sensitive uses (City of Manhattan Beach 2003a).

In Manhattan Beach, vehicular traffic represents the primary noise source (City of Manhattan Beach 2003a). Major transportation-related noise sources include Sepulveda Boulevard, and arterials and collectors such as Rosecrans Avenue, Aviation Boulevard, Artesia Boulevard, Marine Avenue, Manhattan Beach Boulevard, Manhattan Avenue, Highland Avenue, and Valley/Ardmore. Vehicular traffic along collector streets that traverse residential neighborhoods, such as Valley Drive/Ardmore Avenue, Highland Avenue, and Manhattan Avenue, also impact residents living along these routes (City of Manhattan Beach 2003a). Stationary sources include industrial and commercial sources, particularly those emanating from the adjacent City of El Segundo, such as the El Segundo Generating Station and the Chevron Oil Refinery, as well as aircraft noise, construction noise and general neighborhood noise (City of Manhattan Beach 2003a).

## 3.13.2 Regulatory Setting

### Federal

#### Federal Transit Administration

In its *Transit Noise and Vibration Impact Assessment* guidance manual, the FTA recommends a daytime construction noise level threshold of 80 dBA  $L_{eq}$  over an 8-hour period (FTA 2018) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels. In this case, the County does enumerate noise and vibration level limits; thus, FTA guidance is merely informative with respect to noise assessment for purposes of the HEU.

### State

#### Government Code Section 65302(g)

California Government Code Section 65302(g) requires the preparation of a Noise Element in a General Plan, which shall identify and appraise the noise problems in the community. The Noise Element shall recognize the guidelines adopted by the Office of Noise Control in the State Department of Health Services and shall quantify, to the extent practicable, current and projected noise levels for the following sources:

- Highways and freeways
- Primary arterials and major local streets
- Passenger and freight on-line railroad operations and ground rapid transit systems
- Aviation and airport-related operations
- Local industrial plants
- Other ground stationary noise sources contributing to the community noise environment

#### California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research (OPR), provides guidance for the acceptability of specific land use types within areas of specific noise exposure. Table 4.13-3 presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. OPR guidelines are advisory in nature. Local jurisdictions, including the City of Manhattan Beach, have the responsibility to set specific noise standards based on local conditions.

**Table 3.13-1. Land Use Compatibility for Community Noise Environments**

Land Use Type	Community Noise Exposure (CNEL)			
	Normally Acceptable <sup>1</sup>	Conditionally Acceptable <sup>2</sup>	Normally Unacceptable <sup>3</sup>	Clearly Unacceptable <sup>4</sup>
Residential-low density, single-family, duplex, mobile homes	50-60	55-70	70-75	75-85
Residential – multiple-family	50-65	60-70	70-75	70-85
Transit lodging – motel, hotels	50-65	60-70	70-80	80-85
Schools, libraries, churches, hospitals, nursing homes	50-70	60-70	70-80	80-85
Auditoriums, concert halls, amphitheatres	NA	50-70	NA	65-85
Sports arenas, outdoor spectator sports	NA	50-75	NA	70-85
Playgrounds, neighborhood parks	50-70	NA	67.5-77.5	72.5-85
Golf courses, riding stables, water recreation, cemeteries	50-70	NA	70-80	80-85
Office buildings, business commercial and professional	50-70	67.5-77.5	75-85	NA
Industrial, manufacturing, utilities, agriculture	50-75	70-80	75-85	NA

Source: OPR 2017.

Notes: CNEL = community noise equivalent level; NA = not applicable

- 1 Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
- 2 Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
- 3 Normally Unacceptable: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.
- 4 Clearly Unacceptable: New construction or development should generally not be undertaken.

### California Code of Regulations Title 24

The State of California has adopted noise standards in areas of regulation not preempted by the federal government. State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. State regulations governing noise levels generated by individual motor vehicles and occupational noise control are not applicable to planning efforts, nor are these areas typically subject to CEQA analysis. State noise regulations and policies applicable to the HEU include Title 24 requirements and noise exposure limits for various land use categories.

The 2019 California Building Code (CBC, Part 2, Title 24, Section 1204.6, California Code of Regulations) stipulates “interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (L<sub>dn</sub>) or the community noise equivalent level (CNEL)” (ICC 2019).

## Local

### City of Manhattan Beach General Plan

The Noise Element of the General Plan provides the following goals and policies potentially relevant to the HEU (City of Manhattan Beach 2003).

Goal N-1: Provide for measures to reduce noise impacts from transportation noise sources

Policy N-1.1: Use proven methods of reducing the transmission of traffic noise onto adjacent noise-sensitive land uses (e.g., residences, schools, medical facilities).

Policy N-1.2: Ensure the inclusion of noise mitigation measures in the design of new roadway projects in Manhattan Beach.

Policy N-1.3: Reduce transportation noise through proper design and coordination of vehicle routing

Policy N-1.4: Ensure the effective enforcement of City, state, and Federal noise levels by all appropriate City divisions.

Policy N-1.5: Work with appropriate agencies to mitigate impacts from existing and proposed aviation operations.

Policy N-1.6: Work with surrounding jurisdictions and other agencies to mitigate noise impacts.

Goal N-2: Incorporate noise considerations into land use planning decisions.

Policy N-2.1: Establish acceptable limits of noise for various land uses throughout the community.

Policy N-2.2: Ensure acceptable noise levels near residences, schools, medical facilities, and other noise-sensitive areas.

Policy N-2.3: Establish standards for all types of noise not already governed by local ordinances or preempted by State or Federal law.

Policy N-2.4: Encourage acoustical design in new construction.

Policy N-2.5: Require that the potential for noise be considered when approving new development to reduce the possibility of adverse effects related to noise generated by new development, as well as impacts from surrounding noise generators on the new development.

Policy N-2.6: Work with businesses in surrounding jurisdictions to manage noise impacts on City residents and businesses.

Goal N-3: Minimize the impact of non-transportation noise sources.

Policy N-3.1: Monitor and update the Noise Ordinance (Chapter 5.48, Noise Regulation) to mitigate noise conflicts.

Policy N-3.2: Enforce the Noise Ordinance.

Policy N-3.3: Minimize impacts associated with single-event noise activities.

Policy N-3.4: Recognize in the Noise Ordinance that nighttime noise levels create a greater sensitivity than do daytime noise levels.

Policy N-3.5: Encourage jurisdictions, including cities, and other agencies to require compliance with the City of Manhattan Beach Noise Ordinance where activities affect Manhattan Beach residents and businesses.

Policy N-3.6: Monitor and minimize noise impacts associated with construction activities on residential neighborhoods.

### Manhattan Beach Municipal Code

#### Chapter 5.48, Noise Regulations

The purview of Chapter 5.48 is to maintain and preserve the quiet atmosphere of the City, to implement programs aimed at retaining ambient noise levels, and to mitigate noise conflicts. This includes establishing interior and exterior noise standards, establishing appropriate hours for noise generating activities, and establishing criteria for the issuance of noise permits.

Section 9.44.030, Construction hours and prohibited days.

As part of Chapter 9.44, Construction Rules, this section dictates that construction activity shall occur only between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. to 6:00 p.m. on Saturdays. Section 9.44.030 also prohibits construction activities on Sundays and on City recognized holidays.

### 3.13.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE</b> – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) ***Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

**Less Than Significant Impact.** Development pursuant to the HEU has minimal potential to expose residents to noise levels in excess of regulatory standards. The General Plan recognizes that vehicular traffic represents the primary undesirable noise source in the City (City of Manhattan Beach 2003a). Any future development facilitated by the HEU adoption would be required to comply with regulations set forth by the MBMC (Chapter 5.48, Noise Regulations), the General Plan Noise Element goals and policies, and all other applicable State and federal regulatory requirements. Construction would be subject to additional requirements set forth in Chapter 9.44, Construction Rules, of the MBMC including limiting construction hours to between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. to 6:00 p.m. on Saturdays and prohibiting construction on certain holidays. Any future development project(s), including the future rezoning effort, would be required to undergo the appropriate level of CEQA review, which would take into consideration impacts related transportation, including any transportation noise impacts. Other provisions related to traffic noise have been incorporated into the Design Overlay District policies. The City has established eight Design Overlay Districts which establish development standards specific to the unique needs of each Overlay District. For example, in Overlay Districts D1 and D4, where traffic related noise is of particular concern, higher fences are permitted to mitigate traffic noise impacts. Policies such as this could help to mitigate any future transportation noise impacts resulting from future development.

The HEU is a policy document, outlining the framework for the City’s housing program; no actual development is proposed as part of the HEU. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City’s 6<sup>th</sup> Cycle RHNA allocation. The majority of such development is expected to be located on infill sites. Adherence to the City’s Noise Ordinance and compliance with General Plan Noise Element polices would ensure that any increases in noise levels, both temporary and permanent, would result in less than significant impacts; as such, no mitigation is required.



**b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

**Less Than Significant Impact.** Residential uses typically do not generate excessive groundborne vibration or groundborne noise levels. However, demolition and construction associated with new housing could result in impacts related to groundborne vibration or groundborne noise levels. For example, demolition and construction activities could generate vibration through the use of drills, jackhammers, pile drivers, operation of compressors and generators, cement mixing, and general truck idling. However, the City has policies that would ensure that groundborne vibrations and groundborne noise levels were minimized. Per the City’s Community Development Department, activities that have the potential to cause significant groundborne vibrations—including pile drivers/hammer/vibration installation methods, and/or pile extraction—are not permitted unless specifically pre-approved by the City’s Building Official (City of Manhattan Beach 2020). In addition, Policy N-3.6 requires that a project monitor and minimize noise impacts associated with construction activities in residential neighborhoods, while Section 10.60.120 of the MBMC dictates that no use, activity, or process can produce vibrations that are perceptible at the property lines of a site.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City’s 6th Cycle RHNA allocation. The majority of such development is expected to be located on infill sites and away from vibration sensitive low-density residential areas. Adherence to Chapters 5.48 and 9.44 of the MBMC and compliance with General Plan Noise Element polices would ensure that any noise vibration increases, both temporary and permanent, would result in less than significant impacts within the City; as such, no mitigation is required.

**c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

**No Impact.** Manhattan Beach is not located within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The Los Angeles International Airport, located approximately four miles to the north, is identified as a stationary noise source impacting residents in the City (Manhattan Beach 2003a, 2003b). However, associated noise levels are generally not considered excessive and usually do not impact daily activities in the City (City of Manhattan Beach 2003b). As such, the HEU will have no impact as it relates to airports and noise.

### 3.13.4 References

City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29,2021.

City of Manhattan Beach. 2020. Shoring Requirements Community Development Requirements. <https://www.manhattanbeach.gov/home/showpublisheddocument/220/637581428309330000>. Accessed November 22, 2021.

ICC (International Code Council). 2019. California Building Code. Accessed October 1, 2021. <https://codes.iccsafe.org/content/chapter/15426/>.

OPR (State of California Office of Planning and Research). 2017. State Planning Guidelines.

## 3.14 Population and Housing

### 3.14.1 Environmental Setting

#### Population

Manhattan Beach had a population of 35,058 residents in 2021. Manhattan Beach grew very slowly during the 2000s, having grown less than 4% from 2000 to 2010 (City of Manhattan Beach 2021). Most of the growth that has recently occurred has consisted of density increases on existing parcels through demolition and replacement of existing homes. From 2010 to 2021, the City's population remained stable, but with a slight decrease by about 0.22%. This is in contrast with the County, which grew by 3.14% between 2000 and 2010, and an additional 2.3% from 2010 to 2021 (City of Manhattan Beach 2021). As an essentially built-out city, there continues to be few opportunities for growth, except through redevelopment/infill on existing parcels.

#### Housing

According to the California Department of Finance's Population and Housing estimates, there were 15,043 housing units in Manhattan Beach in 2021, an increase of approximately 5% from 2012 (City of Manhattan Beach 2021). Of the total housing stock in 2020, the majority, or 77%, were single-family detached units, and 23% were multifamily units. Mobile homes comprised the remaining 0.1%. From 2012 to 2021, the City had an increase of 111 single-family units and a decrease of 24 multi-family units due to the replacement of existing duplexes with single-family residential structures that include at least one accessory dwelling unit.

#### Employment

Housing needs are influenced by employment characteristics. Significant employment opportunities within a city can increase demand for housing in proximity to jobs. Manhattan Beach has 17,006 workers living within its borders (City of Manhattan Beach 2021). In 2019, the largest industry to employ residents of Manhattan Beach was the Management, Business, Science, and Arts occupations industries, accounting for 69.8% of the labor force (City of Manhattan Beach 2021). Employment is an important factor affecting housing needs within a community. The jobs available in each employment sector and the wages for these jobs affect the type and size of housing residents can afford, and as such, employment and projected job growth have a significant influence on housing needs during the HEU's 6<sup>th</sup> Cycle planning period (2021-2029).

## Jobs/Housing Balance

A jobs/housing balance is a ratio that indicates the number of available jobs in the City compared to the number of available housing units. The ratio is one potential indicator of a community's ability to reduce commuter traffic and overall vehicle miles traveled (VMT) by maintaining a balance between employment and housing in close proximity (e.g., within the City limits). SCAG uses the jobs-housing balance as a general tool for analyzing where people work, where they live, and how efficiently they can travel between the two. The jobs-housing balance for the City would divide the reported 2018 jobs number (16,138) by the reported 2019 housing stock number (13,427) (City of Manhattan Beach 2021), resulting in an existing jobs-housing balance of 1.2. As a comparison, Los Angeles County as a whole has an average job-housing balance of 1.43. Per the Los Angeles County General Plan, one of the most cited studies of jobs-housing balance recommends 1.3 to 1.7 as the range for an ideal jobs-housing balance (County of Los Angeles 2014, Ewing 1996). As such, the City can be considered to have a slightly less than ideal jobs/housing ratio.

### 3.14.2 Regulatory Setting

#### Federal

There are no applicable federal policies or regulations related to housing and population.

#### State

Government Code Section 65580 et seq.

Government Code Article 10.6. Housing Elements, Section 65580, declares that the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order. Governments and private sectors should work cooperatively to expand housing opportunities and accommodate housing needs in California. Furthermore, designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the State's housing goals and the purposes of this article.

#### Regional

##### Regional Growth Management Policies: Southern California Association of Governments

SCAG is recognized by the state and federal governments as the regional planning agency for the six-county south coast region that includes Los Angeles County. In 2004, SCAG adopted a voluntary regional growth strategy known as the Compass Blueprint. SCAG's Compass Blueprint is an advisory or voluntary plan that promotes mixed-use development, better access to jobs, conservation of open space, public/private partnerships, and user-fee infrastructure financing, improving the capacity and efficiency of movement of goods, reducing vehicle miles traveled, improving air quality, improving housing availability and affordability, renovating urban cores, and creating over 500,000 high-paying jobs.

## Regional Transportation Plan/Sustainable Communities Strategy

In 2020, the Regional Council of SCAG adopted the 2020–2045 RTP/SCS to increase mobility for the region’s residents and visitors (SCAG 2020). Furthermore, the 2020–2045 RTP/SCS commits to reducing emissions from transportation sources to comply with SB 375, improving public health, and meeting the National Ambient Air Quality Standards. The SCS envisions combining transportation and land use elements in order to achieve emissions reduction targets set by the California Air Resources Board (SCAG 2020). The 2020–2045 RTP/SCS includes population, jobs, and housing forecasts up to 2045.

## Regional Housing Needs Allocation

The SCAG Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) on September 3, 2020. As part of Connect SoCal, SCAG assigns a number of housing units that the City is required to plan for in the eight-year Housing Element cycle. That number of units is called the Regional Housing Needs Allocation (RHNA), and it is broken down by income category, ensuring that all economic groups are accommodated.

The City’s existing inventory of residential sites is insufficient to accommodate the 774 units in its RHNA for 2021-2029, which includes 487 lower-income units, 155 moderate-income units, and 132 above moderate-income units (SCAG 2021). As such, as part of the HEU, the City proposes a rezoning program to accommodate its RHNA gap. While potential sites have been identified as part of the HEU’s sites analysis, the precise locations and parcels are still to be determined and will need to undergo further review. The City will refine and implement the rezoning program over a three year and 120 day planning horizon, as provided by Government Code Section 65583(c)(1)(A). The 6<sup>th</sup> Cycle RHNA allocation plans for a total housing production need of 774 units for the City.

## City of Manhattan Beach Housing Element

The Housing Element is one of seven mandatory elements of the City’s General Plan. The Housing Element provides an overview of demographics, household, housing stock, economic, and regulatory factors affecting housing development and affordability within the City. The Housing Element sets forth a series of goals and implementing policies to address a variety of housing issues, including identifying vacant and underutilized sites to accommodate the City’s 6<sup>th</sup> Cycle RHNA allocation, discussed above. The HEU is an update to the Housing Element for the 6<sup>th</sup> Cycle RHNA.

### 3.14.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

**Less Than Significant Impact.** Implementation of the programs contained in the HEU would help to accommodate development required to meet the City’s 2021–2029 6<sup>th</sup> Cycle RHNA allocation. Under the RHNA allocation, the City is required to provide the zoned capacity to accommodate the development of at least 774 units using various land use planning strategies. It has been determined that the City’s inventory of residential sites will be insufficient to accommodate future housing needs, resulting in a deficiency of 406 lower-income units. As such the HEU identifies a rezoning program in the HEU to accommodate its RHNA gap. While the HEU consists of a policy document update, which is not anticipated to produce environmental impacts, the rezoning program as part of the HEU would allow for greater densities than currently allowed within the City’s PD and CG zones and will be further evaluated when the parcels to be rezoned are fully identified.

While the HEU does not propose development at this time, the HEU would facilitate additional population growth through the provision of housing within the City. However, the HEU does not require new construction or expansion of existing roadway infrastructure (e.g., new roads) as all identified sites would be located on underutilized infill development sites. Additionally, according to the HEU, methodologies utilized to identify general areas where the rezoning program may be implemented took into account accessibility to existing infrastructure and utilities. Further, all existing sites identified in the HEU as having the potential to accommodate future residential development are in areas appropriately zoned to support such development and the accompanying increase in population, which was planned and accounted for in existing General Plan. Further, any future rezoning efforts facilitated as a result of HEU implementation would be required to undergo the appropriate level of programmatic review, as required by CEQA, which would take into consideration the direct and indirect impacts related to population and would incorporate

any necessary program specific mitigation measures to reduce or eliminate any potentially significant impacts. Therefore, the HEU is not expected to result in extension of roads or infrastructure.

The HEU would be aligned with the dwelling unit needs and increased population as projected SCAG's Connect SoCal, the 2020–2045 RTP/SCS. Additionally, approval of the HEU in and of itself, as a policy document update, would not change these forecasts and would not provide any goals, policies, or programs that would significantly increase the dwelling unit and population projections by SCAG. Therefore, the HEU would not induce unplanned substantial population growth. Impacts regarding population and housing would be less than significant, and no mitigation is required.

**b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

**Less Than Significant Impact.** As described in Threshold 3.13(a), while the HEU consists of a policy document update that is not anticipated to produce environmental impacts, the rezoning program as part of the HEU would allow for greater densities than are currently allowed within the City. However, the rezoning program would not displace a substantial number of existing people or housing; rather, it would facilitate an increase in housing supply, as discussed above, on underutilized infill sites throughout the City. Therefore, implementation of the proposed HEU would have a less-than-significant impact, and no mitigation is required.

### 3.14.4 References

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2021. Housing Element Update.

LAC (County of Los Angeles). 2014. County of Los Angeles 2035 General Plan. Accessed October 3, 2021. [https://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_deir.pdf](https://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf).

Ewing, Reid. 1996. Best Development Practices: Doing the Right Thing and Making Money at the Same Time. Chicago: Planners Press.

SCAG (Southern California Association of Governments). 2021. SCAG RHNA Allocation Plan. Adopted March 2021. Revised July 2021. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899>.

## 3.15 Public Services and Recreation

### 3.15.1 Environmental Setting

#### Fire Department

Manhattan Beach's Fire Department provides fire protection services to the City and has daily suppression staffing typically consists of eight Firefighters/Paramedics, plus one Battalion Chief who operates out of two stations. Emergency response is handled by two engines, a Paramedic rescue ambulance, and the Battalion Chief. Fire Station 1 is located adjacent to City Hall, and Fire Station 2 is Located at 1400 Manhattan Beach Boulevard. The Department responds to emergency incidents within an average time of four minutes and thirty seconds.

#### Police

The Manhattan Beach Police Department provides safety and emergency response services and engages in community programs and educational activities. The Department is also generally able to respond to high priority calls in under two and a half minutes. The response time is within the Department's response time goals.

#### Parks

The City Park system consist of neighborhood parks, community parks, and school grounds for which the City and Manhattan beach Unified School District maintain joint user agreements. The City owns, operates, and maintains eleven parks primarily designed and used for active recreation. Joint-use agreements for use of school grounds and play areas provide residents with additional recreational facilities, particularly athletic fields. The North Porto area, which has no local parks, has immediate access to the beach.

Although Manhattan Beach is well served by parks, overuse has been an increasing issues for residents who live adjacent to parks; however, per the General Plan, the City is actively taking measures to address these concerns.

#### Schools

The Manhattan Beach Unified School District (MBUSD) operates all public schools located in Manhattan Beach. MBUSD operates eight schools, including five elementary schools (K-5), one middle school (6-8), and one high school (9-12). Other facilities include an adult school, transition school site, and several child development centers. In addition to educational services, school facilities provide recreation opportunities for all residents of the City. Schools and parks make up approximately 28% of the City's park and open space.

#### State Beach and the "Strand"

The State Beach and the two-mile Strand provide recreational opportunities to residents of Manhattan Beach and people living throughout the southland. These resources help define Manhattan Beach and contribute significantly to its attractive living environment. Amenities include volleyball courts, biking and walking paths, play areas, and public parking. The County of Los Angeles, Department of Beaches and Harbor manages these improvements. The pier is owned by the State of California and leased to the City of Manhattan Beach.

## 3.15.2 Regulatory Setting

### Federal

#### National Fire Protection Association

The National Fire Protection Association recommends that fire departments respond to fire calls within six minutes of receiving the request for assistance 90% of the time. These time recommendations are based on the demands created by a structural fire. It is crucial to attempt to arrive and intervene at a fire scene prior to the fire spreading beyond the room of origin. Total structural destruction typically starts within eight to 10 minutes after ignition. Response time is generally defined as 1 minute to receive and dispatch the call, one minute to prepare to respond to the fire station or field and four minutes (or less) travel time.

### State

#### California Health and Safety Code (Section 13000 et seq.)

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

#### California Code of Regulations Title 24, Part 2 and Part 9

Part 2 of Title 24 of the California Code of Regulations refers to the California Building Code, which contains complete regulations and general construction building standards of State adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2019 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This code was revised in January 2019 with a change in the base model/consensus code from the Uniform Fire Code series to the International Fire Code.

#### California Public Resources Code, Section 4201-4204

This section of the California Public Resources Code was amended in 1982 to require the California Department of Forestry to classify all State Responsibility Areas (SRAs) into fire hazard severity zones. The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be used to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

#### California Government Code 66000

According to California Government Code 66000, a qualified agency, such as a local school district, may impose fees on developers to compensate for the impact that a project will have on existing facilities or services. The State



of California legislature passed Senate Bill (SB) 50 in 1998, which inserted new language into the Government Code (Sections 65995.5-65995.7), which authorized school districts to impose fees on developers of new residential construction in excess of mitigation fees authorized by Government Code 66000. School districts must meet a list of specific criteria, including the completion and annual update of a School Facility Needs Analysis, in order to be legally able to impose the additional fees.

### California Government Code Section 65995

California Government Code Section 65995 (the Leroy F. Green School Facilities Act of 1998) set base limits and additional provisions for school districts to levy fees to help fund expanded facilities to house new pupils that may be generated by development projects. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under the California Environmental Quality Act (CEQA). These fees may be adjusted by the district over time as conditions change.

### Government Code Section 66477

The Quimby Act (Government Code Section 66477), enacted in 1975, creates a framework that allows cities and counties to provide parks for growing communities. The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements.

### 2019 California Fire Code

The California Fire Code (24 CCR Part 9) establishes regulations to safeguard life and property against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The Fire Code includes regulations regarding fire-resistance-rate construction, fire protection systems such as alarm and sprinkler systems, fire service features such as fire apparatus access roads, means of egress fire safety during construction and demolition, and wildland-urban interface areas.

## Local

### Manhattan Beach Municipal Code

#### Section 1.20.070, Public facilities

The City may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries or other public uses subject to the provisions of Section 66479 of the Subdivision Map Act.

### Section 11.20.100 Park and recreation dedications and fees

As a condition of approval of a tentative map, the subdivider/applicant must dedicate land, pay a fee in lieu thereof, or a combination of both, at the option of the City, for park and recreational purposes at the time and according to the standards and formulas contained Chapter 11.20, Dedications, of the MBMC.

### Section 3.16.010 - Adoption of 2019 California Fire Code.

This section adopts the 2019 Edition of the California Fire Code, by reference, as the official Fire Prevention Code of the City of Manhattan Beach, including Appendices B, C, and O, and as amended by Section 3.16.020, Fire Code Amendments.

### City of Manhattan Beach General Plan

The following goals and policies within the City's General Plan pertain to public services:

Goal CR-1: Maintain a park, recreation, and open space system that provides a variety of recreational opportunities accessible to all residents and meets the needs of all residents.

Policy CR-1.1: Promote the acquisition of properties for the purpose of conversion to parks and open space areas to meet the needs of City residents.

Policy CR-1.2: Encourage the development of quality commercial recreation facilities on both privately held and City owned land under long-term lease or concession agreements.

Policy CR-1.3: Acquire properties that are subject to flooding during heavy storms for the purpose of converting them to open space and park facilities, when feasible to do so.

Policy CR-1.5: Accept and actively seek out the donation of private residential properties for the development of strategically located pocket parks and similar open space.

Goal CR-3: Maintain relationships with educational institutions, as they represent a cornerstone of the community

Policy CR-3.1: Work with the Manhattan Beach Unified School District to continue joint-use agreements of City and school district facilities for arts and recreation programs.

Policy CR-3.2: Emphasize crime prevention education in local public and private schools.

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.5: Review the City's emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.7: Support the use of the best available equipment and facilities to ensure safety that meets the changing needs of the community.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Policy CS-3.10: Strive to reduce emergency response time

Goal CS-4: Maintain a high level of police protection services.

Policy CS-4.1: Recognize the importance of calculating the daytime population in determining emergency service needs.

Policy CS-4.2: Support the development and continued updating of public education programs on safety.

Policy CS-4.3: Encourage the formation and continued education of Neighborhood Watch groups to assist the police in crime prevention and detection.

Policy CS-4.4: Work with Los Angeles County Department of Beaches to ensure adequate police protection and emergency services to visitors and residents using the City’s beaches.

Policy CS-4.5: Continue to upgrade the quality of police personnel through continued education, training, and proactive recruiting efforts.

Policy CS-4.6: Support proactive measures to enhance public safety, such as use of increased foot or bicycle police patrols.

Policy CS-4.7: Strive to reduce police response time.

### 3.15.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XV. PUBLIC SERVICES**

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

***Fire protection;***

***Police protection;***

***Parks;***

***Schools; and/or***

***Other public facilities?***

**Less Than Significant Impact.** The City has provisions to mitigate for the impacts of new residential development on public services, including fire and police protection, schools, parks, and other services and utilities. For example, Section 1.20.070 provides that the City may require that areas of real property within a subdivision be reserved for parks, recreational facilities, fire stations, libraries, or other public uses. In addition, fees are charged by the City to defray the cost of providing public services and facilities to new developments, including residential developments accommodated by the proposed HEU. The City also has a requirement to pay water and sewer fees to ensure that these services will be available to serve new developments.

Required developer impact fees for parks are accommodated per the Quimby Act, which authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements. Dedications and in lieu park fees are reinforced in Section 11.20.100 (Park and recreation dedications and fees) of the MBMC. For single-family or condo developments, \$1,817 per dwelling unit is assessed for park purposes in accordance with the MBMC and Quimby Act. School District fees are required to mitigate for the potential addition of school aged children moving into the MBUSD a result of new residential development. The fees paid to the MBUSD for residential development amount to \$3.79 per square foot (City of Manhattan Beach 2021).

The ultimate development facilitated by the adoption of the HEU would be located on infill development parcels throughout the City and would not require any extensions of service areas. The HEU, therefore, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services listed above. This HEU would not change or impact standards, policies, programs, and regulations in place that ensure adequate provision of public services. Based on the above, the HEU would have a less than significant impact related to public services, and no mitigation is required.

## 3.15.4 References

City of Manhattan Beach. 2021. Developer Impact Fees Community Development. Accessed October 2, 2021. <https://www.manhattanbeach.gov/home/showdocument?id=42983>.

## 3.16 Recreation

### 3.16.1 Environmental Setting

#### Parks

The City Park system consist of neighborhood parks, community parks, and school grounds for which the City and Manhattan Beach Unified School District maintain joint user agreements. The City owns, operates, and maintains 11 parks primarily designed and used for active recreation. Joint-use agreements for use of school grounds and play areas provide residents with additional recreational facilities, particularly athletic fields. The North El Porto area, which has no local parks, has immediate access to the beach.

Although Manhattan Beach is well served by parks, overuse has been an increasing issue for residents who live adjacent to parks; however, per the General Plan, the City is actively taking measures to address these concerns.

#### State Beach and the “Strand”

The State Beach and the two-mile Strand provide recreational opportunities to residents of Manhattan Beach and people living throughout the southland. These resources help define Manhattan Beach and contribute significantly to its attractive living environment. Amenities include volleyball courts, biking and walking paths, play areas, and public parking. The County of Los Angeles, Department of Beaches and Harbor manages these improvements. The pier is owned by the State of California and leased to the City of Manhattan Beach.

### 3.16.2 Regulatory Setting

#### Federal

There are no federal regulations related to recreation that would apply to the HEU.

#### State

##### Government Code Section 66477

The Quimby Act (Government Code Section 66477), enacted in 1975, creates a framework that allows cities and counties to provide parks for growing communities. The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements.

**Local**

Manhattan Beach Municipal Code

Section 1.20.070, Public facilities

The City may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries or other public uses subject to the provisions of Section 66479 of the Subdivision Map Act.

Section 11.20.100 Park and recreation dedications and fees

As a condition of approval of a tentative map, the subdivider/applicant must dedicate land, pay a fee in lieu thereof, or a combination of both, at the option of the City, for park and recreational purposes at the time and according to the standards and formulas contained Chapter 11.20, Dedications, of the MBMC.

City of Manhattan Beach General Plan

The following goals and policies within the City’s General Plan pertain to public services:

Goal CR-1: Maintain a park, recreation, and open space system that provides a variety of recreational opportunities accessible to all residents and meets the needs of all residents.

Policy CR-1.1: Promote the acquisition of properties for the purpose of conversion to parks and open space areas to meet the needs of City residents.

Policy CR-1.2: Encourage the development of quality commercial recreation facilities on both privately held and City owned land under long-term lease or concession agreements.

Policy CR-1.3: Acquire properties that are subject to flooding during heavy storms for the purpose of converting them to open space and park facilities, when feasible to do so.

Policy CR-1.5: Accept and actively seek out the donation of private residential properties for the development of strategically located pocket parks and similar open space.

### 3.16.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

**Less Than Significant Impact.** While the HEU has the potential to accommodate a higher capacity of housing (resulting in a relative increase in permanent residents placing demands upon existing recreational facilities), the City has provisions to mitigate for the impacts of new residential development on recreational services. For example, Section 1.20.070 provides that the City may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries, or other public uses. In addition, fees are charged by the City to defray the cost of providing recreational facilities to new developments, including residential developments accommodated by the proposed HEU. Required developer impact fees for parks are required by the City per the Quimby Act, which authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions (City of Manhattan beach 2021). The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements. Dedications and in lieu park fees are reinforced in Section 11.20.100 (Park and recreation dedications and fees) of the MBMC.

The HEU is a policy document, and adoption of the HEU alone would not produce environmental impacts. The HEU consists of an updated housing program for which no actual development is proposed. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, the HEU, would not result in an increase use of existing neighborhood and regional parks or other recreational facilities such that there are substantial physical deterioration of the facility. This HEU would not change or impact standards, policies, programs, and regulations in place that ensure adequate provision of recreational services and facilities. Based on the above, the HEU would have a less than significant impact, and no mitigation is required.

**b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?***

**No Impact.** As discussed above in Threshold 3.16(a), the City has provisions to mitigate for the impacts of new residential development on recreational facilities, including Section 1.20.070, requiring that areas within a subdivision be reserved for parks, recreational facilities, or other public uses. In addition, per the Quimby Act, the City requires developers to pay impact fees to offset the impacts of an increase in new permanent residents. Dedications and in lieu park fees are reinforced in Section 11.20.100 (Park and

recreation dedications and fees) of the MBMC. For single-family or condo developments, \$1,817 per dwelling unit is assessed for park purposes in accordance with the MBMC and Quimby Act. Ultimately, the HEU involves the adoption of the HEU, which is a policy document would not, in and of itself, result in environmental impacts or result in the need for new or expanded recreational facilities. As such, no impacts to recreational facilities would occur.

### 3.16.4 References

City of Manhattan Beach. 2021. Developer Impact Fees Community Development. Accessed October 2, 2021. <https://www.manhattanbeach.gov/home/showdocument?id=42983>.

## 3.17 Transportation

### 3.17.1 Environmental Setting

CEQA Section 15064.3(a) established vehicle miles travelled (VMT) as the most appropriate measure of transportation impacts. The subdivision (a) defines VMT as “the amount and distance of automobile travel attributable to a project.” The term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. For land use projects and plans, such as the HEU, based on the predominant use, the following VMT efficiency metrics and method of estimation can be used:

- Total VMT per Service Population: The total VMT to and from all zones in the geographic area are divided by the total service population to get the efficiency metric of VMT per service population. The total service population is the sum of the number residents and the number of employees.
- Residential (Home-based) VMT per capita: All home-based auto vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the population within the geographic area to get the efficiency metric of home-based VMT per capita (or per resident).
- Employment (Home-based work) VMT per employee: All auto vehicle trips between home and work are counted, and then divided by the number of employees within the geographic area to get the efficiency metric of home-based work VMT per employee.

According to the County of Los Angeles modelled VMT by City (2016) the City of Manhattan Beach has an average per capita VMT of 24.27 (per person per year) (County of Los Angeles 2021).

The City is within the County’s South Bay Planning Area for regional transportation. This area is served by portions of Interstate 405 (I-405), Interstate 110 (I-110), Interstate 105 (I-105), State Route 91 (SR 91), and State Route 47 (SR 47). The main north-south highways include Vermont Avenue, Hawthorne Boulevard (SR-107), and La Cienega Boulevard. East-west highways and secondary highways include Torrance Boulevard, Manhattan Beach Boulevard, and Sepulveda Boulevard. As previously discussed, Sepulveda Boulevard is the only State Highway in Manhattan Beach. As a major transportation corridor for the South Bay region, Sepulveda Boulevard also functions as a commercial corridor for the City and supports heavy traffic volumes.



## 3.17.2 Regulatory Setting

### Federal

There are no applicable federal regulations related to transportation that would apply to the HEU.

### State

#### Senate Bill 743

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline review under the CEQA process for several categories of development projects, including the development of infill projects in transit priority areas, and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit Oriented Infill Projects, to the CEQA Statute (California Public Resources Code, Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of level of service (LOS) in CEQA documents.

In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity such as widening a roadway or the size of an intersection, which in turn induces more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative modes of transportation such as biking, walking, and transit. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop an alternative metric(s) for analyzing transportation impacts in CEQA documents. The alternative shall promote the state's goals of reducing GHG emissions and traffic-related air pollution by promoting the development of a multimodal transportation system and providing clean, efficient access to destinations. Under SB 743, it was anticipated that the focus of transportation analysis would shift from vehicle delay (and LOS) to VMT within transit-priority areas (i.e., areas well served by transit).

Pursuant to SB 743, OPR released the draft revised CEQA Guidelines in November 2017, recommending the use of VMT for analyzing transportation impacts. Additionally, OPR released updates to the Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdictions. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance...recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence" (CEQA Guidelines Section 15064.7[c]).

#### Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act; SB 375) supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, the California Air

Resources Board sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, the California Air Resources Board established targets for 2020 and 2035 for each region covered by one of the state's Metropolitan Planning Organizations (MPOs). The California Air Resources Board will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its Regional Transportation Plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. California Air Resources Board must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy to meet the targets. The alternative planning strategy is not a part of the RTP.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the alternative planning strategy. Developers can get relief from certain CEQA requirements if their new residential and mixed-use projects are consistent with a region's SCS (or alternative planning strategy) that meets the targets (see California Public Resources Code, Sections 21155, 21155.1, 21155.2, 21159.28).

### Statewide Transportation Improvement Program

The California 2010 Statewide Transportation Improvement Program, approved by the U.S. Department of Transportation in October 2009, is a multi-year, Statewide, intermodal program of transportation projects that is consistent with the statewide transportation plan and planning processes, metropolitan plans, and Title 23 of the Code of Federal Regulations. The Statewide Transportation Improvement Program is prepared by Caltrans in cooperation with the MPOs and the regional transportation planning agencies. The Statewide Transportation Improvement Program contains all capital and noncapital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and Title 23 of the Code of Federal Regulations, including federally funded projects.

### The California Department of Transportation

As the owner and operator of the state highway system, Caltrans implements established state planning priorities in all functional plans, programs, and activities. Caltrans coordinates and consults with local jurisdictions when proposed local land use planning and development may impact State highway facilities. Pursuant to Section 21092.4 of the California Public Resources Code, for projects of Statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities that could be affected by the HEU.

Caltrans Draft Transportation Impact Study Guide and Safety Review (Caltrans 2020) replaced the Guide for the Preparation of Traffic Impact Studies (Caltrans 2002). Per the 2020 Transportation Impact Study Guide, Caltrans' primary review focus is VMT, replacing LOS as the metric used in CEQA transportation analyses (Caltrans 2020). Caltrans recommends use of OPR's recommended thresholds and guidance on methods of VMT assessment found in OPR's Technical Advisory (OPR 2018) for land use projects. In addition to VMT, the 2020 Transportation Impact Study Guide states that it may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the state highway system and connections with the state highway system.

## Local/Regional

### Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

SCAG develops the RTP, which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura counties. SB 375 was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, SCAG is tasked with developing an SCS, an element of the RTP that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board. The SCS outlines the plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

The 2016 RTP/SCS identifies priorities for transportation planning within the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area (SCAG 2016). The Regional Transportation Improvement Programs, also prepared by SCAG based on the RTP, lists all of the regional funded/programmed improvements within the next 5 to 7 years. To qualify for CEQA streamlining benefits under SB 375, a project must be consistent with the RTP/SCS.

The 2020–2045 RTP/SCS, also known as Connect SoCal, is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020). The SCAG Regional Council adopted Connect SoCal on September 3, 2020.

For SCAG member jurisdictions, the 6<sup>th</sup> Cycle Housing Element planning period extends from 2021 to 2029. As part of Connect SoCal, SCAG assigns a number of housing units that the County is required to plan for in the eight -year Housing Element cycle. That number of units is called the Regional Housing Needs Assessment (RHNA), and it is broken down by income category, ensuring that all economic groups are accommodated. If a jurisdiction cannot show that there are enough sites to address the housing need, the jurisdiction is required to develop a rezoning program. The rezoning ensures that there are enough sites with sufficient densities to address the housing need identified through the RHNA.

### Los Angeles County Metropolitan Transportation Authority

Metro is the county-level transportation planning and public transportation operating agency that was created by the State of California to set policy, coordinate, plan, fund, build, and operate transit services and transportation programs throughout Los Angeles County. Metro supports the transportation improvement programs of the 88 cities and 16 municipal transit operators within the County, as well as Los Angeles's paratransit provider, Access Services, and its regional commuter rail service provider, Metrolink. Metro is also responsible for the preparation of the Long-

Range Transportation Plan and the Short-Range Transportation Plan (SRTP). The current Long- and Short-Range Transportation Plans are the 2020 Long-Range Transportation Plan and the 2014 Short-Range Transportation Plan. The transportation plans include all major transit and highway projects (partially or fully funded), existing programs and policies, and new policies and initiatives required to achieve Metro’s regional goals.

### Congestion Management Plan

The Congestion Management Plan (CMP) is a program adopted by the State Legislature and approved by the State voters in 1990 through Proposition 111. The CMP was created for the following purposes:

- To link land use, transportation, and air quality decisions;
- To develop a partnership among transportation decisionmakers on devising appropriate transportation solutions that include all modes of travel; and
- To propose transportation projects which are eligible to compete for state gas tax funds.

The Los Angeles County Metropolitan Transportation Authority (MTA) is responsible for preparing the County’s CMP. The MTA is required by State law to monitor local implementation of all CMP elements. Local jurisdictions are required to monitor arterial congestion levels, monitor transit services along certain corridors, and implement an adopted trip reduction Refer to the Circulation section of the Infrastructure Element ordinance and land use analysis program. In addition, a key CMP component is the deficiency plan through which jurisdictions track and report their local development activity as “debits” and transportation improvements as “credits.” Jurisdictions must maintain an annual positive balance of credits over debits to be in conformance with the CMP.

### Los Angeles County Measures R and M

Measures R and M are half cent sales tax measures for Los Angeles County to finance new transportation projects and programs and accelerates many of those already in the pipeline – everything from new rail and/or bus rapid transit projects, commuter rail improvements, The Los Angeles County Metropolitan Transit Authority rail system improvements, highway projects, improved countywide and local bus operations, and local city sponsored transportation improvements. Measure R and Measure M were approved by the minimum two-thirds vote in the November 2008 election and November 2016 election, respectively. The highway, bus and rail projects identified in the Measures respective expenditure plans are spread throughout Los Angeles County. In addition, each of the individual cities and unincorporated areas within Los Angeles County will receive a share of the revenue to use at their discretion for local transportation needs. There are three Metro funded transit projects in the South Bay region; the Crenshaw/LAX Transit Corridor Project, the Airport Metro Connector 96th Street Transit Station, and the South Bay Green Line Extension. The South Bay Cities Council of Governments (SBCCOG) administers a sub fund to improve local and regional highways including those that serve Manhattan Beach.

### City of Manhattan Beach General Plan

The General Plan “Mobility Plan” for the City of Manhattan Beach seeks provide for a balanced, multi-modal transportation system for the movement of people and goods within, to and from the City. In keeping with State and Federal laws and regulations, the Mobility Plan states that a balanced system is required, and that it must meet the needs of all users including motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods and users of public transportation. The Mobility Plan places an emphasis on non-motorized modes of transportation (bicycling and walking) as well as implementing streets that serve the mobility of all users

by providing high quality pedestrian, bicycling, and transit access to all destinations throughout the City, as appropriate, and design streets to be inviting places for all users, with beauty and amenities.

Pursuant to the SCAG's RTS/SCS, "mobility" refers to the movement of people, goods, and resources within or beyond a city or region.

The following goals and policies from the Mobility plan would apply to the HEU.

Goal I-1: Provide a balanced, safe, and efficient multi-modal transportation system that serves the mobility needs of all community members, including children, seniors, and the disabled.

Policy I-1.1: Review the safety and functioning of the street system on a regular basis to identify problems and develop solutions.

Policy I-1.2: Improve street signage citywide, to enhance safety, visibility, and ensure street signs are not obstructed.

Policy I-1.3: Encourage the development of Transportation Demand Management (TDM) plans for all major developments or facility expansions to encourage ride-sharing and other improvements, thereby reducing vehicle trips.

Policy I-1.4: Work with neighboring communities, other South Bay cities, the state and other agencies to develop regional solutions to transportation problems that are regional in nature, and to mitigate impacts of development in neighboring communities that impact the City.

Policy I-1.5: Support Dial-A-Ride or other para-transit systems for the senior and disabled members of the community.

Policy I-1.6: Require property owners, at the time of new construction or substantial remodeling to dedicate land for public improvements such as roadways, wider sidewalks and/or bicycle lanes, as appropriate and warranted by the project.

Policy I-1.7: Improve multi-modal connections to transit facilities, especially to the Metro Green Line stations.

Policy I-1.8: Improve multi-modal connections between the portions of the City east and west of Sepulveda Boulevard.

Policy I-1.9: Consider implementing a development impact fee program to collect funds from developers constructing new projects. Such fees would fund "fair-share" costs of mobility improvement projects required to mitigate project impacts.

Policy I-1.10: Promote car-sharing and neighborhood electric vehicles as important means to reduce traffic congestion and further promote climate action projects.

Policy I-1.11: Allow for flexible use of public rights-of-way to accommodate all users, while maintaining safety standards.

Policy I-1.12: Integrate the financing, design and construction of pedestrian facilities and improvements with street projects where feasible at the same time as improvements for vehicular circulation.

Goal I-2: Move commuter traffic through the City primarily on arterial streets and collector streets, as appropriate, to protect other streets from the intrusion of cut-through traffic.

Policy I-2.1: Utilize the Neighborhood Traffic Management Program (NTMP) tools to mitigate neighborhood intrusion by cut-through traffic and improve conditions for pedestrians and bicyclists.

Policy I-2.2: Monitor all major intersections and arterial streets and pursue capital projects as needed to minimize traffic diversion into local streets, improve pedestrian and bicycle conditions to keep traffic moving efficiently.

Policy I-2.3: Minimize vehicular access for new developments on local residential streets, and in locations with high pedestrian and bicycle activity, and design access and egress to avoid traffic intrusion on local streets to the maximum extent possible.

Policy I-2.4: Require property owners, at the time new construction is proposed, to either improve abutting public right-of-way to its full required width per the street master plan or to pay in-lieu fees for improvements, as appropriate.

Policy I-2.5: Encourage the use of Intelligent Transportation Systems (ITS), such as advanced traffic signalization, motorist information, advanced transit, advanced emergency vehicle access, and intelligent parking systems, as well as other appropriate communication technologies, to efficiently and safely move traffic.

Policy I-2.6: Review on-street parking in neighborhoods adjacent to commercial areas where neighbors request such review and develop parking and traffic solutions for those neighborhoods adversely impacted by spillover parking and traffic.

Policy I-2.7: Monitor and minimize traffic, parking and truck loading issues associated with construction activities.

Policy I-2.8: Carefully review commercial development proposals with regard to parking, loading and planned ingress/egress, and enforce restrictions as approved. Policy I-2.9: Comprehensively review downtown merchant and other parking permits including valet parking to ensure effective utilization of existing parking capacity.

Policy I-2.10: Protect and enhance on-street public parking including identifying appropriate motorcycle, small car, electric vehicle and bike corral parking opportunities.

Policy I-2.11: Develop a new multi-modal level of service methodology that includes:

- Emphasis on pedestrian and bicycle access and circulation
- Support for reduced vehicle miles traveled
- Maintenance of appropriate emergency vehicle access and response time

Goal I-3: Ensure adequate parking and loading facilities are available to support both residential and commercial needs while reducing adverse parking and traffic impacts.

Policy I-3.1: Periodically review existing Downtown and North Manhattan Beach parking and loading needs and implement solutions as needed to address deficiencies.

Policy I-3.2: Periodically evaluate the adequacy of parking codes in light of land use and parking demand to ensure rightsized parking facilities are provided.

Policy I-3.3: Review development proposals to ensure potential adverse parking impacts are minimized or avoided, and pedestrian and bicycle circulation are not negatively impacted.

Policy I-3.4: Encourage joint-use and off-site parking where appropriate and develop procedures and templates for use in shared parking arrangements.

Policy I-3.5: Require private development to provide public on street parking in the public right-of-way according to Public Works standards in compliance with the street master plan.

Policy I-3.6: Consider emergency vehicle access needs when developing on-street parking and other public right-of-way development standards.

Policy I-3.7: Work to preserve on-street parking within beach areas.

Policy I-3.8: Encourage the school district and private schools to promote active modes of transportation for students and employees as a means of reducing peak-hour traffic.

Policy I-3.9: Work with the school district and private schools to improve pedestrian and bicycle routing and safety around schools. Focus pedestrian access to the elementary schools and bicycle and pedestrian access to the middle and high schools.

Policy I-3.10: Discourage parking associated with schools, particularly at Mira Costa High School, within surrounding neighborhoods.

Policy I-3.11: Work with the school district and private schools to address high traffic volumes during the morning and afternoon peak school hours and improve drop-off and pick-up circulation.

Policy I-3.12: Continue to support and enhance Safe Routes to School programs such as Walking School Bus, walk audits, classroom safety instruction and promotional events

### 3.17.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION – Would the project:</b>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

**Less Than Significant Impact.** Future development associated with implementation of the HEU would be expected to generate more multi-modal trips than conventional development. In addition, the HEU is required to be in compliance with the Mobility Plan of the General Plan, which has goals and policies such as providing a balanced, safe, and efficient multi-modal transportation system; routing commuter traffic primarily on arterial and collector streets, as appropriate, to protect other streets from the intrusion of cut-through traffic; and ensuring that adequate parking and loading facilities are available to support both residential and commercial needs while reducing adverse parking and traffic impacts.

The HEU identifies that the City has the existing capacity to accommodate 377 new residential dwelling units. Through a future rezoning program, capacity for an additional 479 units would be identified. The rezoning effort will include the evaluation of potential traffic impacts related to increased transportation system demands associated with specific future residential projects, and mitigation measures would be adopted as necessary, in conformance with CEQA to address these larger scale Citywide impacts. The HEU in and of itself would not conflict with adopted policies, plans, or programs supporting alternative transportation.

Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. As such, the HEU would result in a less than significant impact on transportation, and no mitigation is required.



b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

**Less Than Significant Impact.** and of Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. Potential traffic impacts related to increased transportation system demands associated with specific future residential projects would be assessed at the programmatic level at such a time that the rezoning program is being considered, consistent with local and state guidelines. Mitigation measures would be adopted as necessary, in conformance with CEQA. Future development projects implemented following the adoption of the rezoning program would more than likely qualify for streamlining and/or an exemption under CEQA, consistent with State and local laws encouraging the development of housing, especially affordable housing, on infill sites. Based on the above, the HEU would result in a less than significant impact related to CEQA Guidelines Section 15064.3, and no mitigation is required.

c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

**Less Than Significant Impact.** Potential traffic impacts related to increased transportation system demands associated with specific future residential projects, including the planned rezoning program, would be assessed at the time the projects are actually proposed and would be consistent with local and state guidelines. Mitigation measures would be adopted as necessary, in conformance with CEQA. The HEU as a policy document would not increase hazards due to design features or incompatible uses.

Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. As such, the HEU would result in a less than significant impact on transportation, and no mitigation is required.

d) *Would the project result in inadequate emergency access?*

**Less Than Significant Impact.** The City's General Plan contains specific goals and polices to maintain effective and high-quality emergency response services for the community, including cooperating with other South Bay jurisdictions to maintain an up-to-date regional emergency response system; disseminating information to residents, businesses, and schools on preparing for and responding to natural disasters; and ensuring that all street signs and street numbers are visible and legible to minimize emergency response time.

Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. As such, the HEU would result in a less than significant impact on transportation, and no mitigation is required.

## 3.17.4 References

Caltrans. 2020. Transportation Impact Study Guide, Vehicle Miles Traveled-Focused. Accessed November 1, 2021. <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

County of Los Angeles. 2021. A County VMT (Total and Per Capita) by City (2016). Accessed October 5, 2021. <https://data.lacounty.gov/Transportation/LA-County-VMT-Total-and-Per-Capita-by-City-2016-/tb57-43ih>.

SCAG. 2020. Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Accessed March 24, 2021. <https://scag.ca.gov/connect-socal>.

## 3.18 Tribal Cultural Resources

### 3.18.1 Environmental Setting

#### Prehistoric Setting

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions.

#### Ethnographic Setting

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Geiger and Meighan 1976; Harrington 1935; Sparkman 1908; Boscana 1846). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach by recording languages and oral histories within the region (Kroeber 1925). Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of

pre-contact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California. This is a particularly important consideration for studies focused on tribal cultural resources (TCRs), where concepts of “cultural resource” and the importance of traditional cultural places are intended to be interpreted based on the values expressed by present-day Native American representatives and may vary from archaeological values.

## 3.18.2 Regulatory Setting

### Federal

#### National Historic Preservation Act

The National Register of Historic Places (NRHP) is the United States’ official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

The National Park Service’s guidance for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation’s history and heritage. The criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in the National Park Service’s National Register Bulletin, How to Apply the National Register Criteria” as “the ability of a property to convey its significance.” To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity” (NPS 1990). NRHP guidance further asserts that properties be completed at least 50 years ago to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be “exceptionally important” (consideration criteria G) to be considered for listing.

A historic property is defined as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria” (Title 36 Code of Federal Regulations Sections 800.16[i][1]).

## State

### California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that Tribal Cultural Resources (TCRs) must be considered under CEQA and also provided for additional requirements for the lead agency to consult with Native Americans. Public Resources Code Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- Included or determined to be eligible for inclusion on the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence (including the significance of the resource to a California Native American tribe), to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the w land areas under City jurisdiction, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

### Senate Bill 18

The Local and Tribal Intergovernmental Consultation process, commonly known as Senate Bill (SB) 18 was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Section 5097.9 and 5097.995, which defines cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).

SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation.

In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to “allow the protection of cultural places in open space element of the general plan” and amended Civil Code Section 815.3 to add “California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.”

### California Environmental Quality Act

As described further below, the following CEQA Statute and Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) define “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource”; it also defines the circumstances when a project would materially impair the significance of an historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological sites.

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; 14 CCR 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]), it is a historical resource and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of an historical resource is materially impaired when a project (14 CCR 15064.5[b][2]):

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, including tribal cultural resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a]-[c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

### 3.18.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES</b>				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

- a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); and/or*
- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

**Less Than Significant Impact.** It is not expected that TCRs would be disturbed as a result of implementation of the HEU, which in and of itself, does not require any construction activities and is merely the adoption of a policy document. Furthermore, Manhattan Beach is virtually built out, and the potential for uncovering TCRs during any construction activity is considered remote (City of Manhattan Beach 2003).

Since the HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the HEU. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The HEU would not change or alter state or federal policies to protect tribal cultural resources. Potential environmental impacts to TCRs are location-specific and cannot be assessed in a meaningful way until the location of a project site is known. At such time as a development proposal is considered, that project would be subject to adopted development guidelines/standards, tribal consultation if required by tribes, and any impacts identified with the development project would be addressed through mitigation measures specific to the impact. As such, the HEU would result in less than significant impacts to tribal cultural resources, and no mitigation is required.

Pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City contacted three Native American individuals and/or tribal organizations on August 4, 2021:

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians, Kizh Nation
- Kenneth Kahn, Tribal Chairman, Santa Ynez Band of Chumash Indians
- Joseph Ontiveros, Cultural Resources Director, Sobaba Band of Luiseño Indians

The Santa Ynez Band of Chumash Indians, responded on August 9, 2020, and again on August 23, 2021, stating that the Elders' Council requested no further consultation on the HEU but requested to be notified of any changes in scope, or if supplementary literature reveals additional information. No further communication was received by the Santa Ynez Band of Chumash Indians, or any other Native American individuals and/or tribal organizations contacted on August 4, 2021.



## 3.18.4 References

- Bean, Lowell J., and Florence C. Shipek. 1978. "Luiseño." In *Handbook of North American Indians: Volume 8, California*, edited by Robert F. Heizer, 550-563. Washington DC: Smithsonian Institution Press.
- Boscana, Gerónimo. 1846. *Chinigchinich: a historical account of the origin, customs, and traditions of the Indians and the missionary establishment of St. Juan Capistrano, Alta California*. London: Dodo Press.
- City of Manhattan Beach. 2003. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.
- Geiger, Maynard, and Clement W. Meighan. 1976. *As the padres saw them: California Indian life and customs as reported by the Franciscan Missionaries 1813-1815*. Santa Barbara: Santa Barbara Mission Archive Library.
- Harrington, John P. 1935. Fieldwork among the Indians of California. In: *Explorations and Fieldwork of the Smithsonian Institution in 1934*, pp. 81-84. Washington, DC. 1985 John P. Harrington Papers.
- Heizer, Robert F., and Karen M. Nissen 1973. *The human sources of California ethnography*. Berkeley: University of California Archaeological Research Facility.
- Heizer, Robert F. 1978. "Introduction." In *Handbook of North American Indians*, edited by Robert F. Heizer, 1-6. Washington: Smithsonian Institution.
- Kroeber, Alfred J. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology Bulletin 78. Dover Publications, Inc., New York.

## 3.19 Utilities and Service Systems

### 3.19.1 Environmental Setting

The City's current service area, as determined by the City's Urban Water Management Plan (UWMP) (2017), covers approximately 3.9 square miles, and encompasses the majority of the City of Manhattan Beach. The City maintains the local water distribution, sewage collection, and storm drain systems. Water is purchased from wholesale providers, and the City is responsible for storage and distribution. Sewage collected in laterals and City trunk lines flows into regional lines maintained by the Sanitation Districts of Los Angeles County (City of Manhattan Beach 2003). With regard to flood control, City storm drains direct runoff into major County-owned channels and other facilities maintained by the Los Angeles County Department of Public Works (LACDPW) (City of Manhattan Beach 2003).

Manhattan Beach obtains water from three sources: (1) Metropolitan Water District (MWD) treated surface water from Northern California and the Colorado River Basin, which is provided to the City by the West Basin Municipal Water District (WBMWD) and represents over 80% of the local water supply; (2) groundwater extracted by City-owned and operated wells; and (3) reclaimed water supplied for landscape irrigation from the West Basin Municipal Water District. Manhattan Beach owns the right to pump 3.8 million gallons per year of groundwater from the West Coast Basin. Imported water flows to Manhattan Beach via 45-inch MWD line in Manhattan Beach Boulevard. (City of Manhattan Beach 2003). Over the past ten years, the City's total water demands (including potable and recycled water) have ranged from 4,887 acre feet per year (AFY) to 5,896 AFY, with an average of 5,312 AFY.

The City's water system consists of pump stations, storage reservoirs, an elevated storage tank, water supply wells, a settling basin, and approximately 112 miles of distribution pipelines (City of Manhattan Beach 2003). Given that the built-out nature of the City accommodates a very modest level of growth, these facilities will likely not require any substantial expansion to meet long term needs (City of Manhattan Beach 2003). The City's efforts focus on maintenance and replacement as needed. Pursuant to the Water Master Plan, the City replaced the deteriorating roof of the Peck Reservoir in 2000, extending the reservoir's life by approximately 25 years (City of Manhattan Beach 2003). Wastewater treatment in the City is managed by the Los Angeles County Sanitation Districts and treated at the Joint Water Pollution Control Plant. In 2015, the total volume of wastewater collected from the City's service area was 3,340-acre feet (City of Manhattan Beach 2017).

Like most counties throughout the state, Los Angeles County is currently experiencing extreme drought conditions (NOAA/NIDIS 2021). In response to continued drought conditions, MWD's Board of Directors declared a Water Supply Alert in August 2021, calling for consumers and businesses to voluntarily reduce their water use and help preserve the region's storage reserves (City of Manhattan Beach 2021a). This declaration came less than a day after the U.S. Bureau of Reclamation declared a first-ever shortage in the Colorado River Basin (City of Manhattan Beach 2021a, BOR 2021). As a result, the City's treated imported water supplies from MWD, through WBMWD, could be impacted during a multi-year drought or other conditions which limit MWD from delivering sufficient water supplies to all of its member agencies, and consequently to the City (City of Manhattan Beach 2021a). The MWD has indicated that its supplies from the Colorado River will not be impacted in 2022 but may be impacted in 2023 and more likely in 2024, if the drought continues (City of Manhattan Beach 2021a).

The City is in the process of preparing and updating their 2020 Urban Water Management Plan (UWMP) to be in compliance with the UWMP Act (California Water Code Section 10610) and the Water Conservation Bill of 2009 (SBX7-7) (City of Manhattan Beach 2021a). The 2020 UWMP also incorporates the City's Water Shortage Contingency Plan (WSCP), which details how the City responds in the event of a declared water emergency or water shortage conditions. According to the draft 2020 UWMP, the City has reviewed its historical water demands to determine the projected water demands and water supply reliability and determined that the City is able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive year drought period (City of Manhattan Beach 2021a).).

## 3.19.2 Regulatory Setting

### Federal

#### Clean Water Act

The federal Clean Water Act, United States Code, Title 33, Sections 1251 et seq. requires that wastewater be treated prior to being discharged to waters of the United States. The Clean Water Act is described in further detail in Section 3.10, Hydrology and Water Quality, of this ND.

### State

#### Porter-Cologne Water Quality Control Act

In California, the State Water Resources Control Board and nine Regional Water Quality Control Boards (RWQCBs) are responsible for implementing the Clean Water Act and the California Porter-Cologne Water Quality Control Act

(Porter-Cologne Act). The Porter-Cologne Act authorizes the State Water Resources Control Board to implement programs to control polluted discharges into State waters. In compliance with the Porter-Cologne Act, the nine RWQCBs establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge.

### Sanitary Sewer General Waste Discharge Requirements

On May 2, 2006, the State Water Resources Control Board adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than one mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system in order to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan. The General Waste Discharge Requirements also requires that storm sewer overflows be reported to the State Water Resources Control Board using an online reporting system.

### Chapter 727, Statutes of 2005 – Water and Sewer Service Priority

Chapter 727, Statutes of 2005 (SB 1087) establishes processes to ensure the effective implementation of Government Code Section 65589.7, the statute requiring preparation of the housing element component off a General Plan. This statute requires local governments to provide a copy of the adopted housing element to water and sewer providers. In addition, water and sewer providers must grant priority for service allocations to proposed developments that include residential dwelling units affordable to lower-income households.

## Regional/Local

### Water Quality Control Plans (Basin Plans)

The Porter-Cologne Act, Section 13000, directs each RWQCB to develop a water quality control plan (Basin Plan) for all areas within its region. The Basin Plan is the basis for each RWQCB's regulatory program. The City is within the purview of the Los Angeles RWQCB (Region 4), and future development facilitated by the HEU must comply with applicable elements of the Basin Plan for Region 4. The Basin Plan gives direction on the beneficial uses of State waters, describes the water quality that must be maintained, and provides programs necessary to achieve the standards established in the Basin Plans.

### City of Manhattan Beach Master Plans

#### **Wastewater System Master Plan (2010)**

The objective of the Wastewater Master Plan is to evaluate the City's sewer collection system to provide a framework for undertaking the construction of new and replacement facilities for the service area in an efficient and cost effective manner. It is designed to aid the City in meeting some of the requirements of the Statewide General Waste Discharge Requirements issued by the California Regional Water Quality Control Board in 2006.

#### **Water Master Plan (2010)**

The purpose of the Water Master Plan (WMP) is to periodically evaluate the City's water system and provide a framework for undertaking the construction of new and replacement facilities for serving the water supply and

distribution needs in an efficient manner. The WMP report presents the methodology, analyses, findings, and recommendations of a comprehensive study of the City's potable water system and describes the water system supplied by the West Basin Municipal Water District.

### **Draft 2020 Urban Water Management Plan (2021)**

The City is a water supplier and is required to prepare an Urban Water Management Plan (UWMP) in accordance with the California Urban Water Management Planning Act (UWMP Act) (California Water Code Section 10610) and the Water Conservation Bill of 2009 (SBX7-7) The Act requires every "urban water supplier" to prepare and adopt a Plan, periodically review its Plan at least once every five years and make any amendments or changes which are indicated by the review. Pursuant to California Water Code Section 10617, an "Urban Water Supplier" is defined as a supplier, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The primary objective of the UWMP Act is to direct urban water suppliers to evaluate their existing water conservation efforts and, to the extent practicable, review and implement alternative and supplemental water conservation measures. The UWMP Act is directed primarily at retail water purveyors where programs can be immediately affected upon the consumer.

The City is in the process of preparing and updating the 2020 UWMP (City of Manhattan Beach 2021). Projected population in the City's service area is based on projections obtained from SCAG's 2020-2045 RTP/SCS (City of Manhattan Beach 2021). The SCAG data incorporates demographic trends, existing land use, general plan land use policies, and input and projections from the Department of Finance and the U.S. Census Bureau.

### City of Manhattan Beach General Plan

Goal I-7: Maintain and protect a reliable and cost-effective water supply system capable of adequately meeting normal demand and emergency demand in the City.

Policy I-7.1: Periodically evaluate the entire water supply and distribution system to ensure its continued adequacy, reliability, and safety.

Policy I-7.2: Ensure that all new development or expansion of existing facilities bears the cost of providing adequate water service to meet the increased demand which it generates.

Policy I-7.3: Educate the public in the importance of water conservation and require new development to comply with local and state codes for water conservation.

Policy I-7.4: Support expanded use of reclaimed water.

Policy I-7.5: Support the exploration of the feasibility of desalinated seawater as a reliable potable water source.

Goal I-8: Maintain a sewage system adequate to protect the health and safety of all Manhattan Beach residents and businesses.

Policy I-8.1: Evaluate the sewage disposal system periodically to ensure its adequacy to meet changes in demand and changes in types of waste.

Policy I-8.2: Ensure that all new development or expansion of existing facilities bears the cost of expanding the sewage disposal system to handle the increased load, which they are expected to handle.

Goal I-12: Protect the quality of the environment by managing the solid waste generated in the community.

Policy I-12.1: Encourage maximum recycling in all sectors of the community, including residential, commercial, industrial, institutional, and the construction industry.

Policy I-12.3: Encourage the maximum diversion of construction and demolition materials.

### 3.19.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

**Less Than Significant Impact.** Pursuant to Chapter 727, Statutes of 2005 (SB 1087) the City is required to deliver its adopted Housing Element and any amendments thereto to local water and sewer service providers. This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects. The City is the direct provider of water, sewer, and storm drain maintenance. As such, the City will internally coordinate with the Public Works Department for review and consideration when reviewing new residential projects. Program 24, Priority Services, of the proposed HEU would require coordination with the City of Manhattan Beach Public Works Department to ensure that adopted policies prioritize water and sewer allocation for affordable housing development facilitated by the HEU.

All existing capacity parcels selected in the HEU sites analysis were reviewed for any known environmental constraints, sewer and water capacity, and dry utilities. The sites included in the existing sites inventory all have access to existing sewer and water capacity, dry utilities, and are not constrained by known site-specific or environmental constraints that would limit development. Potential sites in the CG and PD Districts that require an overlay or rezoning to permit residential uses were also included in the site analysis based on the Adequate Sites Program included in the HEU required to address a RHNA shortfall.

While some potential sites for rezoning do not meet the underutilized criteria (particularly related to inappropriate zoning), any future rezoning or residential development facilitated by the HEU would require further review under CEQA, which would include a requirement to determine if the project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Goals and policies provided for in the General Plan also explicitly require the City to plan for and have the capacity to respond to fluctuating levels of utilities demand. For example, Goals I-8 and Policies I-8-1 and I-8-2 of the General Plan require that the City maintain a sewage system adequate to protect the health and safety of all Manhattan Beach residents. This includes conducting periodic evaluation of the sewage disposal system to ensure its adequacy to meet changes in demand, as well as ensuring that all new development or expansion of existing facilities bears the cost of expanding the sewage disposal system to handle the increased load. Further, Goal I-7 mandates the provision of a reliable and cost effective water supply system capable of adequately meeting normal demand and emergency demand while Policy I-7.2 requires periodic evaluation of the entire water distribution system, and would ensure that all new development or expansion of existing facilities bears the cost of providing adequate water service to meet the increased demand which it generates (City of Manhattan Beach 2003). These goals and policies are supported and facilitated by the MBMC requirements, as per the General Plan.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and are unlikely to require expansion of existing systems or the construction of new systems. However, project level review of future development anticipated by the HEU, as required under CEQA, would ensure that

all impacts to the existing utilities facilities are less than significant. The HEU would not change or alter policies related to utilities and system services. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

**b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

**Less Than Significant Impact.** The City's water supply sources include treated groundwater through the West Coast Basin (WCB), treated imported water purchased from MWD through WBMWD, and recycled water supplies from WBMWD (City of Manhattan Beach 2021a). The City's main source of water supply is purchased imported water from MWD through WBMWD (City of Manhattan Beach 2021a). As discussed above in Section 3.19.1, Environmental Setting, the Bureau of Reclamation declared a first-ever water shortage in the Colorado River Basin (BOR 2021). The MWD has indicated that its supplies from the Colorado River will not be impacted in 2022 but may be impacted in 2023 and more likely in 2024, if the drought continues (City of Manhattan Beach 2021a). As such, imported water supplies to the City, through WBMWD, may be impacted in the event MWD implements its Water Supply Allocation Plan (WSAP) due to a water supply shortage. The WSAP provides a means of equitably providing reduced water supplies to each of MWD's member agencies for up to 10 levels of reduction representing up to a 50% reduction (City of Manhattan Beach 2021a). Among other things, the WSAP would implement higher rates for increased use among its member agencies, including the WBMWD and by extension, the City (City of Manhattan Beach 2021a). In the event the WSAP is implemented by the MWD, the City has prepared a Water Shortage Contingency Plan (WSCP) in tandem with the 2020 UWMP update (City of Manhattan Beach 2021a). The City's plan for water usage during periods of shortage is designed to incorporate six standard water shortage levels corresponding to progressive ranges from up to 10, 20, 30, 40, and 50% shortages and greater than a 50% shortage (City of Manhattan Beach 2021a). A full listing of all the restrictions and prohibitions associated with each shortage level is provided in Section 8.4.1 of the City's draft 2020 UWMP (City of Manhattan Beach 2021a). The WSCP also includes permanent water conservation measures related to landscaping irrigation, cleaning and car washing, decorative water features, eating and drinking establishments, hotels, and commercial establishments (City of Manhattan Beach 2021a).

As discussed above, imported water from the MWD is not the City's sole water supply source. The City also extracts water from the Silverado aquifer of the WCB, where it has an adjudicated right of approximated 1,130 AFY. In addition, the WCB Judgment, amended in September 2014, allows up to an additional 10,000 acre-feet of emergency pumping over a four (4) month period in the WCB under specified conditions, which must be shared across all parties of the WCB Judgment, including the City. In addition to groundwater, the City has purchased from the WBMWD and supplied recycled water to customers for non-potable irrigation uses since 1995 (City of Manhattan Beach 2021a). The City has coordinated the preparation of its 2020 UWMP with WBMWD, and will continue to coordinate with WBMWD and take advantage of opportunities to expand recycled water facilities throughout its borders to allow for optimization of recycled water use within the City (City of Manhattan Beach 2021a).

The City has also adopted a revised Water Conservation Ordinance, which is actively enforced during drought situations and specifies water conservation requirements. Enforcement includes patrolling to educate customers and if necessary, issuing warnings and citations for violations. All citations and violations are reported annually (City of Manhattan Beach 2021a). According to the draft 2020 UWMP, the

City has determined that it is able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive year drought period (City of Manhattan Beach 2021a).

Ultimately, the HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and is unlikely to require expansion of existing systems or the construction of new systems. However, project level review as required under CEQA would ensure that all impacts to the existing utilities facilities are less than significant. The HEU would not change or alter policies related to utilities and system services and the City would therefore have sufficient water supplies for the project and reasonably foreseeable future development pursuant to the project. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- c) ***Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

**Less Than Significant Impact.** The City owns, operates, and maintains its local wastewater collection and pumping system. Collected effluent is treated at the Joint Water Pollution Control Plant (JWPCP) in the City of Carson, operated by the Los Angeles County Sanitation Districts (LACSD). According to the General Plan, the collection system adequately serves the City. The City has undertaken a complete inspection of the entire system via videotaping, and priorities for line replacement have been established to ensure long-term reliability (City of Manhattan Beach 2003). In 2015, LACSD's JWPCP had a treatment capacity of approximately 400 million gallons per day and the total volume of wastewater collected from the City's service area was 3,340-acre feet, or approximately 2,981,759 gallons per day (City of Manhattan Beach 2017), which represented less than 1% (or approximately 0.75%) of the total JWPCP capacity.<sup>13</sup> As such, it is unlikely that the increased demand on the wastewater system associated with 774 required RHNA units would have a substantial impact, given that the City's historic total annual generation represents only a small fraction of the treatment provider's total capacity (0.75%).

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<sup>13</sup> The total collected wastewater from the City was converted from 3,340 acre feet per year to gallons per day by multiplying the volume over time value by 893, resulting in 2,981,759 acre feet per year. The acre feet value was then divided by the total capacity of the JWPCP to arrive at .75%.



The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and are unlikely to require expansion of existing systems or the construction of new systems. However, project level review as required under CEQA would ensure that all impacts to the existing utilities facilities, including facilities maintained by the wastewater treatment provider, are less than significant. The HEU would not change or alter policies related to wastewater treatment systems or services. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- d) ***Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

**Less Than Significant Impact.** Goal I-12 of the City's General Plan mandates the City protect the quality of the environment by managing the solid waste generated in the community (City of Manhattan Beach 2003). This mandate is supported by Policies I-12.1 and I-12.3, which encourage maximum recycling in all sectors of the community, including residential developments, and encouraging maximum diversion of construction and demolition materials.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and are unlikely to require expansion of existing systems or the construction of new systems. However, project level review as required under CEQA would ensure that all impacts to the existing utilities facilities, including waste management facilities, are less than significant. The HEU would not change or alter policies related to waste management system services. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

**Less Than Significant Impact.** The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems which are unlikely to require expansion of existing systems or the construction of new systems (City of Manhattan Beach 2003). Any future development projects facilitated by the HEU would be required to comply with all applicable federal, State, and local regulations to avoid potential impacts related to the solid waste facilities, and project level review as required under CEQA would ensure that all impacts to the existing utilities facilities, including solid waste facilities, are less than significant. Approval of the HEU itself, as a policy document, would not change these regulations, and would not provide any goals, policies, or programs that would result in noncompliance with the applicable regulatory environment. Therefore, impacts from the HEU related solid waste would be less than significant, and no mitigation is required.

## 3.19.4 References

BOR (U.S. Bureau of Reclamation). 2021. *Reclamation announces 2022 operating conditions for Lake Powell and Lake Mead*. August 16, 2021. Accessed October 7, 2021. <https://www.usbr.gov/newsroom/#/news-release/3950>.

City of Manhattan Beach. 2003. City of Manhattan Beach General Plan. Accessed October 3, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2017. 2015 Urban Water Management Plan. Accessed October 3, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/34878/636547389049430000>.

City of Manhattan Beach. 2021a. 2020 Urban Water Management Plan (Draft). Accessed October 7, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/48186/637698204957230000>.

City of Manhattan Beach 2021b. Notice of Public Hearing: 2020 Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan. Accessed October 7, 2021. <https://www.manhattanbeach.gov/Home/Components/News/News/4957/43>.

NOAA (National Oceanic and Atmospheric Administration)/ NIDIS (National Integrated Drought Information System). 2021. Current U.S. Drought Monitor Conditions for California. Accessed October 7, 2021. <https://www.drought.gov/states/california>.

## 3.20 Wildfire

### 3.20.1 Environmental Setting

Per California Government Code Section 51177A, a wildfire is an unplanned, unwanted wildland fire (i.e. a fire that originates in a non-built environment), including unauthorized human-caused fires, escaped wildland fire use events, escaped prescribed fire events, and all other wildland fires where the objective is to extinguish the fire. A wildland-urban interface (WUI) is an area where urban development is adjacent or in close proximity to open space or “wildland” areas (FEMA 2021). CAL FIRE has mapped areas of significant fire hazards in the State, which recognizes areas prone to wildfire hazards. According to the City’s General Plan, due to the City’s built out nature and urbanized adjacent communities, urban fires represent the sole fire threat in the City.

### 3.20.2 Regulatory Setting

#### Federal

##### Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; supports

implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency (County of Los Angeles 2014).

## State

### California Health and Safety Code Section 13000 et seq.

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code [CBC] noted below), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

### California Code of Regulations Title 24, Part 2

The State of California provided a minimum standard for building design through the 2019 CBC, which is located in Part 2 of Title 24 of the California Code of Regulations. This part incorporates by adoption the 2018 International Building Code of the International Code Council with necessary California amendments. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

### California Code of Regulations Title 24, Part 9

Part 9 of Title 24 of the California Code of Regulations refers to the 2019 California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This code is preassembled with the 2000 Uniform Fire Code of the Western Fire Chiefs Association. This part incorporates by adoption the 2018 California Fire Code of the International Code Council with necessary California amendments.

### California Public Resources Code Sections 4201–4204

This section of the California Public Resources Code was amended in 1982 to require the California Department of Forestry to classify all State Responsibility Areas (SRAs) into fire hazard severity zones (FHSZs). The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be used to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

## State Responsibility Area Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry and Fire Protection)

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRAs. Title 14 mandates that the future design and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures.

### Local/Regional

#### Fire Hazard Severity Zones

According to the California Department of Forestry and Fire Protection (CAL FIRE) (2021) while most of California is subject to some degree of fire hazard, there are specific features that make some areas more hazardous. CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These designations, referred to as Fire Hazard Severity Zones (FHSZ), mandate how people construct buildings and protect property to reduce risk associated with wildland fires. The maps were last updated in 2007-2010. They are currently being updated to incorporate improved fire science, data and mapping techniques. The proposed Fire Hazard Severity Zone maps denote lands of similar hazards where the state has financial responsibility for wildland fire protection, known as state responsibility area or SRA, and will be available for review and public comment. It is anticipated that in late 2020 or 2021 CAL FIRE will produce Fire Hazard Severity Zone maps for the areas of California where local governments have financial responsibility for wildland fire protection, known as Local Responsibility Area or LRA. Per law, only lands zoned as Very High Fire Hazard Severity are identified within local responsibility areas (CAL FIRE 2021a).

### Local

#### City of Manhattan Beach General Plan

The following General Plan goals and policies are applicable to the HEU related to wildland fires.

Goal CS-1: Minimize the risks to public health, safety, and welfare resulting from natural and human caused hazards.

Policy CS-1.1: Prepare and disseminate information to residents and businesses on preparing for and responding to natural disasters and threats to public safety.

Policy CS-1.2: Encourage and assist the school district in teaching children annually to respond appropriately in an emergency and to threats to personal safety.

Policy CS-1.3: Ensure that public and private water distribution and supply facilities have adequate capacity and reliability to supply both everyday and emergency fire-fighting needs

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.1: Support the continued active enforcement of the building and fire code.

Policy CS-3.3: Inform all residents of the requirements for visible and clearly legible street numbers to minimize the response time of emergency personnel.

Policy CS-3.4 Ensure that street signs are legible and easy to find by both emergency response personnel and the general public.

Policy CS-3.5: Review the City’s emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.6: Review the location, size, and equipment at each designated emergency shelter periodically to ensure that the City will be able to accommodate all people likely to need shelter in the event of a disaster.

Policy CS-3.7: Support the use of the best available equipment and facilities to ensure safety that meets the changing needs of the community.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Policy CS-3.10: Strive to reduce emergency response time

### 3.20.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan;*
- b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;*
- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or*
- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

**No Impact.** Based on the CAL FIRE’s Fire Hazard Severity Zones maps (CAL FIRE 2021), the City, is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones (VHFHSZ). As such, risk of wildfire is essentially non-existent. Additionally, the HEU is a policy document and adoption would not, in and of itself, result in negative environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City’s RHNA allocation. However, given that no portions of the City lie within VHFHSZ, no impacts would occur.

### 3.20.4 References

CAL FIRE (California Department of Forestry and Fire Protection). 2021a. Fire Hazard Severity Zone. <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildfire-prevention-engineering/fire-hazard-severity-zones>.

CAL FIRE 2021b. Fire Hazard Severity Zone Viewer. Accessed October 2, 2021. <https://egis.fire.ca.gov/FHSZ/>.

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed October 2, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

FEMA (Federal Emergency Management Agency). 2021. Wildland Urban Interface (WUI). Accessed October 5, 2021. <https://www.usfa.fema.gov/wui/>.

### 3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

**Less than Significant Impact.** As discussed in Section 3.4, Biological Resources, of this IS/ND, the City is completely developed and does not support sensitive vegetation, sensitive wildlife species, or sensitive habitat. Additionally, the no area of the City functions as a corridor for the movement of native or migratory wildlife. All future activities associated with the HEU would be conducted in the highly urbanized environment of the City. Construction noise related to projects accommodated by the HEU have the potential to disturb nesting birds potentially nesting in the trees and vegetation. However, these impacts would be temporary in nature and would address via compliance with the MBTA, which protects all migratory birds, including their eggs, nests, and feathers. Further, as described in Section 3.5 of this IS/ND, the City does not support any examples of major periods in California prehistory. However, the City does

contain a number of notable historic features, such as the Manhattan Beach State Pier, and historic residences such as Scott House and 2820 Highland Avenue. These features would be protected via compliance with existing State, and local regulations, including relevant CEQA statutes and guidelines.

As discussed throughout this IS/ND, the HEU is a policy document and adoption of the HEU alone would not produce environmental impacts. Although implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle, the HEU does not identify, describe, promote, entitle, or permit any particular residential development project. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, after compliance with the existing regulatory environment applicable to cultural and biological resources, the HEU would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant, and no mitigation is required.

The HEU does not change the allowed densities or type of development that may occur within the City at this time. The act of adopting the HEU does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered or threatened species; or historic resources. As discussed in Sections 3.1 through 3.19 of this IS/ND, impacts associated with the adoption of the HEU would either result in no impacts or less than significant impacts. As such, the HEU would not substantially degrade the quality of the environment, reduce habitat, cause habitat population decline, threaten plant and animal communities or substantially reduced the range of a species, or eliminate important examples of the major periods of California's history or prehistory. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- b) ***Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)***

**Less than Significant Impact.** The HEU would not result in potentially significant project-level impacts. As discussed throughout this IS/ND, the HEU is a policy document and adoption of the HEU alone would not produce environmental impacts. Although implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, the HEU does not identify, describe, promote, entitle, or permit any particular residential development project. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time.

All reasonably foreseeable future cumulative development in the City would be subject to the same land use and environmental regulations that have been described throughout this document. Furthermore, all development projects are guided by the policies identified in the City's General Plan and by the regulations established in the MBMC. Therefore, compliance with applicable land use and environmental regulations would ensure that environmental effects associated with the accommodation of future housing



development would not combine with effects from reasonably foreseeable future development in the City to cause cumulatively considerable significant impacts. Cumulative impacts would therefore be less than significant. No mitigation is required.

- c) ***Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

**Less than Significant Impact.** As detailed throughout this IS/ND, the HEU in and of itself would not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, air quality, hazards and hazardous materials, noise, public services, or transportation. The HEU does not change the allowed densities or type of development that may occur within the City at this time. The act of adopting the HEU does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting human beings. As discussed in Sections 3.1 through 3.20 of this IS/ND, impacts associated with the adoption of the HEU would either result in no impacts or less than significant impacts. As such, the HEU would not have environmental effects causing substantial adverse effects on humans, impacts from the HEU would be less than significant, and no mitigation is required.

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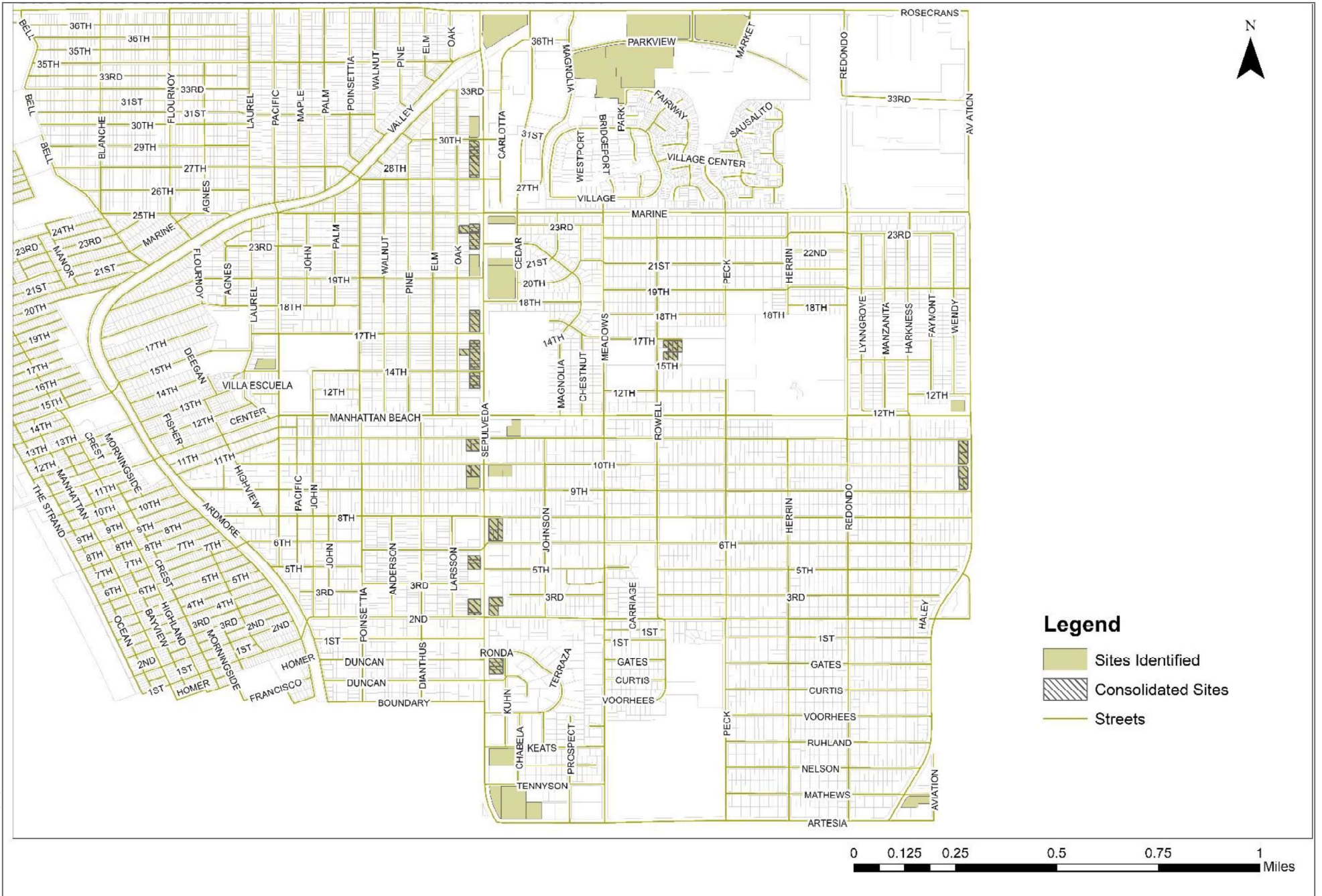
# 4 Preparers

## 4.1 List of Preparers

### Dudek

Nicole Cobleigh, Project Manager  
Samantha Robinson, Environmental Planner  
Jennifer Reed, Air Quality Service Manager  
Ian McIntire, Air Resources Specialist

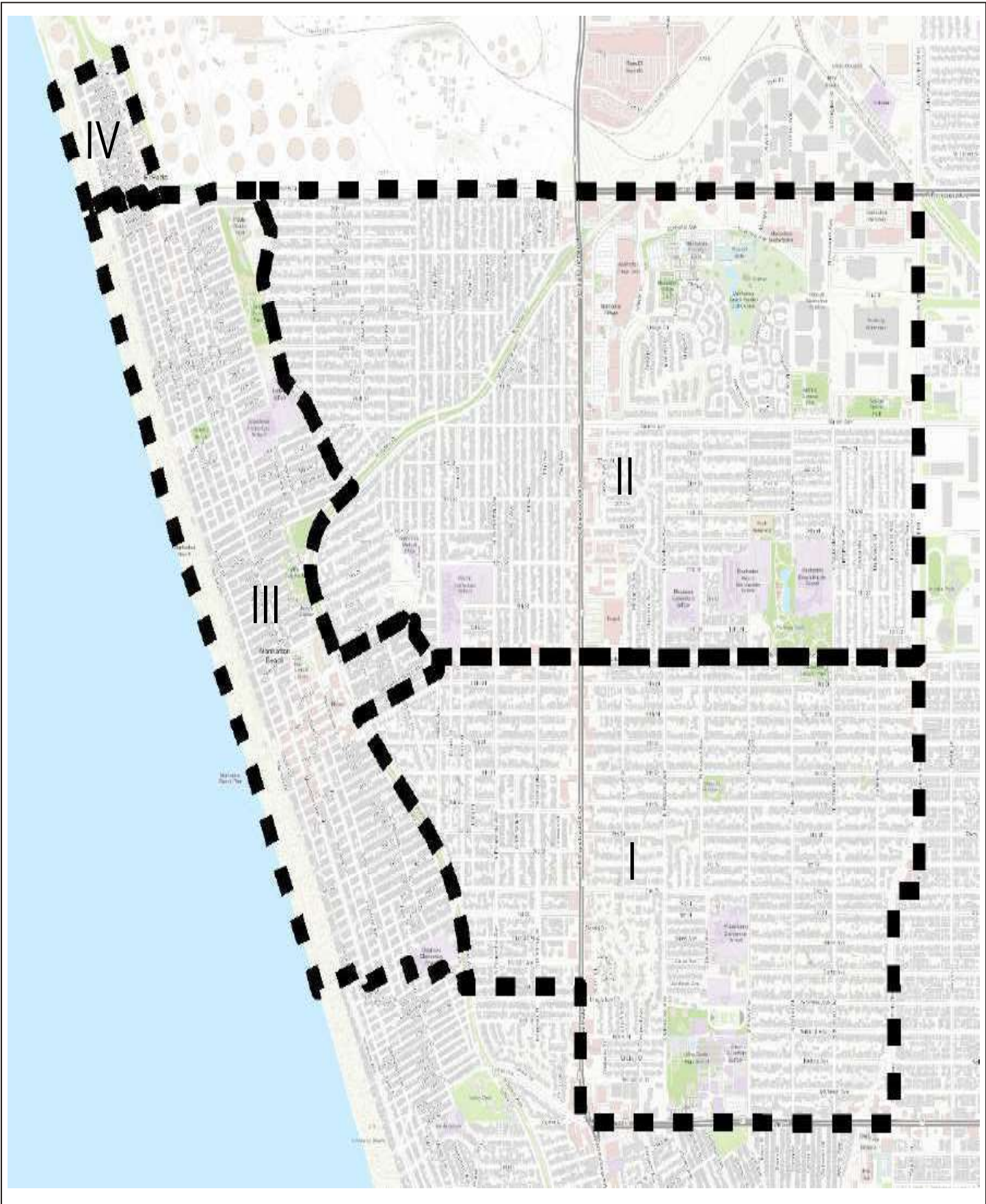
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SOURCE: City of Manhattan Beach

**FIGURE 2.2-1**  
 Potential Sites to Accommodate Lower-Income Shortfall  
 IS/ND Manhattan Beach Housing Element Update  
 Page 213 of 1239  
 PC-MTG 01-12-2022

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SOURCE: City of Manhattan Beach

**FIGURE 2.3-1**  
Area District Map

IS/ND Manhattan Beach Housing Element Update

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Area District Boundaries

**Zoning Designations & Overlays**

Residential Districts

- RS** Residential Single Family
  - D1-Design Review -Rosecrans Avenue
  - D3-Design Review -Gaslamp Neighborhood
  - D4-Design Review -Traffic Noise Impact Area
  - D6- Design Review -Oak Avenue
  - D7- Design Review -Longfellow Drive
  - D8- Design Review -Sepulveda Corridor

- RM** Residential Medium Density
  - D1- Design Review -Rosecrans Avenue
  - D8- Design Review -Sepulveda Corridor

- RH** Residential High Density
  - D2- Design Review -11th Street

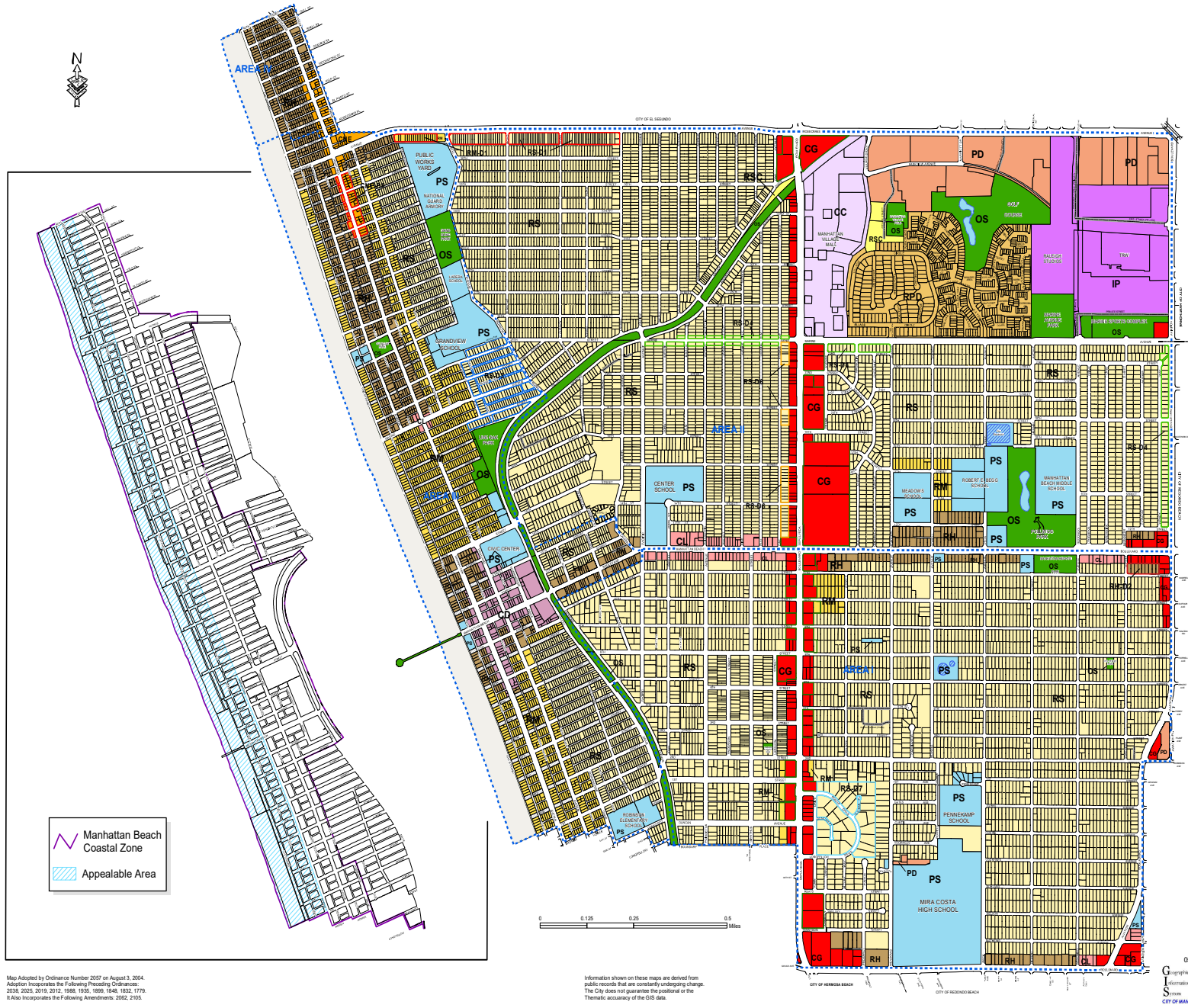
- RPD** Residential Planned Development
- RSC** Residential Senior Citizen

Commercial Districts

- CL** Local Commercial
- CC** Community Commercial
- CG** General Commercial
  - D8- Design Review -Sepulveda Corridor
- CD** Downtown Commercial
- CNE** North End Commercial
  - D5- Design Review -North End Commercial

Other Districts

- PD** Planned Development
- IP** Industrial Park
- PS** Public and Semi-Public
- OS** Open Space



Map Adopted by Ordinance Number 2057 on August 3, 2004.  
 Adoption Incorporates the Following Preceding Ordinances:  
 2036, 2035, 2019, 2012, 1999, 1935, 1931, 1948, 1932, 1776  
 It Also Incorporates the Following Amendments: 2052, 2105.

Information shown on these maps are derived from public records that are constantly undergoing change. The City does not guarantee the positional or thematic accuracy of the GIS data.

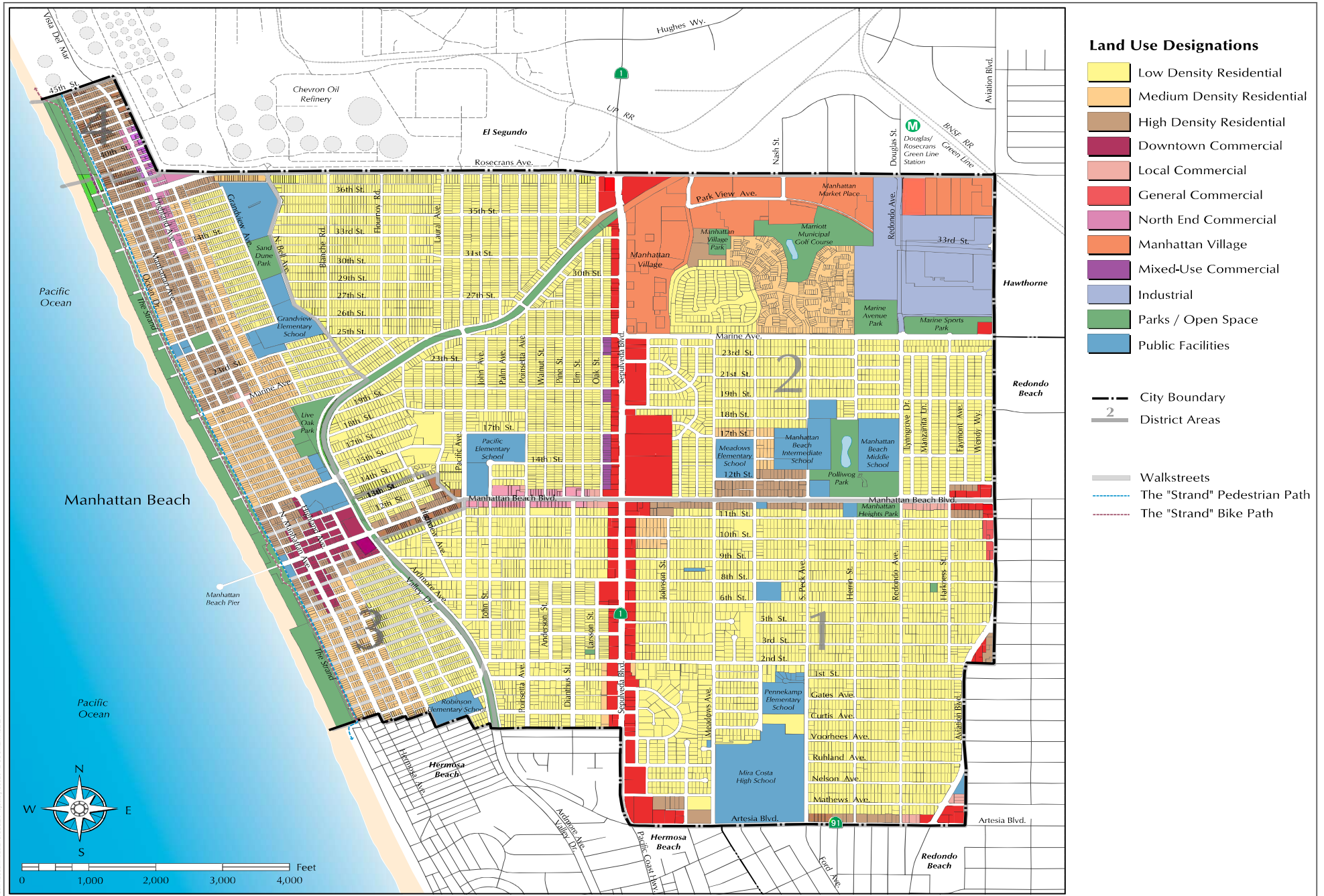
05/03/2019  
 Geographic Information Systems  
 CITY OF MANHATTAN BEACH

SOURCE: City of Manhattan Beach



**FIGURE 2.3-2**  
Existing Zoning

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SOURCE: City of Manhattan Beach

FIGURE 3.1-1

Existing Land Use

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# **ATTACHMENT A**

## Notice of Intent Comment Letter

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 266-3562  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

December 17, 2021

Talyn Mirzakhanian  
City of Manhattan Beach  
Community Development  
1400 Highland Avenue  
Manhattan Beach, CA 90266

RE: City of Manhattan Beach  
Housing Element Update 2021-2029  
SCH # 2021110408  
GTS # 07-LA-2021-03779

Dear Talyn Mirzakhanian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced Draft Initial Study (IS). The project would amend the City of Manhattan Beach General Plan by replacing the current Housing Element with the proposed 2021-2029 Housing Element. The Housing Element Update will further the goal of meeting the existing and projected housing needs of all family income levels and provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) Allocation of 774 housing units through the year 2029. The Housing Element Update site inventory does not require zoning changes; however, a future rezoning program may be needed for additional housing needs required by HCD. The City of Manhattan Beach is the Lead Agency under the California Environmental Quality Act (CEQA).

The project covers the City of Manhattan Beach, which includes the State facility SR-1. From reviewing the Draft IS, Caltrans has the following comments:

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/>

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. Caltrans supports the use of TDM measures to decrease VMT. Implementing TDM strategies aligns with Caltrans's mission is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

Talyn Mirzakhanian  
December 17, 2021  
Page 2 of 2

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>

Caltrans looks forward to reviewing the CEQA documents of future housing developments that emerge from these plan and program updates, and collaborating with the City of Manhattan Beach on identifying TDM strategies to limit VMT from these future projects.

If you have any questions about these comments, please contact Diana DeGroot, the project coordinator, at [Diana.DeGroot@dot.ca.gov](mailto:Diana.DeGroot@dot.ca.gov), and refer to GTS # 07-LA-2021-03779.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

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# ATTACHMENT 2

## RESOLUTION NO. PC 22-02

### RESOLUTION OF THE MANHATTAN BEACH PLANNING COMMISSION RECOMMENDING THAT THE CITY COUNCIL ADOPT THE 6TH CYCLE (2021 – 2029) HOUSING ELEMENT OF THE GENERAL PLAN

#### THE MANHATTAN BEACH PLANNING COMMISSION DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The Housing Element is one of the State-mandated elements of a General Plan. State law requires that jurisdictions update the Housing Element every eight years. All jurisdictions in the Southern California Association of Governments (SCAG) region are required to update their General Plan Housing Element for the 2021-2029 planning period (the 6th cycle) by October 2021, albeit with a 120-day grace period. This project proposes an update to the City of Manhattan Beach General Plan Housing Element (“the Project”) in accordance with Sections 65580 – 65589.11 of California Government Code.

SECTION 2. On July 20, 2021, the City commissioned Dudek Consultants to assist in the preparation of the 6th Cycle Housing Element update (the “Project”) and associated environmental documentation.

SECTION 3. Associated public meetings were held on the following dates and noticed on the City’s website, in a newspaper of general circulation, via email to interested parties, and via the City’s social media platforms:

- August 24, 2021 - City Council Meeting
- August 31, 2021 - Stakeholder’s Workshop
- September 15, 2021 - Planning Commission Meeting
- September 21, 2021 - City Council Meeting
- November 2, 2021 – City Council Meeting
- December 8, 2021 - Planning Commission Meeting

SECTION 4. As required by State law, the Draft of the 6th Cycle Housing Element was submitted to the State Department of Housing and Community Development (HCD) for review on October 15, 2021 and released for public review on October 20, 2021. HCD issued comments on the Draft Housing Element on December 14, 2021. Staff also received four comments from the public during the public review period. Revisions have been made to the Housing Element to address HCD’s and the public’s comments. The final document will be submitted to HCD for certification subsequent to adoption by the City Council.

SECTION 5. On January 12, 2022, the Planning Commission conducted a duly noticed public hearing to consider the Project, during which the Planning Commission received a presentation by staff and testimony from members of the public. The Planning Commission also received and reviewed written testimony received by the City prior to the public hearing.

SECTION 6. The City has reviewed the Project for compliance with the California Environmental Quality Act and has prepared an Initial Study/Negative Declaration (IS/ND). The Planning Commission recommended adoption of the ND to the City Council per Resolution No. PC 22-01.

SECTION 7. The proposed Housing Element update is consistent with the other General Plan elements and furthers goals related to: meeting existing housing needs; planning for future growth; protecting and enhancing Manhattan Beach’s neighborhoods; and providing new housing opportunities and equal opportunities.

SECTION 8. Based upon the foregoing, the Planning Commission hereby recommends that the City Council **ADOPT** the 6th Cycle (2021 – 2029) Housing Element update to the City’s General Plan, incorporated herein by reference and as “Exhibit A.”

SECTION 9. The Planning Commission’s decision is based upon each of the totally independent and separate grounds stated herein, each of which stands alone as a sufficient basis for its decision.

SECTION 10. The Secretary of the Planning Commission shall certify to the adoption of this Resolution and shall forward a copy of this Resolution to the Applicant. The Secretary shall make this resolution readily available for public inspection.

January 12, 2022

---

Planning Commission Chair

I hereby certify that the following is a full, true, and correct copy of the Resolution as **ADOPTED** by the Planning Commission at its regular meeting on **January 12, 2022** and that said Resolution was adopted by the following vote:

**AYES:**

**NOES:**

**ABSTAIN:**

**ABSENT:**

---

**Carrie Tai, AICP,**  
Secretary to the Planning Commission

---

**Rosemary Lackow,** Recording Secretary

**Exhibits**

Exhibit A: Final 6th Cycle Housing Element



# CITY OF MANHATTAN BEACH

# 6TH CYCLE HOUSING ELEMENT

(2021-2029)

DRAFT FOR ADOPTION—JANUARY 2022



**DUDEK**

38 North Marengo Avenue  
Pasadena, CA 91101  
626.204.9800 | [dudek.com](http://dudek.com)

## Table of Contents

1	Introduction.....	1
2	Housing Element Organization .....	2
3	Public Engagement .....	3
4	General Plan Consistency.....	4
5	Goals and Policies .....	5
6	Program Implementation.....	7

## Appendices

Appendix A: 5th Cycle Review

Appendix B: Needs Assessment

Appendix C: Constraints and Zoning Analysis

Appendix D: Affirmatively Furthering Fair Housing

Appendix E: Sites Analysis and Inventory

Appendix F: Community Engagement Summary

# Housing Element

## 1 Introduction

The Housing Element of the General Plan addresses the comprehensive housing needs in Manhattan Beach for the 8-year planning period (2021–2029). It provides an analysis of the local housing needs for all income levels, details barriers to providing needed housing, and identifies a set of strategies for meeting the housing need within the planning period. Housing Elements are one of seven required components of a General Plan and are guided by State law, which requires local governments to update their Housing Elements every 8 years. This is the 6th update to the City of Manhattan Beach (City) Housing Element (6th Cycle).

The Housing Element is a strategic vision and policy guide designed to help address the comprehensive housing needs of the City over an 8-year period (2021–2029 planning period). It defines the City’s housing needs, identifies the barriers or constraints to providing needed housing, and provides policies to address these housing needs and constraints.

Recent amendments to housing and planning laws aim to address California’s housing shortage, placing a substantial number of new requirements for the 6th Cycle Housing Element. Housing in California has become some of the most expensive in the nation, ranking 49th out of 50 states in homeownership rates and the supply of housing per capita. Only one-half of California’s households are able to afford the cost of housing in their local regions.<sup>1</sup> Every county and city across the State is required by law to adequately plan for their fair share of needed housing.

The City must adequately plan for its existing and projected housing needs, including its share of the Regional Housing Needs Allocation (RHNA), as identified by the State with input from the Southern California Association of Governments and local cities and counties. Although the City is not required to build housing, the State requires each local government to demonstrate where housing can reasonably be expected to be added within this cycle and how the City will facilitate and incentivize its production. As identified by the 6th Cycle RHNA, the City must plan for 774 housing units, which are further broken down by income level.

The City’s 6th Cycle RHNA targets are broken down by income level, as follows:

- Extremely Low-Income = 161 units
- Very Low-Income = 161 units
- Low-Income = 165 units
- Moderate-Income = 155 units

---

<sup>1</sup> Government Code Section 65589.5(2)(E)

## 2 Housing Element Organization

The Housing Element identifies goals, policies, and programs to comprehensively address the housing needs of all current and anticipated residents at all income levels over the upcoming housing period of 2021 through 2029. The Housing Element is divided into chapters, and supporting documentation is included as appendices of the Housing Element.

### Housing Element Content

- **Introduction** provides an overview of the Housing Element, its relationship to State law, the City's RHNA, and the Housing Element's organization.
- **Public Engagement** describes the outreach process that was undertaken through the Housing Element update process, and the input received that informed the development of this Housing Element.
- **General Plan Consistency** details those policies identified throughout the elements of the General Plan that guided the policies set forth in the Housing Element to ensure that consistency is maintained throughout the General Plan.
- **Goals and Policies** specifies the City's plans for meeting the existing and projected comprehensive housing needs of Manhattan Beach.
- **Program Implementation** identifies the specific actions that will be implemented to ensure that Manhattan Beach's housing needs are met within the planning period.

### Appendices

- **Appendix A - 5th Cycle Review** evaluates the efficacy of the 5th Cycle Housing Element; the progress in Housing Element implementation; and the appropriateness of the goals, policies, and programs.
- **Appendix B – Needs Assessment** provides a community profile assessing the housing need through detailed information on Manhattan Beach's demographic characteristics and trends that influence supply and demand of various housing types.
- **Appendix C - Constraints and Zoning Analysis** details governmental and non-governmental constraints to the maintenance, improvement, and development of housing for all income levels.
- **Appendix D - Affirmatively Further Fair Housing Analysis** identifies disproportionate housing needs, including segregated living patterns, concentrated areas of poverty, disparities in access to opportunity, and displacement risk.
- **Appendix E - Sites Analysis and Inventory** describes the methodology by which the City can accommodate its RHNA targets, and provides an inventory of the sites identified to meet the housing need.
- **Appendix F - Community Engagement Summary** provides the detailed results of the outreach conducted for the update to the Housing Element.

### 3 Public Engagement

The City conducted a robust public outreach program that engaged a broad spectrum of the community and stakeholders. Stay-at-home orders of 2021 provided the City with opportunities to explore new avenues for public engagement and increased access for those who are traditionally not involved in the planning process. Outreach and formal engagement activities were held across a variety of platforms, including a virtual stakeholder and community workshop, interactive poll, public review period, and study sessions and public hearings.

The outreach conducted for the update to the Housing Element engaged a broad range of community members and stakeholders alike, including, but not limited to, public policy advocates, the South Bay Association of Realtors, and residents. The City cast a wide net to gain participation from all segments of Manhattan Beach's interested parties. The extensive outreach process conducted for this Housing Element update contributed to a set of meaningful goals, policies, and programs that reflect Manhattan Beach's housing needs and the priorities and needs of all of those in Manhattan Beach, including those with special needs and lower-income populations. **Appendix F, Community Engagement Summary**, provides a comprehensive summary detailing the outreach conducted as part of the update to the Housing Element and corresponding materials.

## 4 General Plan Consistency

The California Government Code requires that a General Plan prepared by a local government contain an integrated, internally consistent set of goals, policies, and programs. The structure of this Housing Element is built on the same foundation that all other elements of the General Plan were formed. In addition, the Housing Element goals complement those found in the other elements of the General Plan. Cohesive housing policies that are appropriate to Manhattan Beach were designed through this coordination.

The City of Manhattan Beach will maintain consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with all elements of the General Plan. Under State law, the General Plan requires an annual review and report to examine amendments and implementation status. In line with the other General Plan elements, the goals of the Housing Element aim to do the following:

- Meet existing housing needs
- Plan for future growth
- Protect and enhance Manhattan Beach's neighborhoods
- Provide new housing opportunities and equal opportunities



## 5 Goals and Policies

### **Goal 1: A preserved and enhanced housing stock within high-quality neighborhoods that aligns with the needs of all current and future Manhattan Beach households.**

Policy 1.1: Preserve the scale of development in existing residential neighborhoods.

Policy 1.2: Facilitate the development of housing through the removal of local regulatory constraints, especially for housing that serves lower-income households and those with special needs.

Policy 1.3: Conserve existing dwelling units.

Policy 1.4: Preserve the existing affordable housing stock.

### **Goal 2: An adequate supply of sites and resources appropriate for accommodating a diverse range of housing types for all income levels.**

Policy 2.1: Provide adequate sites for new housing consistent with the Regional Housing Needs Allocation and the capacity of roadways, sewer lines, and other infrastructure to handle increased growth.

Policy 2.2: Encourage the development of additional low- and moderate-income housing.

Policy 2.3: Support increased accessibility to existing affordable housing stock.

Policy 2.4: Provide regulatory incentives and increased flexibility in the development approval process to encourage and facilitate the development of affordable single-family, multifamily, and mixed-use housing.

### **Goal 3: Provide a safe and healthy living environment for City residents.**

Policy 3.1: Eliminate potentially unsafe or unhealthy conditions in existing residential development.

Policy 3.2: Encourage the use of alternate energy and resource efficiency.

Policy 3.3: Reduce energy loss due to inferior construction/development techniques.

Policy 3.4: Encourage reduction in energy consumption for commuting to work and other activities.

**Goal 4: Equal opportunities for all residents to reside in the housing of their choice.**

Policy 4.1: Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color, and for special needs groups.

Policy 4.2: Encourage development of accessible housing for all levels of ability through regulatory relief.

Policy 4.3: Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale and rental of housing based on race, religion, or other protected classifications.

## 6 Program Implementation

### *Program 1: Accessory Dwelling Units*

Accessory dwelling units (ADUs) help meet the City's housing needs for all income levels and provide a housing resource for older adults, students, and extremely low-, very low-, low- and moderate-income households. After passage of new State ADU laws effective January 1, 2017, and January 1, 2020, the City applied State standards in evaluating ministerial applications for ADUs and has adopted ordinances consistent with State law. The City will continue to apply regulations from Chapter 10 of the City's Municipal Code, known as the Planning and Zoning Ordinance (Zoning Code), that allow accessory units by right in all residential or mixed-use zoning districts (zones) in accordance with State law.

From 2017 to 2019, three ADUs were permitted and constructed in the City. However, an Interim ADU Ordinance was in place through 2020 to implement the updated State laws, and in January 2021, the City Council adopted the City's current ADU and junior accessory dwelling unit (JADU) ordinance. Relaxed regulations for ADUs and JADUs dramatically increased their production beginning in 2020. Between January 1, 2020, and September 2021, the City's ADU Ordinance resulted in 11 ADUs permitted, and an additional 22 ADU permit applications are currently under City review.

The City's current ADU Ordinance's associated Local Coastal Program (LCP) amendments are currently under review by the California Coastal Commission. The City will continue to work with and encourage the California Coastal Commission to approve recommended edits for final certification. Once the LCP amendments are certified, the City shall submit its ADU Ordinance to the California Department of Housing and Community Development (HCD) for review. The City's current ADU Ordinance contains provisions that go beyond those set forth in State law, and include the following:

- Consistent with State law, the City permits one ADU and one JADU. Alternatively, to offer more flexibility, the City permits two ADUs on a lot with a proposed or existing single-family dwelling.<sup>2</sup>
- The City permits ADUs for existing multifamily dwelling units, consistent with State law. In addition, the City permits one ADU on a lot with a newly constructed multifamily development.<sup>3</sup>

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of ADUs and JADUs to be developed within the RHNA projection period. The full analysis in **Appendix E, Sites Analysis and Inventory**, used the trends in ADU construction since January 2018 to estimate new production; however, this only accounts for the effect of new laws without taking into account the local program the City will adopt to incentivize and promote the creation of

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<sup>2</sup> ADUs on Lots with a Single-Family Residence. A maximum of two total ADUs shall be allowed on a lot with a proposed or existing single-family dwelling within all Area Districts; however, only one ADU shall be allowed on a property that also has a JADU. Only one detached ADU is allowed on a property (Manhattan Beach Municipal Code Section 10.74.040).

<sup>3</sup> ADUs on Lots with New Multi-Family Developments. In all Area Districts, one ADU shall be allowed on a lot with a newly constructed multi-family development (Manhattan Beach Municipal Code Section 10.74.040).

ADUs, and the recent ADU Ordinance adopted in January 2021. Based on the local incentives, ADU and JADU trends since January 2018, recent sharp upward trends in 2021, and permits currently under City review, a conservative estimate of the number of units to be produced under this approach is an average of 10 ADUs each year during the projection period (see **Appendix E** for the full Accessory Dwelling Unit Projection analysis).

The Community Development Department reviews and approves ADU entitlements and tracks the timely review of ADU applications and building permits issued. The Community Development Department collects data annually on planning entitlements and building permits for ADUs for the Housing Element Annual Progress Report, and will continue to do so per the ADU projection assumptions in the Sites Inventory (see **Program 19, No Net Loss**, for objectives and timelines tied to ADU monitoring).

Under Assembly Bill (AB) 671 (2019), local agencies must include a plan in their Housing Element to incentive and promote the creation of ADUs that can be offered at affordable rent for very low-, low-, or moderate-income households. As such, a primary objective of this Accessory Dwelling Unit Program is to promote the development of housing units for lower-income persons or households. To comply with AB 671 and support the goal of permitting an average of 10 ADUs annually, including ADUs affordable to extremely low-, very low-, low-, and moderate-income households, the Community Development Department will develop tools to streamline the approval process and market ADU construction. These public engagement and information tools may include information packets on the entitlement process, a dedicated web page including a step-by-step guide of the entitlement process, preparation of Frequently Asked Questions (FAQs) for distribution at the planning counter or community meetings, and other engagement tools.

As part of **Program 19, No Net Loss**, the City will review the ADU trends to date at the planning cycle mid-point (by November 2025), and determine if the City is on track to achieve the annual average goal of 10 building permits issued for ADUs. If the City is not on track and there is not an appropriate buffer of sites to make up for the difference as fully explained in **Program 19**, the Community Development Department will further review and develop additional incentives and review and reallocate existing staffing resources as needed to achieve its goal. Additional incentives may include direct outreach mailings to property owners, technical assistance, and financial assistance.

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>• Coordinate with the California Coastal Commission for the current ADU Ordinance’s associated LCP Amendments. Following final certification of LCP amendments, submit the ADU Ordinance to HCD for review.</li> <li>• Amend the ADU Ordinance if needed to conform to future amendments to State law and submit to HCD. Process LCP Amendments as required.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Develop public engagement and informational tools to streamline the approval process and market ADU/JADU construction, including ADUs affordable to lower- and moderate-income households, to achieve an annual average goal of 10 building permits issued for ADUs. These tools may include information packets on the entitlement process, a dedicated web page including a step-by-step guide of the entitlement process, preparation of Frequently Asked Questions (FAQs) for distribution at the planning counter or community meetings, and other engagement tools.</li> <li>• Based on the results of the planning cycle mid-point review of ADU trends to be completed as part of <b>Program 19, No Net Loss</b>, review and develop additional incentives to encourage ADU/JADU development if needed. Additional incentives may include outreach to property owners, technical assistance, and financial assistance.</li> <li>• Issue building permits for an average of 10 ADUs annually.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Submit ADU Ordinance and future amendments to HCD for review within 60 days of final certification of associated ADU amendments to the LCP by the California Coastal Commission.</li> <li>• Annual monitoring of ADU programs.</li> <li>• Develop public engagement and informational tools for ADU/JADUs incentive program by January 2024.</li> <li>• Based on the planning cycle mid-point review to be completed by November 2025 as part of <b>Program 19, No Net Loss</b>, adopt additional incentives to encourage ADU/JADU development by June 2026.</li> <li>• Ongoing tracking of ADU permits issued throughout the planning period and reported annually.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 4.1
<b>Relevant Programs</b>	Program 19: No Net Loss

*Program 2: Adequate Sites*

As fully analyzed in **Appendix E, Sites Analysis and Inventory**, the City has a remaining lower-income RHNA of 406 units for the 6th Cycle planning period. The City will establish an overlay district that encompasses a minimum of 20.3 acres of sites selected from **Table 15, Potential**

**Underutilized Sites for Overlay**, of **Appendix E, Sites Analysis and Inventory**, in the General Commercial (CG) and Planned Development (PD) Districts to accommodate the remaining lower-income RHNA of 406 units. The acreage needed is assumed using a realistic capacity of 20 dwelling units per acre, based on the minimum density requirements outlined below.

Pursuant to State law, the overlay district’s standards adopted as part of the Adequate Sites Program to address the RHNA shortfall will adhere to the following components of Government Code sections 65583.2 (h) and (i):

- Sites must accommodate 100 percent of the shortfall for very low- and low-income units.
- Sites must allow a minimum of 16 units per site.
- Sites must permit a minimum of 20 dwelling units per acre.
- Sites must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.
- Sites must permit owner-occupied and rental multifamily uses by right pursuant to Government Code Section 65583.2(i)<sup>4</sup> for developments in which 20 percent or more of the units are affordable to lower-income households.

The allowable densities for residential redevelopment in the overlay district will range from a minimum density of 20 dwelling units per acre, consistent with State law, to a maximum density of at least 30 dwelling units per acre. The City will ensure that the development standards that result from the planning process will be carefully crafted such that they will not prevent or prohibit the provision to facilitate development at the maximum densities allowed under the overlay. Any residential development standards in the overlay district will not preclude the minimum densities or requirements of State law outlined above, creating the opportunity for several hundred residential units on sites that previously only permitted commercial uses. As reflected in **Appendix E**, each site identified as a potential site for the Adequate Sites Program’s overlay has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.

In addition, the City commits to rezoning an additional 3.65 acres of sites to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. The City will ensure that the sites are rezoned at densities deemed appropriate to accommodate housing for lower-income households as defined by Government Code Section 65583.2(c)(3)(B). This will provide a buffer of at least 73 units of multifamily housing (see **Appendix E, Sites Analysis and Inventory**, for a full discussion related to rezoning to create a buffer).

<b>Objective</b>	<ul style="list-style-type: none"> <li>• Establish overlay district adhering to the standards set forth in Government Code sections 65583.2 (h) and (i) to address</li> </ul>
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<sup>4</sup>. With the definition in Government Code Section 65583.2 (i), “by right” shall mean that the local government's review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a “project” for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code .

	<p>shortfall and create opportunity for at least 406 units of multifamily housing for lower-income households.</p> <ul style="list-style-type: none"> <li>• Rezone to provide a buffer of at least 73 units of multifamily housing for lower-income households, above and beyond the capacity required for lower-income sites.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Pursuant to the requirements as set forth in AB 1398 (2021), the City will rezone by February 2025 <sup>5</sup> to accommodate the lower-income shortfall of 406 units.</li> <li>• Rezone by February 2025 to accommodate the lower-income buffer of 73 units.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 4.1

*Program 3: Affordable Housing Streamlining*

The City currently allows concurrent processing of all discretionary applications for a project, thereby streamlining the development process. The City will continue to offer concurrent processing of all discretionary applications for a project and inform developers of the opportunity for concurrent processing.

As detailed in **Programs 11 and 18**, the City has a streamlining process in place specifically for multifamily housing in residential zones. Multifamily housing developments in residential zones (Medium-Density Residential District [RM], High-Density Residential District [RH], and Residential Planned Development District [RPD]) with fewer than six units are permitted by-right. Projects with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan approved by the Director.

To minimize constraints to the development of affordable housing that may result from discretionary permitting procedures, the City will amend Chapter 10.84 (Use Permits, Variances, Minor Exceptions, Precise Development Plans and Site Development Permits) of the Zoning Code to ensure Precise Development Plan applications are subject only to an administrative non-discretionary approval process.

Through the removal of discretionary requirements, multifamily developments in the mixed-use zones will also be eligible for streamlined processing (see **Program 18 for full program details**, including objectives and timelines, related to the removal of discretionary requirements and streamlined processing for multifamily housing in the CL, CD, and CNE zones).

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<sup>5</sup> For a local government that fails to adopt a housing element within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, the rezone, shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.

To further assist in the development of housing for extremely low-, very low-, low-, and moderate-income households, the City provides an affordable housing streamlined approval process in accordance with State requirements for qualifying development proposals that provide affordable units under Senate Bill (SB) 35 streamlining.<sup>6</sup> The City annually reports on affordable housing streamlining applications in the Housing Element Annual Progress Report. The City will revise internal permitting procedures to ensure that staff has clear procedures for responding to proposals for SB 35 streamlining and for prioritizing qualifying SB 35 housing developments consistent with State law.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Continue to offer concurrent processing of all discretionary applications for a project.</li> <li>• Amend Zoning Code to ensure a non-discretionary approval process for Precise Development Plan applications.</li> <li>• Process proposals for SB 35 permit streamlining consistent with State law.</li> <li>• Develop internal staff procedures to assist staff in responding to SB 35 proposals and permit streamlining.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing concurrent processing of all discretionary applications for a project throughout the Housing Element planning period.</li> <li>• Amend the Zoning Code to ensure a non-discretionary approval process for Precise Development Plan applications and related LCP Amendments by August 2023.</li> <li>• Ongoing SB 35 processing throughout the Housing Element planning period and report annually.</li> <li>• Develop staff assistance materials by January 2023.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.2, 2.3, 2.4, 4.2
<b>Relevant Programs</b>	Program 11: Density Bonus Program 18: Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts

<sup>6</sup> Under Government Code Section 65913.4 (commonly referred to as “SB 35”), multifamily housing developments that satisfy objective planning standards—among other requirements—may be approved through a streamlined, ministerial approval process in certain jurisdictions, including the City of Manhattan Beach. Developments approved through the streamlined approval process are not subject to a Conditional Use Permit or to the California Environmental Quality Act (CEQA).



**Program 4: Affordable Senior Housing Preservation**

The Manhattan Village Senior Villas, located at 1300 Park View Avenue, was first occupied in 1997. This project consists of 104 senior housing apartments. As a condition of the project’s approval, and as part of a settlement agreement upon sale of the property, 20 percent of the units must be reserved for very low-income households, 20 percent must be reserved for low-income households, and 40 percent of the units must be reserved for moderate-income households in perpetuity. The remaining 20 percent of the units may be rented at market rate. The occupants of the senior housing project must consist of a householder 62 years of age or older, or 55 years of age or older for persons with disabilities, according to criteria established by the Americans With Disabilities Act (ADA) of 1990 or the Federal Rehabilitation Act of 1973. This program is concerned with ensuring that the current affordability of the project is being maintained.

Although the project’s affordability agreement with the City does not expire, and the components of affordability are preserved via a deed restriction that runs with the land, the City should make contact with the owners of the Manhattan Village Senior Villas and continue to monitor and enforce affordability throughout the planning period. In addition, the City should identify qualified affordable housing developers and local non-profits as potential purchasers/managers of affordable housing units as a proactive measure.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Contact and meet with property owners of project.</li> <li>• Monitor affordability throughout the planning period.</li> <li>• Create and maintain list of non-profit organizations as potential purchasers/managers of affordable housing units.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Contact and meet with property owners of project by January 2023 and again mid-cycle by January 2026.</li> <li>• Biannually update list of non-profit and affordable housing developers starting January 2023.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.3, 1.4, 2.3, 4.1

**Program 5: Americans with Disabilities Act (ADA) Improvements Program**

The Community Development Block Grant (CDBG) Program provides for the development of viable urban communities by providing decent housing, a suitable living environment, and expanded economic opportunities primarily for lower- and moderate-income residents, as well as older adults and people with disabilities. Eligible activities under the CDBG Program include activities related to housing, other real property activities (code enforcement, historic preservation), public facilities, activities related to public services, activities related to economic development, and assistance with community-based development organizations. CDBG funds

may be used for the acquisition, construction, reconstruction, rehabilitation, or installation of certain public improvements or public facilities.

Since 2016, the City has used its annual CDBG allocation for infrastructure improvements, specifically installation of ADA-compliant curb ramps throughout City intersections. Most recently (as of Fiscal Year 2018), CDBG funds were allocated to the implementation of the Manhattan Senior Villas ADA Pathway Project. These efforts supported the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, curb ramp, and gutter to create unobstructed paths of travel and accessibility for older adults and residents with disabilities to Manhattan Senior Villas, located at 1300 Parkview Avenue. Construction is anticipated to begin this year (2021). The City will ensure that the Manhattan Senior Villas ADA Pathway Project is completed by 2023 to increase accessibility for older adults and people with disabilities in the City. Following completion of the Senior Villas ADA Pathway Project, the City will use future CDBG funds for additional ADA improvements focused on bringing existing, non-compliant ramps into ADA compliance at various locations throughout the City, as identified by the Public Works Department. These improvements will increase accessibility for people with disabilities throughout the City.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Complete ADA-compliant infrastructure improvements as part of the Manhattan Senior Villas ADA Pathway Project.</li> <li>• Construct ADA-compliant concrete access ramps at various locations throughout the City, contingent upon future CDBG funding.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Complete Manhattan Senior Villas ADA Pathway Project infrastructure improvements by January 2023.</li> <li>• Annual allocation of CDBG funding to ADA-compliant improvements during the planning period, as funding is available.</li> </ul>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>• Public Works Department</li> <li>• Community Development Department</li> </ul>
<b>Funding Sources</b>	CDBG Funds
<b>Relevant Policies</b>	2.3, 3.1, 4.1, 4.3

**Program 6: Annual Progress Reports**

The City will continue to report annually on the City’s progress toward its 8-year RHNA housing production targets and toward implementation of the programs identified in the Housing Element. Further, the City will identify and prioritize State and local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports (AB 1255, 2019; AB 1486, 2019; AB 879, 2017).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Report to HCD annually on progress made toward the Housing Element.</li> <li>• Report to the City Council annually on Housing Element progress.</li> </ul>
<b>Timeframe</b>	Annually reporting throughout the planning period.
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	2.1, 2.2, 2.3

*Program 7: By-Right Development*

The City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified in the Sites Inventory to accommodate the lower-income RHNA that were previously identified in past Housing Elements in accordance with the specifications of Government Code Section 65583.2(c) and Housing Element law. Specifically, three nonvacant parcels (Assessor's Parcel Number 4137-001-900, 4170-026-003, and 4170-026-004 in Lower-Income Sites 1 and 2) identified in the Sites Inventory to accommodate the lower-income RHNA were identified in a prior housing element.<sup>7</sup> As such, Sites 1 and 2, as identified under the column "Table ID" in **Table 7, Lower-Income Sites Identified**, of **Appendix E**, will allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

<b>Objective</b>	Permit development by-right on qualifying sites identified to accommodate the lower-income RHNA that were identified in previous Housing Elements in accordance with State law.
<b>Timeframe</b>	Amend the MBMC by August 2023 to permit by-right development on sites previously identified in past Housing Elements in which at least 20 percent of the units are affordable to lower income households in accordance with the specifications of Government Code Section 65583.2(c)
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department Budget
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.4

<sup>7</sup> See the Electronic Housing Element Site Inventory Form included as Exhibit A in Appendix E, Sites Analysis and Inventory, for a complete list of parcels identified in the Sites Inventory.

**Program 8: Code Compliance**

The City has an active code enforcement program that responds to complaints of substandard structures. A Report of Residential Building Records is required each time a property is sold, which serves to alert all parties to unpermitted and potentially substandard construction that may exist. The City will continue the active code enforcement program for illegal and substandard units.

Code enforcement staff accepts reports of possible code enforcement violations and responds directly to violations related to compliance with the Manhattan Beach Municipal Code (MBMC), including zoning, property maintenance, illegal dwelling units, trash container regulations, and sign violations. Possible violations regarding substandard, nonstructural housing issues are referred to the Environmental Health Division of the Los Angeles County Department of Public Health. The County of Los Angeles Environmental Health Division is responsible for ensuring that residential housing is safe, sanitary, and fit for human habitation. This is accomplished through routine Inspections of rental properties with five and or more units, and investigations of complaints. From July 2016 to July 2021, the County of Los Angeles performed 52 inspections in the City of Manhattan Beach.

The City’s website clearly provides code enforcement resources and technical assistance to residents. Residents can report a violation, and access educational and technical resources on substandard housing, the City’s code enforcement efforts, the violation process and timeline, and directly access the County of Los Angeles Public Health Online Form for substandard housing complaints.

The City will continue to ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources.

<b>Objectives</b>	<ul style="list-style-type: none"><li>• Continue requiring a Report of Residential Building Records.</li><li>• Through the complaint-driven inspections, Code Enforcement will make property owners aware of current resources on the City website to assist with the remediation of violations.</li><li>• Continue referrals to the County of Los Angeles Environmental Health Division to facilitate approximately 55 inspections throughout the planning period.</li><li>• Maintain code enforcement and substandard housing resources up to date and ensure they are easily accessible to all residents, including extremely low-, very low-, low- and moderate-income households.</li></ul>
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<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing; annually throughout the planning period.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.3, 1.4, 3.1, 3.2, 3.3, 4.1, 4.3

**Program 9: Countywide Affordable Home Ownership Program**

The Home Ownership Program (HOP) is administered by the Los Angeles County Development Authority (LACDA). This program provides funding to lower-income households looking to purchase a home through down payment and closing costs assistance for single-family homes, condominiums, and townhomes. The HOP loan provides a second mortgage loan for first-time homebuyers with an assistance amount of up to \$85,000, or 20 percent of the purchase prices, whichever is less, and offers 0 percent interest loans. Participant’s income must not exceed 80 percent of the County Median Income based on the number of persons in the household. Properties must be located in cities participating in the HOP, which includes Manhattan Beach. The City will advertise program availability on the City’s website and at the planning counter.

<b>Objectives</b>	Advertise HOP on the City’s website and for distribution at the planning counter.
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Program information will be posted online and made available at the planning counter by March 2023.</li> <li>• Relevant information on the City website and planning counter will be updated annually, starting March 2024, if there are any changes to the County HOP.</li> </ul>
<b>Responsible Agency</b>	LACDA: Program Funding; Community Development Department: Staff time for program advertisement and website updates.
<b>Funding Sources</b>	Los Angeles County HOME Allocation; City General Fund: Staff time.
<b>Relevant Policies</b>	2.3, 4.1

**Program 10: Countywide Affordable Rental Housing Development**

This program is administered by the Los Angeles County Development Authority (LACDA). This program provides financial assistance to developments located in cities participating in the Los Angeles Urban County Program, including the City of Manhattan Beach. This program supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles.

Projects funded through this program are expected to help combat homelessness, meet the housing needs of their communities, provide local economic development opportunities during construction, and assist in the alleviation of any local blighting conditions. This program provides financial and technical assistance to acquire sites, develop affordable rental housing, and acquire and rehabilitate affordable rental housing. Technical assistance and funding for pre-development activities may also be provided for nonprofit housing developers participating in specific projects. The funds are made available as low-interest long term loans. Funds for the program are administered through a Notice of Funding Availability (NOFA) issued by LACDA. All units developed utilizing these resources are made available to households earning less than 50% of the median area income.

The City will advertise the availability of this additional source of funds to support in the development of rental housing. Program availability will be advertised on the City's website and at the planning counter.

Further, the City will increase coordination and collaboration with the LACDA to promote Manhattan Beach as a City that supports affordable housing development and as an ideal candidate for the allocation of funding for affordable housing.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Post program information on the City's website and for distribution at the planning counter.</li> <li>• Increase Coordination with the LACDA with regular contact.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Program information will be posted online and at the counter by March 2023.</li> <li>• Coordination will be ongoing throughout the planning period through biannual contact beginning June 2023.</li> </ul>
<b>Responsible Agency</b>	Los Angeles County Community Development Commission; Community Development Department for program advertisement and coordination efforts.
<b>Funding Sources</b>	HOME funds and CDBG allocations, Tax Exempt Multi-Family Revenue Bond, and other County funding sources.
<b>Relevant Policies</b>	1.2, 1.4, 2.2, 4.2

*Program 11: Density Bonus*

State Density Bonus Law requires a local jurisdiction to grant an increase in density, if requested by a developer, for providing affordable housing as part of a development project. Developers in the City use State Density Bonus Law, and the City has a standard application and review procedure for processing density bonus applications as part of housing development applications (MBMC Section 10.94.050, Administration). As of September 2021, there are currently two projects

in the City’s residential project pipeline (see full discussion in **Appendix E**) that will use an increase in development density in exchange for setting aside a percentage of the units as affordable housing.

The City incentivizes development of affordable housing by abiding by the local and State density bonus regulations. In addition, to further incentivize affordable units, multifamily projects in residential districts that qualify for a density bonus are eligible for a streamlined approval process, as described in **Programs 3 and 18**.

Government Code Section 65915 requires that a jurisdiction adopt a local Density Bonus Ordinance consistent with State law. To satisfy this requirement, the City will review and amend the local Density Bonus Program Ordinance to ensure consistency with State requirements, including the provision of a bonus for student affordable housing, senior housing, and permitting up to an 80 percent bonus for 100 percent affordable developments (see amendments needed in **Appendix C, Constraints and Zoning Analysis**).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Update Density Bonus Ordinance, consistent with State law.</li> <li>• Ensure the City’s Density Bonus Ordinance is consistent with future amendments to State Density Bonus Law and case law. Process related LCP Amendments as required.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Amend the Density Bonus Ordinance by March 2023.</li> <li>• Ongoing monitoring of future amendments to State Density Bonus Law.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.4, 3.4, 4.2
<b>Relevant Programs</b>	Program 3: Affordable Housing Streamlining Program 18: Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts

*Program 12: Developer Outreach and Transparency*

The City will actively work with the development community to identify ways that lower-income housing may be provided, including housing for extremely low-income households and those with special housing needs. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households. Another outreach effort will inform the development community and property owners about development opportunities for ADUs.

The City will maintain current information on the City’s website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions,

applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports, consistent with the requirements of AB 1483 (2019).

<b>Objective</b>	Maintain relevant development checklist of materials and other information on the City’s website as detailed above and in AB 1483 (2019).
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Update relevant information that is applicable for housing development project proposal requirements within 30 days of any changes, consistent with AB 1483 (2019).</li> <li>• Ongoing throughout the planning period.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 4.1

**Program 13: Energy Conservation and Energy Efficiency Opportunities**

Manhattan Beach has a long history of environmental leadership, policy, and stewardship, both as a community and as a city government. Under the City’s adopted Environmental Work Plan priorities, adopted Strategic Plan goals, and in compliance with State and General Plan mandates, the City is creating a Climate Resiliency Program, called Climate Ready Manhattan Beach (Climate Ready MB). The Climate Ready MB program includes completing a Sea Level Rise Vulnerability Assessment; creating a Climate Action and Adaptation Plan; and updating the City’s Local Coastal Program–Land Use Plan, Local Hazard Mitigation Plan, and General Plan.

The City is currently working on the Sea Level Rise Risk, Hazards, and Vulnerability Assessment, which will inform the development of the Climate Action and Adaptation Plan, and related Local Coastal Program–Land Use Plan updates. To protect the City’s coastline and infrastructure and comply with State mandates, the City is also identifying other local climate change impacts that could occur. As outlined in the Climate Ready MB program, the City will develop strategies to increase the community’s resilience to climate change impacts and cut carbon emissions.

In addition, the City has adopted the 2019 California Green Building Standards Code, which includes energy efficiency, water efficiency and conservation, and material conservation and resource efficiency standards to integrate sustainable development and reduce residential and nonresidential building energy use. The City anticipates State Green Building Codes being updated in the next 2 years, at which point the City will also update City regulations, as detailed in **Program 31, Water Conservation and Green Building Standards**.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Adopt Climate Action and Adaptation Plan and related Local Coastal Program–Land Use Plan updates.</li> <li>• Review green building techniques in the MBMC to ensure compliance with State requirements.</li> </ul>
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<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Adopt Climate Action and Adaptation Plan and submit Local Coastal Program–Land Use Plan updates to California Coastal Commission by 2023.</li> <li>• Ongoing review of City codes to integrate energy efficient building techniques throughout the planning period.</li> </ul>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>• Community Development Department</li> </ul>
<b>Funding Sources</b>	City General Fund and California Coastal Commission LCP Grant and California Climate Investments
<b>Relevant Policies</b>	1.3, 3.1, 3.2, 3.3, 3.4

**Program 14: Fair/Equal Housing Program**

This City Fair/Equal Housing Program is designed to promote equal housing opportunities in Manhattan Beach. The City recognizes the effect that discrimination has in limiting housing choice and equal opportunity in renting, selling, and financing housing. In accordance with Government Code Section 8899.50 (b)(1), the City administers its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and takes no action that is materially inconsistent with its obligation to affirmatively further fair housing. The City contracts with the Housing Rights Center, a nonprofit organization that helps educate the public about fair housing laws and to investigate reported cases of housing discrimination. The Housing Rights Center provides free services, including landlord/tenant counseling, outreach and education, and discrimination investigations. The City offers fair housing information and referrals upon request. The City will continue referral services and contracting fair housing services with the Housing Rights Center, and will work to provide this information and will provide links to additional fair housing resources on the City’s website.

Additionally, the City will take the following steps to affirmatively further fair housing during the planning period:

- The City will continue to support and participate in the Regional Analysis of Impediments to Fair Housing Choice in coordination with the Community Development Commission of the County of Los Angeles and the Housing Authority of the County of Los Angeles.
- The City will promote compliance with housing discrimination laws by developing a handout for developers to be made aware of fair housing advertisement material requirements related to the sale or rental of housing pursuant to Government Code Section 12955, which prohibits advertisement materials from indicating a preference or limitation based on a protected classification.
- The City will administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing by developing a process that prompts the consideration of fair housing in the decision process. This process could include a requirement to have a statement of fair housing consideration on all decision letters or staff reports, whichever is applicable.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Support and engage in the Regional Analysis of Impediments to Fair Housing.</li> <li>• Post fair housing information on the City’s website.</li> <li>• Develop a handout for developers to be made aware of fair housing advertisement material compliance and make publicly available.</li> <li>• Implement a procedure that prompts fair housing administration for housing and community development decisions.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing engagement throughout the planning period with updated Regional Analysis of Impediments to Fair Housing every 5 years.</li> <li>• Website information and developer handout to be posted and made available by January 2023.</li> <li>• Develop fair housing administration procedure by March 2023.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.3, 3.1, 4.1, 4.2, 4.3

*Program 15: Housing Choice Voucher Program*

An important element of the City’s strategy in providing housing opportunities for extremely low-income and low-income households is the Section 8 Housing Choice Voucher Program, a program offering tenant-based assistance subsidized by the Federal government for very low-income families, older adults, and persons with disabilities. Decent, safe, and sanitary housing units are provided to households through rental vouchers. Participants find their own rental housing in the open market and pay a portion of their income toward rent. The Los Angeles County Development Authority subsidizes the balance of the monthly rent in direct payments to the owner through funding received by the U.S. Department of Housing and Urban Development.

The Redondo Beach Housing Authority locally administers the Housing Choice Voucher Program for Manhattan Beach. Currently, there are five Section 8 Vouchers administered in the City. The City will continue to participate in the Los Angeles County Development Authority program, coordinate with the Redondo Beach Housing Authority, and publicize availability of Section 8 rental assistance for households in the City by enhancing the City’s website with information.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Continue to support the provision of five vouchers annually to facilitate rent subsidies for very low- and extremely low-income residents.</li> </ul>
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	<ul style="list-style-type: none"> <li>Enhance City website with information related to the Housing Choice Voucher Program.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Annually throughout the planning period.</li> <li>Update City website by January 2023.</li> </ul>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>Los Angeles County Development Authority</li> <li>Community Development Department</li> </ul>
<b>Funding Sources</b>	Federal Section 8 funds
<b>Relevant Policies</b>	1.4, 2.3, 4.1, 4.3

**Program 16: Lot Consolidation Incentive**

The City already provides an additional density bonus incentive under Section 10.12.030 of the MBMC above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus. The incentive is granted in exchange for lot consolidation, in accordance with the following formula:

Combined Parcel Size	Base Density Increase*
Less than 0.50 acres	No increase
0.50 acres to 0.99 acres	5% increase
1.00 acre or more	10% increase
* Excluding density bonus	

As shown in the table above, and in accordance with MBMC Section 10.12.030, multifamily developments meeting the minimum requirements are currently granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.50 acres to 0.99 acres through the existing lot consolidation bonus incentive. However, to specifically incentivize affordable housing, including housing for extremely low- and very low-income households, and reach the City’s housing target for the 6th Cycle planning period and incentivize small lot development, the City will expand the current lot consolidation incentive for sites that have been identified in the Sites Inventory.<sup>8</sup> See the Electronic Housing Element Site Inventory Form included as **Exhibit A of Appendix E, Sites Analysis and Inventory**, for a complete list of parcels identified in the Sites Inventory. Sites identified in the Sites Inventory will be granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.30 acres to 0.49 acres.

In addition, the City will continue to facilitate consolidation and development of small parcels through the following actions:

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<sup>8</sup> See Tables 7, 8, 9, 15 and 16 in Appendix E, Sites Analysis and Inventory, for additional parcel details.

- Publicize the lot consolidation program on the City's website, at the Planning counter, and by notice to affordable housing providers.
- Assist affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database.
- Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Publicize the program on the City's website, at the Planning counter, and by notice to affordable housing providers.</li> <li>• The City will assist affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database.</li> <li>• Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.</li> <li>• Amend Section 10.12.030 of the MBMC to provide a lot consolidation bonus incentive for sites between 0.30 acres to 0.49 acres identified in <b>Exhibit A, Electronic Housing Element Site Inventory Form, of Appendix E.</b></li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Develop promotional material to publicize program and update City's GIS system and property database by February 2024..</li> <li>• Dedication of staff time and technical assistance, including assisting affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database, ongoing throughout the planning period.</li> <li>• Ongoing expedited processing and fee waivers for lot consolidations processed concurrently with other planning entitlements throughout the planning period.</li> <li>• Amend Section 10.12.030 of the Zoning Code by August 2023. Process LCP Amendments as required.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 2.4, 4.2

**Program 17: *Manufactured Housing***

As defined in the MBMC, a mobile home is considered a manufactured home, which includes factory-built housing on a permanent foundation. State law requires that the City's Zoning Code permit manufactured housing in the same manner and in the same zone(s) as conventional single-family dwellings in zones that permit single-family dwellings (Government Code Section 65852.3). Although the current Zoning Code includes manufactured homes as a multifamily residential classification, MBMC Section 10.52.100 dictates that manufactured housing is only permitted in residential zoning districts, and is not allowed as an additional unit on an already developed lot or as an ADU on an already developed lot. To comply with State law, the City will amend the Zoning Code to clarify that manufactured housing is treated as a single-family dwelling and is permitted in all of the same zones and same manner as other single-family structures, including in commercial or mixed-use zones.

State law requires that cities and counties allow mobile home parks (including condominium and cooperative parks) on all land planned and zoned for residential land use, provided, however, that a use permit may be required (Government Code Section 65852.7). The MBMC does not currently define mobile home parks; therefore, it also does not identify zoning districts in which this use is permitted. To comply with State law, the City will amend the MBMC to permit mobile home parks on all land zoned or planned for residential land uses. In addition, the City will enforce mobile home park replacement and relocation requirements in accordance with State law (Government Code Section 65863.7).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Amend the MBMC to ensure consistency with State law regarding manufactured homes.</li> <li>• Amend the MBMC to ensure consistency with State law regarding mobile home parks.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Amend the MBMC and submit related LCP Amendment applications by March 2023.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.2, 2.4, 4.1

**Program 18: *Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts***

Under the City's current regulations, multifamily housing developments in residential zones with fewer than six units are permitted. Projects with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan approved by the Director.

Multifamily housing developments in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) Districts are currently permitted through approval of a Conditional Use Permit. To further incentivize affordable housing in the City, the City will remove

the discretionary requirements for multifamily housing in the CL, CD, and CNE zones meeting the minimum requirements for a density bonus. The City will review and amend the Zoning Code to permit residential uses in the CL, CD, and CNE zones without requiring approval of a Conditional Use Permit, and all projects that use the State density bonus will be eligible for streamlined approvals.

Additionally, under Chapter 10.16, Commercial Districts, of the MBMC, portions of a building intended for residential use in a mixed-use project or purely residential developments in mixed-use zones are currently subject to the High-Density Residential District residential standards in Chapter 10.12, Residential Districts, of the MBMC. To minimize constraints to the development of affordable housing, including housing for extremely low- and very low-income households, the City will adopt development standards for multifamily residential and mixed-use projects in the three commercial mixed-use zones (CL, CD, and CNE) instead of deferring to the High-Density Residential standards, which are subject to voter approval for certain amendments to residential development standards.<sup>9</sup> The City will ensure that the adopted standards for residential and mixed-use projects do not reduce the intensity of land use<sup>10</sup> or reduce the site’s residential development capacity, consistent with the Housing Crisis Act of 2019. Through this process, the City will implement **Program 20, Objective Design Standards**, through the development of new objective design standards.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Amend the Zoning Code to remove discretionary requirements and provide streamlined processing for multifamily housing in the CL, CD, and CNE zones for projects that qualify for a density bonus.</li> <li>Adopt development standards for multifamily residential and mixed-use projects in the CL, CD, and CNE zones.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Amend the Zoning Code and related LCP Amendments by August 2023.</li> <li>Streamlining availability to be ongoing throughout the planning period..</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 2.4, 3.4, 4.2

<sup>9</sup> In accordance with Section 10.12.0030, Property development regulations: RS, RM, and RH district, the property development standards for the residential zoning districts, RS, RM and RH, shall not be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions or minimum lot area per dwelling unit, unless the amendment is first submitted to a city-wide election and approved by a majority of the voters.

<sup>10</sup> In accordance with State law, “reducing the intensity of land use” includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site’s residential development capacity.

<b>Relevant Programs</b>	Program 3: Affordable Housing Streamlining Program 11: Density Bonus Program 20: Objective Design Standards
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*Program 19: No Net Loss*

The City will use its development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under SB 166 (2017). The City will develop and implement a monitoring procedure pursuant to Government Code Section 65863, and will make the findings required by that code section if a site is proposed for development with fewer units or at a different income level than shown in the Housing Element.

As part of **Program 2, Adequate Sites**, the City will rezone to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. This will ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period; however, if, at any time during the planning period, a development project results in fewer units by income category than identified in the Sites Inventory (**Appendix E**) for that parcel and the City cannot find that the remaining sites in the Housing Element are adequate to accommodate the remaining RHNA by income level, the City will, within 180 days, identify and make available additional adequate sites to accommodate the remaining RHNA.

Furthermore, as outlined in **Program 1, Accessory Dwelling Units**, the City reviews and approves ADU entitlements and tracks the timely review of ADU applications and building permits issued. The Community Development Department collects data annually on planning entitlements and building permits for ADUs for the Housing Element Annual Progress Report. As part of this program, the Community Development Department commits to continue monitoring the development of ADU’s, including affordability. Specifically, the Community Development Department will continue using its development permit database to monitor the development of ADU’s per the ADU projection assumptions in the Sites Inventory (see **Appendix E** for the full Accessory Dwelling Unit Projection analysis). The City will compare the number of planning entitlements and building permits for ADUs each year compared to the average of 10 ADUs projected annually during the projection period per the ADU projection assumptions in the Sites Inventory. The City will check the annual ADU trends at the planning cycle mid-point (October 15, 2025), if the City finds that the ADU production does not keep pace with the ADU assumptions toward the RHNA, and that there is not an appropriate buffer of sites remaining to account for the deficit of projected lower- or moderate-income ADUs, the City will identify additional sites within six months. If the City finds that the ADU production does not keep pace with the ADU assumptions, the City will also review and streamline permitting procedures and review and reallocate existing staffing resources as needed to achieve its goal as part of **Program 1, Accessory Dwelling Units** (See **Program 1** for objectives and timelines tied to ADU incentives).

For example, if the City averaged 5 ADUs annually for a total of 21 ADUs, including 14 affordable to lower- or moderate-income households, between the start of the 6th RHNA projection period, (June 30, 2021) and the planning cycle mid-point (October 15, 2025), compared to the average of 10 ADUs projected annually per the Sites Inventory’s ADU assumptions, then the City would find that ADU production in the City was not keeping pace with the ADU assumptions toward the RHNA. In this example, the City would be approximately 22 total units behind the ADU assumptions of approximately 43 ADUs by the planning cycle mid-point, including approximately 15 ADUs affordable to lower- or moderate-income households. If the City could not find that the remaining buffer sites (see details related to buffer sites in **Program 2, Adequate Sites**) were adequate to accommodate the 15 unit difference in the projected number of ADUs affordable to lower- or moderate-income households to be permitted by the planning cycle mid-point and the actual number of ADUs permitted, then the City will identify additional sites within six months. An example table has been provided below.

<b>Projected Versus Actual ADUs for Planning Cycle Mid-Point: June 30, 2021 – October 15, 2025</b>				
Income Level	Percent of ADUs	Projected ADUs for 6th RHNA Projection Period <sup>1</sup>	Projected ADUs for Planning Cycle Mid-Point (4.3 years) 6/30/21-10/15/25	Actual Number of ADUs Permitted Between 6/30/21-10/15/25
Lower-Income	60%	50	26	
Moderate-Income	6%	5	3	
Above Moderate-Income	34%	28	14	
Total	100%	83	43	

Source: SCAG Regional Accessory Dwelling Unit Affordability Analysis, 2020

1. 6th RHNA Projection Period (8.3 years): June 30, 2021 – October 15, 2029  
ADU = accessory dwelling unit

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Amend staff procedures to ensure all development proposals and rezone proposals are reviewed against the capacity identified for sites in the Sites Inventory (<b>Appendix E</b>).</li> <li>Develop a methodology for tracking remaining capacity and monitor all development activity, proposed rezones, and identified capacity as it compares to the remaining RHNA target throughout the cycle. Any site identified to be upzoned to meet “no net loss” requirements will satisfy the adequate site requirements of Section 65583.2 and will be consistent with the City’s obligation to affirmatively further fair housing.</li> <li>Monitor the development of ADUs per the ADU projection assumptions in the Sites Inventory (<b>Appendix E</b>) and collect and report data for the Housing Element Annual Progress Report.</li> <li>Check annual ADU trends to date at the planning cycle mid-point (October 15, 2025) and identify additional lower-</li> </ul>
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	<p>and moderate-income sites if the ADU production does not keep pace with the ADU assumptions toward the RHNA.</p> <ul style="list-style-type: none"> <li>Review each housing approval on sites listed in the Housing Element and make findings required by Government Code Section 65863 if a site is proposed with fewer units or a different income level than shown in the Housing Element.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Amend staff procedures and develop a methodology for tracking capacity by March 2022.</li> <li>Ongoing monitoring the development of ADU's using the City's development permit database and report ADU trends annually through the Housing Element Annual Progress Report.</li> <li>Check annual ADU trends to-date by November 2025. Identify additional sites by June 2026 if ADU production does not keep pace with the ADU assumptions toward the RHNA and there is not an appropriate buffer remaining.</li> <li>Ongoing tracking of sites throughout the planning period and make additional sites available within 180 days in the event that a capacity shortfall occurs.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 1.4, 2.1, 2.2
<b>Relevant Programs</b>	Program 1: Accessory Dwelling Units Program 2: Adequate Sites

*Program 20: Objective Design Standards*

The City will increase transparency and certainty in the development process through objective design standards. Any new design standards developed and imposed by the City shall be objective without involvement of personal or subjective judgement by a public official, and shall be uniformly verifiable by reference to the City's regulations in accordance with the requirements of the Housing Crisis Act of 2019 (SB 330, 2019) and related State housing law.

<b>Objective</b>	Monitor Zoning Code amendments to ensure any new design standards are objective.
<b>Timeframe</b>	Ongoing throughout the planning period, as new design standards are being drafted.
<b>Responsible Agency</b>	Community Development Department

<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	1.2, 2.2, 2.4, 3.1, 4.2

**Program 21: Older Adults Programs**

The City provides various services for the special needs of older adults so that they may remain in the community. The older adults of the community regularly rely on these resources for services and programming. The Older Adults Program provides services to predominantly lower-income older adults, including those with extremely low-incomes, and provides some services for residents with disabilities (all ages).

This program is operated by a part-time Older Adults Program Manager who is contracted through the Beach Cities Health District and the City of Manhattan Beach Fire Department. At any given time, the Older Adults Program may assist up to 100 older adults, of whom 70 percent are lower-income. As liaison and service coordinator, the Older Adults Program Manager performs the following functions:

1. Locates suitable (often more affordable) housing. This may include referrals to “board and care” residential facilities in Manhattan Beach, or multifamily apartments.
2. Identifies financial assistance resources, including U.S. Housing and Urban Development’s Section 8 rental vouchers through the County of Los Angeles, and other Federal assistance programs, as well as disbursing information and referring to lenders for special mortgage programs.
3. Coordinates Rotary Cares, a volunteer program that rehabilitates two senior homes per year, consisting of minor repairs, plumbing, carpentry, painting, and other improvements.
4. Arranges and makes referrals for health and personal services for the Senior Health Program, which is funded by the Beach Cities Health District’s Community Care Services and other community resources available for older adults.

The City also provides funds for social service groups serving older adults, including the Salvation Army’s Brown Bag Food Program, Care Management for Manhattan Beach Seniors, and South Bay Adult Care Center. Additionally, the City’s Parks and Recreation Department has a full-time Older Adults Program Supervisor, plus support staff, who provides numerous services and programs to older adults, including arts and crafts, drama, acting, poetry, and fitness classes; softball leagues; and bingo nights. In addition, the City provides the Manhattan Beach Dial-A-Ride services, which is a shared ride, curb-to-curb bus service for Manhattan Beach residents who are 55+ years old or who have disabilities (all ages) to assist them with things such as picking up medication, doctor visits, and groceries.

The City is also providing temporary technical assistance to older adults by helping older adults with changes resulting from the Clean Power Alliance program, an electricity supply provider offering renewable energy at competitive rates to the community, and with managing changes to their energy bills. The City also provides links and information on its website to resources

provided by Clean Power Alliance, which include financial assistance programs for lower-income people and people with special needs.

Additionally, the City recently approved an assisted living project for older adults in 2021, consisting of 95 rooms (115 total beds), a facility kitchen, and common areas (foyer, parlor, bistro, private dining room, general dining rooms, activity rooms, and staff rooms). The project will include 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss. The project is expected to be completed and increase assisted living opportunities for older adults in the City during the planning period.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Continue providing services to 1,000 older adults per year through the Older Adults Program.</li> <li>• Continue providing Dial-a-Ride services to 1,000 older adults and/or residents with disabilities (all ages) per year.</li> </ul>
<b>Timeframe</b>	Ongoing, annually throughout planning period.
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>• Senior Services Care Manager</li> <li>• Fire Department</li> <li>• Parks and Recreation Department</li> </ul>
<b>Funding Sources</b>	General Fund / Beach Cities Health District
<b>Relevant Policies</b>	1.3, 2.3, 3.1, 3.2, 4.1

**Program 22: Parking Reductions**

Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing for vulnerable populations. The City will make Zoning Code revisions to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development (AB 1851).

The City currently provides reduced parking requirements consistent with AB 2345 (2020) for housing developments that qualify for a density bonus pursuant to State density bonus law. To identify opportunities for additional parking reductions for residential multifamily housing, the City will complete a parking study for sites that are zoned to allow residential development outside of the Coastal Zone. This may include, but not be limited to, reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities.

<b>Objective</b>	<ul style="list-style-type: none"> <li>• Amend the Zoning Code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.</li> </ul>
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	<ul style="list-style-type: none"> <li>Complete a parking study for reduced parking requirements for multifamily housing and implement flexibility in parking requirements based on findings.</li> </ul>
<b>Timeframe</b>	<p>Amend the Zoning Code to comply with religious institution–affiliated housing development projects by March 2023.. Process LCP Amendments as required.</p> <ul style="list-style-type: none"> <li>Complete parking study by June 2024. Based on findings, amend the Zoning Code by January 2025.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.4, 4.1, 4.2

*Program 23: Preserving Housing Capacity*

Section 10.12.030 of the MBMC establishes standards to avoid “mansionization.” These provisions act to discourage construction of overly large dwellings that are out of scale with the surrounding neighborhood. These provisions include increased setback and open space requirements for new single-family residences. In addition to issues of scale, the large dwellings are also more costly, and lead to increased pressure to demolish modest dwellings in favor of lavish structures affordable only to the most affluent. In an effort to incentivize multifamily housing while continuing to disincentivize “mansionization,” the City provides an exception for minimum and maximum lot sizes for multifamily housing with three or more dwelling units in accordance with Section 10.12.030.k of the MBMC. The City also provides an exception to a lot merger of parcels for existing religious assembly and public or private school uses, when the site is used as a single building site under Section 11.32.090 of the MBMC.

Many single-family homes in the City have been previously constructed on double lots. The maximum lot standards noted above help prevent consolidation of lots for the purpose of developing large, single dwelling units. However, under Section 10.52.050.F of the MBMC, property owners in residential zones may develop contiguous separate lots as one site without requiring a lot merger, with only detached accessory structure(s) on one or more of the lots, which includes guest houses, garages and parking areas, and pools. For development standards, with the exception of the parking calculation, the lots are treated as separate. This presents property owners with the opportunity to buy adjacent lots with existing unit(s) for the purpose of demolishing the unit(s) and developing only detached accessory structure(s), ultimately reducing the City’s overall housing stock. To mitigate the loss of dwelling units through demolition and to conserve the existing housing stock, the City will amend the MBMC to eliminate provision 10.52.050.F from the Zoning Code such that all parcels operating as one site will need to be consolidated and therefore be subject to existing maximum lot size requirements.

Further, while the City incentivizes lot consolidation for multifamily residential developments, as detailed in **Program 16, Lot Consolidation Incentive**, the City will refrain from approving any

merger that would result in a net loss in residential capacity and conflict with the no-net-loss provisions of SB 330 (see **Program 26, Replacement Requirements**).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Continue to implement Sections 10.12.030 and 11.32.090 of the MBMC to prevent mansionization and lot mergers that reduce future housing capacity.</li> <li>Amend the Zoning Code to eliminate provision 10.52.050.F to mitigate the loss of dwelling units through demolition and to conserve the existing housing stock.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Ongoing implementation of Sections 10.12.030 and 11.32.090 of the MBMC throughout the planning period.</li> <li>Amend the Zoning Code by January 2024.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.1, 1.2, 1.3, 1.4, 2.1

*Program 24: Priority Services*

Pursuant to Chapter 727, Statutes of 2005 (SB 1087), the City is required to deliver its adopted Housing Element and any amendments thereto to local water and sewer service providers. This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects. The City is the direct provider of water, sewer, and storm drain maintenance. As such, the City will internally coordinate with the Public Works Department for review and consideration when reviewing new residential projects.

The City’s current Urban Water Management Plan acknowledges the requirements and includes the projected water use for single-family and multifamily housing needed for lower-income households. The Community Development Department will coordinate with Public Works to ensure that proposed developments that include housing affordable to lower-income households, including extremely low- and very low-income households, are prioritized for the provision of water and sewer services. Internal coordination will further support the prioritization of water and sewer services for future residential development, including units affordable to lower-income households.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Internally distribute adopted Housing Element to Public Works Department.</li> <li>Increased coordination with the Public Works Department to ensure that adopted policies prioritize water and sewer allocation for affordable housing development.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Internally distribute adopted Housing Element upon local adoption of the 6th Cycle Housing Element by March 2023.</li> </ul>

	<ul style="list-style-type: none"> <li>• Ongoing coordination throughout the planning period.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	2.1, 2.2, 4.2

*Program 25: Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities*

The City adopted a Reasonable Accommodation Ordinance in 2013 to comply with reasonable accommodation procedures of the Fair Housing Act, and one request was received and approved during the 5th Cycle planning period. These procedures are codified in Chapter 10.85 of the MBMC, establishing the City's procedures related to requests for reasonable accommodations. The process provides a deviation procedure that is available to applicants for circumstances where the existing zoning regulations would preclude residential development for persons with disabilities. Requests for a reasonable accommodation shall be reviewed by the Community Development Director, and may, in their discretion, refer applications to the Planning Commission for consideration.

Although requests are seldomly referred to the Planning Commission for their consideration and there are no public hearing or noticing requirements tied to their review, the MBMC does not outline the bases on which a decision on the matter could or should be deferred to the Planning Commission. In an effort to proactively remove ambiguities that may impose extra hurdles for people with disabilities, the City will amend the reasonable accommodation procedures to remove discretionary referrals to the Planning Commission, and the requests shall be reviewed and may be granted solely by the Director. In addition, the City will develop materials and outreach methods to increase public awareness and ease of access to policies, programs, and processes addressing reasonable accommodation.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Amend the MBMC to remove potential barriers for people with disabilities, including persons with developmental disabilities, related to requests for reasonable accommodations, and in accordance with current fair housing laws.</li> <li>• Develop outreach and dissemination programs and materials for the public and City staff.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Amend the MBMC by March 2023.</li> <li>• Develop outreach and dissemination materials by January 2024..</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.4, 3.1, 4.1, 4.2, 4.3

**Program 26: Replacement Requirements**

The City will mandate replacement requirements pursuant to the requirements as set forth in Government Code Section 65915, subdivision (c)(3) on sites identified in the Sites Inventory (See the Electronic Housing Element Site Inventory Form included as **Exhibit A** of **Appendix E** for a complete list of parcels identified in the Sites Inventory), and consistent with the Housing Crisis Act of 2019 and related State housing law for proposed housing developments on sites that currently have residential uses, or within the past 5 years have had residential uses that have been vacated or demolished that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Amend staff procedures related to the review and issuance of demolition and development permits.</li> <li>• Enforce replacement requirements in accordance with Government Code Section 66300, and the requirements as set forth in Government Code Section 65915, subdivision (c)(3).</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Amend staff procedures by January 2023.</li> <li>• Continue ongoing replacement requirements throughout the planning period.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.3, 1.4, 2.3, 4.1, 4.3

**Program 27: Solar Panel Incentives**

Solar panels may be used on roofs of residential and commercial structures to generate electricity that is either transmitted to the grid or stored in batteries on site. The existing height limits in Manhattan Beach ensure rooftop solar units would not eventually be subject to shade and shadow, which would render them ineffective.

To successfully promote the use of alternate energy, the City has subsidized permitting fees for solar panels since 2008. The current permit fee for solar panels is \$100. The City’s fee incentives resulted in 800 solar permits issued during the 5th Cycle planning period. The City will continue to promote and incentivize alternate energy through permit subsidies for solar panels.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Promote and incentivize alternate energy through permit subsidies for approximately 90 solar permits per year.</li> <li>• Continue to track number of solar permits.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing annually throughout the planning period.</li> <li>• Annual monitoring to track permits.</li> </ul>

<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	3.2, 3.3, 3.4

*Program 28: Specialized Housing Types to Assist Persons with Special Needs*

**Employee Housing**

Pursuant to the State Employee Housing Act (Section 17000 et seq. of the Health and Safety Code), employee housing for agricultural workers consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single family or household is permitted by right in a zoning district that permits agricultural uses by right. Therefore, for properties that permit agricultural uses by right, a local jurisdiction may not treat employee housing that meets the above criteria any differently than an agricultural use. The Employee Housing Act also requires that any employee housing providing accommodations for six or fewer employees be treated as a single-family structure, with no Conditional or Special Use Permit or variance required.

Employee housing is not currently defined in the MBMC because the City does not currently have any zones that permit agricultural uses, and no agricultural land exists in the City; accordingly, no specific provisions are included regarding this use. If the Zoning Code is ever amended to add a zoning district that permits agricultural uses, the City will make corresponding MBMC amendments related to agricultural workers and current employee housing requirements consistent with State law, to assist in the production of this special housing type to serve lower-income households, including extremely low-income households.

**Emergency Shelters**

Pursuant to State law, local governments must identify one or more zoning categories that allow emergency shelters (year-round shelters for people experiencing homelessness) without discretionary review. Emergency shelters serve those experiencing homelessness, including extremely low-income households and those with special housing needs. In compliance with State law, the MBMC allows emergency shelters by-right in the Public and Semi-Public (PS) and Industrial Park (IP) zones subject to non-discretionary approval. However, the City will amend the MBMC to ensure that parking requirements for emergency shelters accommodate the staff working in the shelter and do not require more parking than other residential or commercial uses within the same zone (AB 139, 2019).

**Supportive Housing**

State law mandates that local jurisdictions consider supportive housing a residential use of property allowed subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The MBMC allows supportive housing as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone in accordance with State law.



In addition, State law provisions have recently been modified to require approval of supportive housing that meets the specified requirements of State law as a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses (AB 2162). Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within 0.5 miles of a public transit stop (Government Code Section 65915). The City will amend the MBMC to comply with current State law. This amendment will provide additional housing opportunities for lower-income households, including extremely low-income housing and those with special housing needs.

### **Low-Barrier Navigation Centers**

Low-Barrier Navigation Centers are housing-first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The MBMC does not currently define Low-Barrier Navigation Centers; therefore, it also does not identify zoning districts in which this use is permitted.

The City will amend the MBMC to permit the development of Low-Barrier Navigation Centers that meet the requirements of State law as a use by-right, without requiring a discretionary action, in mixed-use and nonresidential zones that permit multifamily uses (AB 101). This use will increase opportunities to serve those experiencing homelessness, including extremely low-income households and those with special housing needs.

### **Residential Care Facilities**

Residential Care Facilities serving seven or more persons, referred to as Residential Care, General in the MBMC, is classified as a public and semipublic use under Section 10.08.040 - Public and Semipublic Use Classifications of the MBMC. As such, these facilities are conditionally permitted uses requiring a Use Permit in the PS (Public and Semi-Public) zone. Further, the City facilitates additional opportunities for development of Residential Care, General by permitting these facilities in two additional zoning categories (residential and commercial), including the RH, RPD, RSC, and CG, subject to a Use Permit.

Due to the complexity associated with Residential Care Facilities, the necessary infrastructure, and requirements tied to state licensing, opportunities to remove the discretionary permit are limited. However, the City will mitigate any constraints that may be posed by a Use Permit for Residential Care Facilities by making the approval process more predictable and transparent. Currently, Residential Care, General facilities are subject to the broader findings for all Use Permits outlined in Section 10.84.060 - Required Findings, of the MBMC. The City will amend the Zoning Code to include findings specific to Use Permits for Residential Care, General (serving seven or more persons) facilities. The City will ensure the findings are objective and improve certainty in the development approval process to better facilitate the production of Residential Care Facilities to serve the needs of the community.

Separately, but sharing a common goal, the City provides reasonable accommodation procedures for those with disabilities as outlined in Program 25. Through implementation of Program 25, the City will remove discretionary referrals to the Planning Commission, and the requests shall be reviewed and may be granted solely by the Director. The process provides a

deviation procedure that is available to applicants for circumstances where the existing development regulations would preclude residential development for persons with disabilities.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Ensure the MBMC continues to be consistent with State law and case law relative to special needs housing through ongoing review and amendments, as required under State law..</li> <li>• Amend the MBMC to permit supportive housing in accordance with State law.</li> <li>• Amend the parking requirements for emergency shelters to ensure consistency with State law.</li> <li>• Amend the MBMC to ensure that any application for supportive housing or a Low-Barrier Navigation Center is processed “by right” in accordance with State law.</li> <li>• Amend the MBMC to include findings specific to Use Permits for Residential Care, General (serving seven or more persons) facilities that are objective and improve certainty in the development approval process.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Annual monitoring of State laws regarding special needs housing, throughout the planning period.</li> <li>• Adopt policies and procedures for processing supportive housing and Low-Barrier Navigation Centers by January 2023.</li> <li>• Amend the MBMC by March 2023.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.2, 2.2, 2.4, 4.1, 4.2, 4.3

**Program 29: Support for Those Experiencing Homelessness**

In March 2017, the County passed Measure H, which created significant new resources to address homelessness, including Homelessness Plan Implementation Grants for local jurisdictions.

In 2018, the City Council adopted the City’s Five-Year Plan to Address Homelessness in Our Community, containing goals aligned with the City of Manhattan Beach’s and County of Los Angeles’s objectives to address homelessness. The City also submitted a multi-jurisdictional proposal with the Cities of Redondo Beach and Hermosa Beach (all three collectively referred to as “South Bay Beach Cities”) to the County for outreach and education, coordination of regional efforts to address homelessness, and housing navigation services.

In April 2019, the Los Angeles County Homeless Initiative announced the award of Measure H grant funding to the South Bay Beach Cities totaling \$330,665 toward homeless coordination, training, and housing navigation services. Subsequently, the City Council awarded a subcontract

to Harbor Interfaith Services to provide three full-time-equivalent positions to assist individuals and families experiencing homelessness in the South Bay Beach Cities.

Consistent with the City’s Homelessness Plan’s efforts to educate the community on various resources in the South Bay, the City has produced a resource guide for those experiencing homelessness, which is available on the City’s website. The guide summarizes a variety of resources offered near Manhattan Beach for those experiencing homelessness and contains a resource card that offers important phone numbers for quick reference.

Under this program, the City will continue to implement the policies and actions of its Five-Year Plan to Address Homelessness in Our Community to continue addressing the needs of its residents experiencing homelessness for affordable housing and housing navigation services. The City will also continue regional coordination utilizing Measure H grant funding in partnership with the Cities of Redondo Beach and Hermosa Beach and seek additional funding sources with the South Bay Beach Cities for continued homeless services. Further, the City will continue to educate the community on various resources in the South Bay and ensure the resource guide for those experiencing homelessness is kept up to date and available on the City’s website.

<b>Objective</b>	<ul style="list-style-type: none"> <li>• Seek additional funding sources for continued support services for the population experiencing homelessness.</li> <li>• Continue coordination of regional efforts with partner agencies and organizations, such as Cities of Redondo Beach and Hermosa Beach, and the Beach Cities Health District through quarterly meetings.</li> <li>• Educate the community on various resources in the South Bay and ensure the resource guide for those experiencing homelessness is kept up to date and available on the City’s website.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing monitoring of funding sources throughout planning period and apply for additional funding opportunities annually during the planning period, where available, beginning January 2023.</li> <li>• Ongoing – quarterly communications with partner agencies and organizations.</li> <li>• Update resource guide on City website annually during the planning period, to reflect any changes to program or resource offered for those experiencing homelessness.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Grant awarded from the Los Angeles County Measure H funds; General Funds for the staff time (grant applications and educational material).
<b>Relevant Policies</b>	2.3, 3.1, 4.1, 4.3

**Program 30: Surplus Lands**

The City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Report in accordance with the requirements of AB 1486 (2019). If the City identifies any public land that they intend to declare as surplus land at any point, the City will send notices about available, surplus local public land to HCD, local public entities within the jurisdiction where the surplus local land is located, and any developers who have notified HCD of their interest in developing affordable housing on surplus local public land in accordance with the requirements set forth in the Surplus Land Act (Government Code Section 54220-54234).

<b>Objective</b>	<ul style="list-style-type: none"> <li>Identify and track surplus City-owned sites. Report on these lands annually through the Housing Element Annual Progress Report.</li> <li>Comply with Surplus Land Act requirements set forth in Government Code Section 54220-54234.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Annually conduct inventory and report surplus and excess local public lands on or before April 1 of each year.</li> <li>Ongoing compliance with Surplus Land Act throughout the planning period.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	1.2, 2.1, 2.2

**Program 31: Water Conservation and Green Building Standards**

California’s water system is energy intensive, accounting for nearly 10 percent of the State’s greenhouse gas emissions. Actions that improve water-use efficiency can reduce energy use.<sup>11</sup> This can be achieved through many ways, such as using low-flow fixtures and drought-tolerant landscaping. Section 7.44.020 of the MBMC addresses water conservation and provides for permanent water conservation measures and drought restrictions. In addition, water conservation requirements apply to 100 percent of projects that the City approves. Water conservation requirements are built into Title 9 via the Green Building Code, and Title 10 via State Model Water Efficient Landscape Ordinance requirements.

The City has adopted the 2019 California Green Building Standards Code, and additionally requires the following measures:

- Insulating hot water pipes to minimize energy loss.
- Using caulk and insulation that are formaldehyde-free or contain low VOCs (volatile organic compounds).

<sup>11</sup> Public Policy Institute of California. 2016. [https://www.ppic.org/wp-content/uploads/R\\_1016AER.pdf](https://www.ppic.org/wp-content/uploads/R_1016AER.pdf).

- Installing pre-plumbed water piping and sensor wiring to the roof for future solar water heating.
- Using duct mastic on all duct joints and seams to minimize energy loss.
- Installing Energy Star bath fans vented to the outside.
- Installing energy-efficient water fixtures.

The United States Green Building Council continues to review more-intensive measures to be included in buildings for Leadership in Energy and Environmental Design (LEED) certification. The City continues to review its codes to integrate greener building techniques. The City Council has expressed interest in pursuing green building techniques above and beyond State requirements, a task currently being undertaken through the City’s Sustainability Division’s Climate Ready MB Program. The City reviews standards through the Environmental Task Force and will continue to review and update its codes as updates become available. The City anticipates State Green Building Codes being updated in the next 2 years, at which point the City will also update City regulations.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Review green building techniques in the MBMC to ensure compliance with State requirements.</li> <li>• Amend the MBMC to conform to future amendments or updates to State Green Building Standards Code if necessary.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Review of green building techniques in City codes by January 2024.</li> <li>• Update the MBMC within 1 year after any future amendments or updates to the California Green Building Standards Code.</li> </ul>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>• Community Development Department</li> </ul>
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	3.2, 3.3, 3.4

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# City of Manhattan Beach

## 6th Cycle Housing Element

DRAFT FOR ADOPTION

### Appendices

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Appendix A: 5th Cycle Review

Appendix B: Needs Assessment

Appendix C: Constraints and Zoning Analysis

Appendix D: Affirmatively Furthering Fair Housing Analysis

Appendix E: Sites Analysis and Inventory

Appendix F: Community Engagement Summary

# Appendix A: 5th Cycle Review

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# 1 Introduction

For the 5th Cycle Housing Element (2014–2021), the City of Manhattan Beach (City) committed to specific programs to address the comprehensive housing needs of the City and to help achieve the goals identified in the 5th Cycle Housing Element (5th Cycle). This appendix to the City’s 6th Cycle Housing Element (6th Cycle) evaluates progress made toward the goals and actions of the 5th Cycle Housing Element, and is used as a foundation to inform the programs of the 6th Cycle (2021–2029), tailored to meet this cycle’s housing needs.

California Government Code Section 65588(a) requires each jurisdiction to regularly review its Housing Element to evaluate the following:

- The progress in implementation of the Housing Element
- The effectiveness of the Housing Element programs in progress toward achieving the housing goals and objectives
- The appropriateness of the housing goals, objectives, and policies, and in contributing to the attainment of the State housing goal

# 2 Evaluation of Previous Housing Element Implementation

This evaluation provides information on the extent to which programs have achieved stated objectives, and whether these programs continue to be relevant to addressing current and future housing needs in the City. The success of a program toward achieving the 5th Cycle goals is the basis for the goals, policies, and programs, and the establishment of objectives provided in the 6th Cycle. **Table 1** lists each program from the 2014–2021 Housing Element, and identifies the program’s progress in implementation, effectiveness, and appropriateness. The goals, policies, and programs of the 6th Cycle are reflective of the program effectiveness as determined by this evaluation. **Table 2** provides an overview of the progress in achieving the housing objectives from the 5th Cycle Regional Housing Needs Allocation (RHNA).

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness										
<b>Goal 1. Preserve existing neighborhoods.</b>											
<b>Policy 1. Preserve the scale of development in existing residential neighborhoods.</b>											
<p><b>Program 1a. – Continue to enforce provisions of the Zoning Code which specify District Development Regulations for height, lot coverage, setbacks, open space, and parking.</b> Section 10.12.030 of the MBMC establishes standards to avoid “mansionization*,” including increased setback and open space requirements for new single-family residences. The additional open space must be provided in areas adjacent to streets or in areas that create useable open space. Open space may be provided above the second story, encouraging structures to be built to less than maximum height thereby reducing the mass of homes. The mansionization ordinance also establishes maximum lot sizes in residential districts as follows:</p> <table border="1" data-bbox="121 732 1144 894"> <thead> <tr> <th>District</th> <th>Maximum Lot</th> </tr> </thead> <tbody> <tr> <td>I - Hill Section: Ardmore east, Manhattan Beach Blvd. south</td> <td>15,000 sq. ft.</td> </tr> <tr> <td>II -Tree Section: Ardmore/Blanche east, Manhattan Beach Blvd.south</td> <td>10,800 sq. ft.</td> </tr> <tr> <td>III - Beach area</td> <td>7,000 sq. ft.</td> </tr> <tr> <td>IV - El Porto</td> <td>7,000 sq. ft.</td> </tr> </tbody> </table> <p>Generally, properties in the Medium and High Density Residential zones that are developed with three or more units are exempt from the stricter requirements in order to encourage multi-family development. Section 10.64.030 of the MBMC requires additional enclosed parking for larger residences. Three enclosed parking spaces are required for residences that exceed 3,600 square feet in floor area, whereas residences smaller than 3,600 square feet only need to provide two spaces. Only one space is required for multi-family units with less than 550 square feet. These provisions act to discourage construction of overly large dwellings that are out of scale with the surrounding neighborhood. In addition to issues of scale, the large dwellings are also more costly, and lead to increased pressure to demolish modest dwellings in favor of lavish structures affordable only to the most affluent.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going</p>	District	Maximum Lot	I - Hill Section: Ardmore east, Manhattan Beach Blvd. south	15,000 sq. ft.	II -Tree Section: Ardmore/Blanche east, Manhattan Beach Blvd.south	10,800 sq. ft.	III - Beach area	7,000 sq. ft.	IV - El Porto	7,000 sq. ft.	<p><b>Progress:</b> The City of Manhattan Beach (City) continued to enforce these site development standards, along with a Minor Exceptions process, which provides a certain amount of flexibility for remodeling and expanding non-conforming residences, and in turn preserves existing neighborhoods and deters “mansionization.” During the planning period, over 190 Minor Exceptions have been approved.</p> <p><b>Effectiveness:</b> Planning staff implements this program on a daily basis through plan checks and Planning Entitlement reviews for residential projects, ensuring that all projects meet the development standards provided in the Planning and Zoning Code. Since 2014, 198 Minor Exceptions have been processed, demonstrating the effectiveness of the Minor Exception process. Additionally, the City has granted only five Variances, all of which complied with the required findings, including unique circumstance.</p> <p><b>Appropriateness:</b> This program is implementing existing development standards. Although staff will continue to implement this program through implementation of the existing development standards included in the City’s Planning and Zoning Code, the program is not furthering Housing Element goals, and will not be continued in the 6th Cycle. Instead, a new program will be developed to incentivize multifamily housing while continuing to disincentivize “mansionization.”</p>
District	Maximum Lot										
I - Hill Section: Ardmore east, Manhattan Beach Blvd. south	15,000 sq. ft.										
II -Tree Section: Ardmore/Blanche east, Manhattan Beach Blvd.south	10,800 sq. ft.										
III - Beach area	7,000 sq. ft.										
IV - El Porto	7,000 sq. ft.										

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Objective:</b> Continue to preserve the character of existing neighborhoods</p> <p>*Mansionization occurs when large homes replace historically small homes, on consolidated and standard sized lots, appearing out of scale and resulting in an impression of unrelieved building bulk, screening out light and air and dwarfing existing standard sized buildings in a neighborhood. The consolidation of lots for mansionization results in an inefficient use of land for homes that can only be afforded by affluent households.</p>	
<p><b>Program 1b. – Continue to apply the Design Overlay as provided under Section 10.44 of the Municipal Code, as appropriate.</b></p> <p>This section of the Code provides a mechanism for establishing specific development standards and review procedures for certain areas of the City with unique needs, consistent with General Plan policies, taking into consideration the unique nature of a given neighborhood. Seven sub-districts have been established:</p> <ul style="list-style-type: none"> <li>D1) Rosecrans Avenue, where higher fences in the front-yard setback area are needed to reduce traffic noise;</li> <li>D2) 11<sup>th</sup> Street, where limitations on building height and density are needed to minimize building bulk and buffer adjoining residences;</li> <li>D3) Gaslamp neighborhood, where special design standards and review procedures are needed to preserve existing neighborhood character;</li> <li>D4) Traffic noise impact areas, where higher fences are needed to reduce traffic noise;</li> <li>D5) North end commercial, where special design standards are needed to accommodate additional residential development;</li> <li>D6) Oak Avenue, where special design standards, landscaping and buffering requirements are needed to allow commercial use of property in a residential area adjacent to Sepulveda Boulevard;</li> <li>D7) Longfellow Drive area, including residential lots in Tract 14274 located on Longfellow Drive, Ronda Drive, Terraza Place, Duncan Drive and Kuhn Drive, where a special minimum lot area requirement and restriction on subdivision is needed to preserve the character of the neighborhood, including views and privacy.</li> </ul> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> City General Fund</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> Preserve neighborhood character citywide.</p>	<p><b>Progress:</b> Planning staff continues to apply the Design Overlay regulations as a standard part of reviewing plan checks and Planning Entitlements. Furthermore, in 2019, the City adopted the Sepulveda Boulevard Corridor Overlay (D8), enacting more flexible development standards, where needed, to continue to promote desirable development, uses, and economic vitality within the General Commercial (CG) zone.</p> <p><b>Effectiveness:</b> The program successfully enforces specific development standards for each overlay zone while taking into consideration the unique nature of each given neighborhood.</p> <p><b>Appropriateness:</b> This program implements existing Zoning Code without a quantifiable objective. Therefore, it will be replaced by an objective design standards program in compliance with Senate Bill (SB) 330 (2019).</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Program 1c. – Refrain from approval of lot mergers that would result in a reduction in the number of residences allowed.</b>                      Many homes have been constructed on double lots. The City has permitted the underlying subdivision to remain, in order that separate homes may potentially be built on each of the underlying lots. In accordance with Zoning Code Section 10.52.050, accessory structures ancillary to a primary residence may be constructed on an adjacent lot in common ownership without processing a lot merger. Similarly, the City will not require that lots be merged when schools, churches or other similar public assembly uses are constructed on multiple lots. In addition, the maximum lot standards noted above would prevent consolidation of very large lots. This will preserve opportunities for future housing units that would otherwise be lost if lots were consolidated.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Preserve neighborhood character citywide</p>	<p><b>Progress:</b> Implementation continues through enforcement of the existing maximum lot size standards. The City approved a total of 22 lot line consolidations during the planning period.</p> <p><b>Effectiveness:</b> The maximum lot size standards are effective in preventing consolidation of multiple smaller lots into a single, larger lot for low-density housing development, and effectively retains existing housing capacity. However, as most parcels in the City are less than 0.5 acres, maximum lot sizes are a constraint for those trying to consolidate lots for multifamily housing.</p> <p><b>Appropriateness:</b> Similar to Program 1a, this program is implementing existing development standards without a quantifiable objective. Instead a new program will be developed to incentivize multifamily housing while continuing to disincentivize “mansionization.” Specifically, the program will analyze Zoning Code Section 10.52.050 currently permitting property owners in residential zones to develop contiguous separate lots as one site without requiring a lot merger, and any necessary code amendments to conserve the existing housing stock.</p>
<p><b>Policy 2. Preserve existing dwellings.</b></p>	
<p><b>Program 2a. – Allow non-conforming dwellings to remain and improve.</b>                      Under Zoning Code Section 10.68, the development process for improvements to smaller non-conforming residential structures has been streamlined. Exceptions may be approved administratively to allow additions to non-conforming structures that will not result in total structures in excess of 66 percent of the maximum floor area in Districts III and IV or 75 percent of the maximum floor area in Districts I and II, or 3,000 square feet, whichever is less.</p> <p>Non-conforming dwellings may also be improved while maintaining non-conforming, existing parking. For dwellings with less than 2,000 square feet of floor area, only one enclosed parking space is required.</p> <p>The non-conforming dwellings to be preserved tend to be smaller and less costly than newer housing in the community. The preservation and improvement of these units will maintain the pool of smaller units which might otherwise be demolished to make way for larger, more costly housing.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund</p>	<p><b>Progress:</b> Planning staff continuously processes Minor Exceptions, which serve to incentivize preservation of smaller, more affordable housing units by allowing minor additions and remodels.</p> <p><b>Effectiveness:</b> Since 2014, a total of 198 Minor Exceptions have been processed, demonstrating the effectiveness of the Minor Exception process, which provides a certain amount of flexibility for remodeling and expanding non-conforming residences. It is important to maintain the option of a Minor Exception to incentivize remodeling vs. demolishing and building a new structure.</p> <p><b>Appropriateness:</b> Delete. This program is a routine function without a quantifiable objective. Although staff will continue to implement this program through implementation of the existing Planning and Zoning Code, the program will not be carried over to the 6th Cycle Housing Element.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Schedule:</b> On-going  <b>Objective:</b> Preserve smaller, more affordable housing units</p> <p><b>Program 2b. – Utilize Community Development Block Grant funds or exchange funds for home improvement loans for low-income residents, consistent with income limits provided for such funding, and pursue additional sources of funding for City programs.</b>                      CDBG funds are exchanged for unencumbered General Funds, which are granted to local public service agencies who provide services for low- and moderate-income residents as well as elderly, disabled, and abused residents. Services include counseling, shelter referral, dental care, case management and groceries for seniors. This allows the City to exceed the 15 percent limit on a locality's CDBG funds that may be passed on to such social service providers.</p> <p>A large proportion of very-low- and low-income homeowners pay over half their income on housing, leaving little for home maintenance or improvement. Many homeowners in the City could not afford to purchase their homes at currently prices, and are "house rich and cash poor," which is not unusual for the region. Long-time residents would be expected to have decades-old mortgages with relatively low payments. Some may have completed their mortgage payments. Thus, as they approach their retirement years on a fixed income, they could continue to afford to live in their current residences. However, major home repairs and rehabilitation could exceed limited budgets.</p> <p>Under this program, a portion of CDBG funds could be utilized to provide small loans or grants for rehabilitation of existing housing or utility under-grounding. Years ago, residents showed little interest in such a program. However, the population has aged, leading to a greater number of residents on fixed incomes. Before initiating any such program, the City will attempt to establish whether interest exists through public solicitation of interest. It would be important to assure residents of full confidentiality, in order not to deter participation.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> CDBG  <b>Schedule:</b> Throughout the planning period.  <b>Objective:</b> Preserve/improve 16 low and moderate income units</p>	<p><b>Progress:</b> Since 2016, the City of Manhattan Beach has used its annual Community Development Block Grant (CDBG) allocation for infrastructure improvements, specifically installation of Americans with Disabilities Act (ADA)–compliant curb ramps throughout City intersections. Most recently, CDBG funds were allocated to support the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, and ADA-compliant curb ramp and gutter to create unobstructed paths of travel and accessibility for older adults and residents with disabilities to Manhattan Senior Villas, located at 1300 Parkview Avenue.</p> <p><b>Effectiveness:</b> Although the funds were not specifically used for rehabilitation of senior housing, they were used for ADA improvements in the right-of-way near the Manhattan Senior Villas. Cities may no longer exchange CDBG funds with another Los Angeles Urban County participating city. Thus, the City no longer supports any public service providers with CDBG funds, directly or indirectly.</p> <p><b>Appropriateness:</b> The program will be carried over and revised to focus on ADA improvements in the City. Construction is anticipated to begin this year for the Manhattan Village Senior Villas ADA improvements. The revised program will subsequently focus on ADA-compliant curb ramp improvements in the City.</p>
<p><b>Goal 2. Provide a variety of housing opportunities for all segments of the community commensurate with the City’s needs, including various economic segments and special needs groups.</b></p>	
<p><b>Policy 3. Provide adequate sites for new housing consistent with the Regional Housing Needs Assessment allocation and the capacity of roadways, sewer lines, and other infrastructure to handle increased growth.</b></p>	

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Program 3a. – Continue to facilitate infill development in residential areas.</b>                      There are very few vacant residential parcels remaining in the City. Development of scattered vacant and underutilized residential infill sites can help to address the need for additional housing units to accommodate the City’s share of regional growth needs.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Increase the supply of housing through infill development</p>	<p><b>Progress:</b> APN 4137002016 (adjacent to 3804 Highland) is still an empty parking lot and remains available for infill development; APN 4137010022 (133 El Porto) is still vacant and remains available for infill development; 1120 6th Street was developed with a single-family residence in 2015.  <b>Effectiveness:</b> With limited vacant lots available for infill development, there are very limited opportunities to increase the supply of housing through infill development. This program could be more effective if it were to focus on redevelopment of underutilized lots, or focused efforts to increase communication with developers.  <b>Appropriateness:</b> Deleted. As mentioned above, the effectiveness of the program is extremely limited by the built-out nature of the City. Other strategies will be implemented for incentivizing development and increasing communication efforts in the City.</p>
<p><b>Program 3b. – Facilitate multi-family residential development in the CL, CD, and CNE commercial districts.</b>                      Provision of housing in commercial and mixed-use areas is a long-time (since 1993) City housing policy. Under Section 10.16.020 of the Municipal Code, exclusive multi-family residential uses are permitted upon the approval of a use permit in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) Districts. Single-family residential development is permitted by-right in the North End Commercial District if located on a site which (1) fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a use permit is required.                      Development of residential and mixed uses in commercial districts can facilitate the delivery of housing. Not only does mixed-use development make additional areas available for residential use, in a mixed-use project the provision of an accompanying commercial use can help absorb some of the fixed costs of development, thereby facilitating the production of lower-cost units. In addition, traffic congestion along with energy consumption and air emissions can be reduced as residents are able to walk to nearby commercial services. This can also enhance the viability of less thriving commercial areas.</p>	<p><b>Progress:</b> The objective of this policy to streamline the application process for residential or mixed-use projects in the CL, CNE, and CD zoning districts was not accurately fulfilled as a part of the code amendments that followed adoption of the 5th Cycle Housing Element. Although Precise Development Plans (PDPs) and Site Development Permits (SDPs) were introduced in the residential zoning districts to streamline the application process for residential projects on residentially zoned lots, the permitted land uses table in Title 10.16 for commercial zones was not amended and still reflects the requirement for use permits for multifamily and mixed-use projects. In addition, the current PDP process involves findings and conditions of approval.  <b>Effectiveness:</b> The intent of the lot consolidation portion of the program is effective (examples include 401 Rosecrans and 1701 Artesia) and will be carried forward and correctly implemented via future code amendments. The City will evaluate whether a consistent approach to SDPs and PDPs in the residential and commercial zones is preferred.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness								
<p>To enhance opportunities for residential development commensurate with the City’s share of lower-income regional need of 16 units, the following incentives have been established for affordable multi-family development within the Downtown Commercial, Local Commercial, and North End Commercial districts:</p> <ol style="list-style-type: none"> <li>1. Owner-occupied and rental multi-family housing developments that qualify for a density bonus under Government Code Sec. 65915 are permitted within these districts subject only to a non-discretionary Precise Development Plan controlling project design. Projects with 5 units or less are reviewed by the Director and projects with 6 units or more are reviewed by the Planning Commission. Other non-affordable residential developments with 6 or more units within these zones will continue to require approval of a Site Development Permit (see also Program 5b).</li> <li>2. The City will facilitate consolidation and development of small parcels through the following actions: <ul style="list-style-type: none"> <li>• Assist affordable housing developers in identifying opportunities for lot consolidation using the City’s GIS system and property database;</li> <li>• Provide a graduated density bonus for lower-income housing developments that consolidate small parcels into a larger building site according to the following formula:</li> </ul> <table border="1" data-bbox="109 894 1157 1047"> <thead> <tr> <th>Combined Parcel Size</th> <th>Base Density Increase*</th> </tr> </thead> <tbody> <tr> <td>Less than 0.50 acre</td> <td>No increase</td> </tr> <tr> <td>0.50 acre to 0.99 acre</td> <td>5% increase</td> </tr> <tr> <td>1.00 acre or more</td> <td>10% increase</td> </tr> </tbody> </table> <p>*Excluding density bonus</p> <ul style="list-style-type: none"> <li>• Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments;</li> <li>• Publicize the program on the City’s website, at the Planning counter, and by notice to affordable housing providers.</li> </ul> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Throughout the planning period.  <b>Objective:</b> Provide adequate sites to accommodate the City’s lower-income RHNA allocation</p> </li> </ol>	Combined Parcel Size	Base Density Increase*	Less than 0.50 acre	No increase	0.50 acre to 0.99 acre	5% increase	1.00 acre or more	10% increase	<p><b>Appropriateness:</b> This program will be revised and separated into three programs related to streamlined development, lot consolidation incentives, and developer outreach and transparency consistent with Assembly Bill 1483, as follows:</p> <ul style="list-style-type: none"> <li>• Removing discretionary actions related to PDPs to create a truly administrative non-discretionary approval process.</li> <li>• Permitting multifamily housing in the CL, CD, and CNE zones as intended by the 5th Cycle program, including a streamlined approval process for projects that qualify for a density bonus under State law.</li> <li>• Adopting development standards for multifamily residential and mixed-use projects in the three commercial zones (CL, CD, and CNE).</li> </ul>
Combined Parcel Size	Base Density Increase*								
Less than 0.50 acre	No increase								
0.50 acre to 0.99 acre	5% increase								
1.00 acre or more	10% increase								

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Program 3c. – Continue to provide for a mixture of uses in the Manhattan Village area.</b>                      The Manhattan Village area contains a mix of hotel, office, research and development, retail, recreation and residential uses, including senior housing. The existing parking lot at Parkview Avenue and Village Drive could accommodate up to 25 additional residential units similar to the existing senior project. This site was identified as a potential housing site in the 2003 Housing Element, consistent with the more general 1993 Housing Element program calling for a mixture of uses in the Manhattan Village area.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> 25 senior units</p>	<p><b>Progress:</b> A mixture of uses in Manhattan Village continues to be maintained. The parking lot has not been redeveloped to date.</p> <p><b>Effectiveness:</b> Although the opportunity for a mixture of uses in Manhattan Village remains, future development is market-driven, and there has been no interest expressed in developing the parking lot to date. The program will continue to extend opportunities for residential and mixed-use development in this area.</p> <p><b>Appropriateness:</b> A large portion of the Manhattan Village area was recently redeveloped as part of a \$250 million expansion, and renovation of the Manhattan Village Mall is expected to be fully completed by the end of 2021. Any potential sites within the Manhattan Village that remain with potential for redevelopment in the 6th Cycle have been included in the new Adequate Sites program and in Appendix E, Sites Analysis and Inventory, of the 6th Cycle Housing Element.</p>
<p><b>Program 3d. – Ensure that development standards for residential uses in the CD and CNE Districts do not pose unreasonable constraints to housing.</b>                      The City will review current development standards and evaluate the feasibility of a Code amendment to eliminate the maximum number of units per lot, so long as the otherwise maximum physical dimensions of the allowable building envelope are not exceeded in mixed-use commercial/residential developments. Greater numbers of smaller units could result, with likely occupants being young people and seniors wanting easy access to commercial uses, particularly seniors who no longer feel comfortable driving. The review of development standards will also examine parking requirements for residential and mixed-use developments in commercial districts. Under existing codes, parking spaces located within the Downtown Commercial (CD) district may serve as required parking for a nonresidential use located within the same district at a maximum distance of 1,000 feet. No parking for commercial uses is required at all if the floor area ratio does not exceed 1:1. The same is not permitted for residential uses. In order to facilitate development of residential uses, residential and commercial uses could be treated equally for parking purposes, if the residential units are a small size and the City concludes that it does not burden the District.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund</p>	<p><b>Progress:</b> Staff are currently evaluating parking regulations in an attempt to “modernize” parking requirements and bring requirements into conformance with current industry standards using ULI and ITE ratios. Staff anticipate parking requirements being updated within the next year. However, the parking requirements being evaluated are focused on nonresidential uses. In addition, development standards for residential and mixed-use developments in commercial districts, including in the CD and CNE zones, defer to the High-Density Residential District (RH) zone’s development standards.</p> <p><b>Effectiveness:</b> The program will be carried forward because staff has only seen partial progress on this effort.</p> <p><b>Appropriateness:</b> This program will be revised to include the CL zone and to adopt development standards for multifamily residential and mixed-use projects in the three commercial zones (CL, CD, and CNE) permitting mixed uses.</p>



**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Schedule:</b> Review development standards and process a Code amendment by December 2014</p> <p><b>Objective:</b> Facilitate development of affordable multi-family and mixed use developments</p>	
<p><b>Program 3e. – No Net Loss</b></p> <p>To ensure adequate sites are available throughout the planning period to meet the City’s RHNA, the City will continue to annually update an inventory that details the amount, type, and size of vacant and underutilized parcels to assist developers in identifying land suitable for residential development and that also details the number of extremely low-, very low-, low-, and moderate-income units constructed annually. If the inventory indicates a shortage of available sites, the City shall rezone sufficient sites to accommodate the City’s RHNA.</p> <p>To ensure sufficient residential capacity is maintained to accommodate the RHNA need, the City will continue to implement project-by-project evaluation pursuant to Government Code Section 65863. Should a development proposal result in a reduction of yield below the residential capacity identified in the sites inventory, the City will identify and zone sufficient sites to ensure no net loss in residential capacity.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> City General Fund</p> <p><b>Schedule:</b> Continue to implement Government Code Section 65863</p> <p><b>Objective:</b> Ensure no net loss of housing capacity throughout the planning period.</p>	<p><b>Progress:</b> As part of the annual reporting process, the City continued to monitor site capacity and the net remaining RHNA. No net loss of housing capacity occurred during the planning period; therefore, no rezoning of sites stemming from net loss occurred.</p> <p><b>Effectiveness:</b> This program is effective and necessary, and required by State law; therefore, it is appropriate to carry forward.</p> <p><b>Appropriateness:</b> Continue. Revise as needed to comply with current State law.</p>
<p><b>Policy 4. Preserve the existing affordable housing stock.</b></p>	
<p><b>Program 4. – Regulate the conversion of rental housing to condominiums.</b></p> <p>Section 10.88.080 of the Municipal Code requires that potential displacement of existing tenants be taken into consideration when evaluating requests for conversion of existing rental units to condominium status. In addition, under Section 10.88.070, tenants must be given first right of refusal to purchase at discounted prices. Those tenants who do not wish to purchase must be provided relocation assistance. Elderly and handicapped tenants must be provided life leases, with no rent increases for at least two years, and low- and moderate-income tenants and families must be given at least one year to relocate. These programs help to reduce the impact of condominium conversion on low- and moderate-income households.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> City General Fund, condominium application fees</p> <p><b>Schedule:</b> On-going</p>	<p><b>Progress:</b> Implementation of these regulations continued through the 5th Cycle.</p> <p><b>Effectiveness:</b> No affordable units were converted to condominiums during the 5th Cycle. Program is effective and should continue.</p> <p><b>Appropriateness:</b> Revise to focus on replacement requirements for all housing types in accordance with SB 330 (2019).</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Objective:</b> Preserve 12 affordable units</p>	
<p><b>Policy 5. Encourage the development of additional low- and moderate-income housing.</b></p>	
<p><b>Program 5a. – Provide incentives for housing affordable to low-income households and senior housing.</b>                      Section 10.52.090 of the Municipal Code provides for density bonus or other incentives when low-income housing is provided, in accordance with Section 65915 of the California Government Code. The housing must remain affordable for at least 30 years. The City will continue to implement the Density Bonus ordinance in conformance with state law.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Ongoing implementation of the Density Bonus ordinance.  <b>Objective:</b> Additional affordable housing units commensurate with the City’s RHNA allocation</p>	<p><b>Progress:</b> The City continues to incentivize development of affordable housing by abiding by the local and State density bonus regulations. The density bonus requires updating to attain compliance with current State regulations.</p> <p><b>Effectiveness:</b> Two density bonus projects are in the planning process currently (401 Rosecrans and 1701 Artesia).</p> <p><b>Appropriateness:</b> Revise accordingly to comply with current density bonus requirements (Assembly Bill 1763/SB 2263).</p>
<p><b>Program 5b. – Streamline the development process to the extent feasible.</b>                      The City currently allows and encourages concurrent processing of all discretionary applications for a project, thereby streamlining the development process. Many routine applications may be processed as minor exceptions instead of the longer and more difficult variance process. As discussed in Chapter 4 regarding governmental constraints, processing time for building permits in the City compares favorably with other nearby jurisdictions. To minimize constraints to multi-family development, projects with up to 5 units are approved by the Director through an Administrative Site Development Permit with no public hearing, and a Site Development Permit approved by the Planning Commission is required for projects with more than 5 units. Both the Administrative SDP and the Planning Commission SDP review processes are limited to confirming that the project complies with applicable development standards and does not examine the appropriateness of the use itself.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Throughout the planning period.  <b>Objective:</b> Streamline the development review process for multi-family development.</p>	<p><b>Progress:</b> While certain streamlined processes are currently in place, with examples being the SDP and PDP processes for residential projects in residential zones, other streamlining efforts originally identified in the 5th Cycle Housing Element were not codified properly. To date, the SDP and PDP processes have not been extended in the Planning and Zoning Code to the CL, CNE, and CD zoning districts as originally intended in Policy 3 of the 5th Cycle Housing Element, and mixed-use projects are clearly depicted as a residential use, to which streamlined processes apply per State law.</p> <p><b>Effectiveness:</b> The streamlined permitting option is effective, and the Zoning Code should be amended to accurately reflect the policies in the Housing Element.</p> <p><b>Appropriateness:</b> This program is not appropriate to continue. Revisions to Program 3b will address codifying the approval processes for residential uses in the CL, CNE, and CD zoning districts. Instead, a new program will be included in the 6th Cycle to include SB 35 (2017) streamlining in staff permitting process procedures.</p>
<p><b>Program 5c. – Allow the establishment of manufactured housing on single-family residential lots.</b>                      Manufactured housing can be constructed for much less than the cost of traditional building. Building various standardized modules in one location results in savings due to</p>	<p><b>Progress:</b> The Municipal Code continues to accommodate manufactured housing.</p> <p><b>Effectiveness:</b> No permits have been requested or granted for this type of residential structure during this planning period. Currently,</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>economies of scale and greatly reduced waste of building materials. Factory-built housing designed for placement on fixed foundations can be highly attractive and virtually indistinguishable from standard construction. In addition, current factory-built housing is typically built to higher standards for energy conservation.</p> <p>In accordance with Section 10.52.100 of the Municipal Code, manufactured housing is permitted on single-family lots not occupied by another dwelling. The housing must be secured, must meet certain design criteria, and must be on a relatively flat slope. These criteria are not unduly burdensome and would not prevent the establishment of manufactured housing on residential lots.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> City General Fund</p> <p><b>Schedule:</b> Ongoing.</p> <p><b>Objective:</b> Continue to facilitate development of manufactured housing as a means of reducing housing cost.</p>	<p>the City permits manufactured homes in any residential district where a single-family detached dwelling is permitted, subject to the same restrictions on density and to the same property development regulations, provided that such manufactured home receives a Certificate of Compatibility.</p> <p><b>Appropriateness:</b> Revise to allow manufactured homes in all of the same zone(s) as conventional or stick-built structures are permitted (Government Code Section 65852.3), including commercial or mixed-use zones subject to the same development standards that a conventional single-family residential dwelling on the same lot would be subject to, with the exception of architectural requirements for roof overhang, roofing material, and siding material (Government Code Section 65852.3(a)).</p>
<p><b>Program 5d. – Work with the private sector to facilitate the provision of low-and moderate-priced housing.</b></p> <p>This is a continuation and expansion of the Developer Consultation Program included in the 2003 Housing Element. In the past, the City worked with the private sector to produce two residential projects available to low- and moderate-income households. The Manhattan Terrace development received a certificate of occupancy in July 1991. The City approved a use permit to allow this senior citizen project at 3400 Valley Road. This 48-unit project contains 540-square-foot units with rents at affordable levels. A 104-unit senior project was completed at Manhattan Village on Parkview Avenue in 1997. This project provides housing affordable to very-low- and moderate-income households along with market-rate housing. The City approved a zoning amendment to allow higher density and reoriented a City recreation facility in order to facilitate development of the project.</p> <p>To increase the likelihood of additional affordable housing development during the planning period, the City will take the following actions:</p> <ul style="list-style-type: none"> <li>• Assist developers in identifying suitable sites for affordable housing</li> <li>• Provide fast-track processing</li> <li>• Provide density bonus, modified development standards and other concessions</li> <li>• Prioritize funding for projects that include extremely-low-income units</li> <li>• Reduce development fees if feasible</li> <li>• Provide administrative assistance with grant funding applications</li> </ul>	<p><b>Progress:</b> Planning staff has continued to educate private developers regarding the incentives, opportunities, and streamlined processes available in the City code for the development of projects that include affordable units. Examples include the project at 401 Rosecrans and the project at 1701 Artesia.</p> <p><b>Effectiveness:</b> The program is effective in that one density bonus project is currently in review and a second is pending submittal. Carry forward.</p> <p><b>Appropriateness:</b> Revise to comply with Assembly Bill 1483 transparency requirements.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Meet with interested affordable housing developers when opportunities arise.  <b>Objective:</b> Facilitate the production of new affordable units commensurate with the City’s RHNA allocation</p>	
<p><b>Program 5e. – Allow second units in residential areas.</b>            Section 65852.2 of the California Government Code provides for the establishment of second units subject to certain limitations as a means of increasing housing stock. Absent a local ordinance specifying development standards, the provisions of State law apply. The City does not currently have a local ordinance regarding second units, therefore a Code amendment will be processed in conformance with state law.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Adopt a Second Unit ordinance by December 2014  <b>Objective:</b> Encourage production of second units</p>	<p><b>Progress:</b> An interim Accessory Dwelling Unit (ADU) Ordinance was in place through 2020 in accordance with updated State laws. The City’s current ADU Ordinance and the associated Local Coastal Program amendment are currently under review by the California Coastal Commission. The current ADU Ordinance contains provisions that go beyond those set forth in State law.  <b>Effectiveness:</b> The program has proven to be effective. In 2017, 2018, and 2019, three ADU permits were issued and constructed. From January 2020 to date, the City has issued 11 permits, and 22 applications are currently under City review.  <b>Appropriateness:</b> Update program to include a quantifiable objective based on recent ADU trends, to continue compliance with current State ADU laws, and to develop a plan to incentivize and promote the creation of ADUs that can be offered at affordable rent for very low-, low-, or moderate-income households in accordance with Assembly Bill 671 (2019).</p>
<p><b>Policy 6. Encourage means of increasing ability to afford existing housing stock.</b></p>	
<p><b>Program 6a. – Continue to participate in Los Angeles County Housing Authority programs, and publicize availability of Section 8 rental assistance for households in the City.</b>            Section 8 rental assistance is provided by the United States Department of Housing and Urban Development (HUD) and is administered locally by the Los Angeles Community Development Commission (CDC) operating as the Housing Authority of the County of Los Angeles. Under this program, low-income households are provided the differential between the rental rate of a unit and what they can afford. The rental rate cannot exceed fair market rent for the area as established by HUD.  <b>Responsibility:</b> Los Angeles Community Development Commission; Publicized by City Community Development Department  <b>Funding:</b> Federal Section 8 funds</p>	<p><b>Progress:</b> The Redondo Beach Housing Authority administers the Section 8 Rental Assistance Program for the City. Currently, there are five Section 8 vouchers administered in the City. There are various internet resources dedicated to advertising Section 8 housing units in many jurisdictions. Due to limitations in resources, the City periodically monitors the internet to ensure that dwelling units accepting the Section 8 program are visible.  <b>Effectiveness:</b> Staff continues to publicize availability of resources when requested. Can continue the program and enhance the City’s website with information.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Schedule:</b> Ongoing. Publicize to landlords and tenants via City newsletter, link on City website or other means.</p> <p><b>Objective:</b> Facilitate rent subsidies for very-low- and extremely-low-income residents through Section 8 vouchers.</p>	<p><b>Appropriateness:</b> Update program to include a quantifiable objective and enhance City’s website.</p>
<p><b>Policy 7. Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color, and for special needs groups.</b></p>	
<p><b>Program 7a. – Continue to participate in area-wide programs to ensure fair housing.</b> The City will continue to contract with Fair Housing organizations to process complaints regarding housing discrimination within the City, and to provide counseling in landlord/tenant disputes.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General fund/CDBG</p> <p><b>Schedule:</b> Ongoing, annual review</p> <p><b>Objective:</b> Address 100 percent of fair housing complaints</p>	<p><b>Progress:</b> The City contracts with the Housing Rights Center and continues to disseminate its contact information when fielding associated complaints. The Housing Rights Center assisted the following number of residents each fiscal year during the 5th Cycle with discrimination inquiries and tenant/landlord services related to general housing issues, including eviction, tenant/landlord general information, lease terms, notices, repairs, security deposits, substandard conditions, and utilities:</p> <ul style="list-style-type: none"> <li>• 2014–2015: 14 residents</li> <li>• 2015–2016: 11 residents</li> <li>• 2016–2017: 15 residents</li> <li>• 2017–2018: 14 residents</li> <li>• 2018–2019: 16 residents</li> <li>• 2019–2020: 6 residents</li> <li>• 2020–2021: 12 residents</li> </ul> <p>Total: 88 residents*</p> <p>*See additional details in Appendix D, Affirmatively Furthering Fair Housing.</p> <p><b>Effectiveness:</b> All housing-related complaints are directed to the Housing Rights Center.</p> <p><b>Appropriateness:</b> The program is effective and will be revised to support and engage in the Regional Analysis of Impediments to Fair Housing, develop outreach material related to fair housing practices for developers, and create a procedure that prompts fair housing administration for development decisions.</p>
<p><b>Program 7b. – Provide for the housing needs of seniors.</b> The Manhattan Village Senior Villas, located at 1300 Park View Avenue, was first occupied in 1997. This project consists of 104 senior housing apartments. As a condition of the project's approval, 20% of the units must be reserved for very-low income</p>	<p><b>Progress:</b> All 81 affordable units have been preserved during this planning period.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>households, 20% must be reserved for low-income households, and 40% of the units must be reserved for moderate-income households. The remainder (20%) of the units may be rented at a market-rate. The occupants of the senior housing project must consist of a householder 62 years of age or older, or 55 years of age or older if handicapped, according to criteria established by the Americans With Disabilities Act (ADA) of 1990 or the Federal Rehabilitation Act of 1973. This program is concerned with ensuring that the current affordability of the project is being maintained.</p> <p>Implementation: No additional funding and/or staffing will be required or are anticipated with this program's continued implementation. The City will continue to inform the public of this program.</p> <p><b>Responsibility:</b> California Housing Finance Agency</p> <p><b>Funding:</b> State of California</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> Preserve 81 affordable senior units</p>	<p><b>Effectiveness:</b> The program is effective, as the City has experienced zero loss of affordable units, and will continue.</p> <p><b>Appropriateness:</b> While the project’s affordability agreement with the City does not expire, the program will be revised to include that the City should make contact with the owners of Manhattan Village Senior Villas, and continue to monitor and enforce affordability throughout the planning period.</p>
<p><b>Program 7c. – Provide for the special needs of seniors so that they may remain in the community.</b></p> <p>The Senior Care Management program provides services to predominantly low-income seniors. This program is operated by a part-time Senior Services Care Manager who is contracted through the Beach Cities Health District and the City of Manhattan Beach Fire Department. At any given time, the Senior Services Program may assist up to 110 senior citizens, of whom 70% are low-income. As liaison and service coordinator, the Senior Services Care Manager performs the following functions:</p> <ol style="list-style-type: none"> <li>1. Locates suitable (often more affordable) housing. This may include referrals to "board and care" residential facilities in Manhattan Beach, or multi-family apartments;</li> <li>2. Identifies financial assistance resources, including HUD Section 8 rental vouchers through Los Angeles County, and other federal assistance programs, as well as disbursing information and referring to lenders for special mortgage programs;</li> <li>3. Coordinates "Rotary Cares," a volunteer program, which rehabilitates two senior homes per year, consisting of minor repairs, plumbing, carpentry, painting, etc.,</li> <li>4. Arranges and makes referrals for health and personal services for the Senior Health Program, which is funded by the Beach Cities Health District "Community Care Services" and other community resources available for older adults; and,</li> </ol>	<p><b>Progress:</b> The City continues to contract with Beach Cities Health District for Care Management needs (<a href="https://www.bchd.org/home-services-care-management">https://www.bchd.org/home-services-care-management</a>).</p> <p>Additionally, the Parks and Recreation Department has a full-time Older Adults Program Supervisor, plus support staff, who provides these services and numerous programs to older adults (<a href="https://www.manhattanbeach.gov/departments/parks-and-recreation/older-adults-program">https://www.manhattanbeach.gov/departments/parks-and-recreation/older-adults-program</a>).</p> <p>In 2020, the City re-focused its efforts on ensuring that vulnerable older adults were connected with assistance in receiving essential items by establishing a Senior Hotline. From April 2020 through May 2021 there were 1,009 callers to the Senior Hotline. The callers received information and referrals, and many were connected to the volunteers with community partners like the Community Emergency Response Team, Rotary, and the Beach Cities Health District for help with the delivery of essential items like groceries, household items, and prescriptions. The City also offers Dial-a-Ride services. Although Dial-a-Ride services were limited during 2020 and 2021, there are 1,211 Dial-a-Ride riders.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>5. Informs eligible low-income seniors of state and utility company programs (Southern California Edison and Southern California Gas Company) regarding discounts, weatherization services, and payment assistance.</p> <p>As discussed above, it is suggested that a shared housing program also be established, expanding responsibilities under No. 1 above. The City also provides funds for social service groups serving seniors, including the Salvation Army brown bag food program, Care Management for Manhattan Beach Seniors, and South Bay Adult Care Center.</p> <p><b>Responsibility:</b> Fire Department/Senior Services Care Manager  <b>Funding:</b> General Fund/Beach Cities Health District/CDBG Funds  <b>Schedule:</b> On-going; add shared housing program in 2014  <b>Objective:</b> Maintain part-time Senior Services Care Manager</p>	<p><b>Effectiveness:</b> This program is effective and should be continued. The older adults of the community regularly rely on these resources for services and programming.</p> <p><b>Appropriateness:</b> The program remains appropriate and will be continued, with revision to the funding sources.</p>
<p><b>Program 7d. – Reasonable accommodation for persons with disabilities.</b>  Pursuant to SB 520, the City will continue to implement the Municipal Code procedures for reviewing and approving requests for reasonable accommodation in housing from persons with disabilities and monitor the results of the program as part of the annual General Plan report.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> General Fund  <b>Schedule:</b> Throughout the planning period  <b>Objective:</b> Continue to implement procedures for ensuring reasonable accommodation</p>	<p><b>Progress:</b> The City continues to implement Reasonable Accommodation policies, and received and approved one request during the planning period.</p> <p><b>Effectiveness:</b> The program is effective and should be continued.</p> <p><b>Appropriateness:</b> Program will be revised to remove any potential constraints related to the approvals process in the City’s Reasonable Accommodation Ordinance.</p>
<p><b>Program 7e. – Emergency shelters and transitional/supportive housing.</b>  The Zoning Code allows emergency shelters “by-right” subject to appropriate development standards consistent with SB 2 in the Public &amp; Semi-Public (PS) and Industrial Park (IP) zones. These zones include vacant and underutilized parcels that could support emergency shelters. Sites in this zone also have good access to transit and other services.</p> <p>Transitional housing is defined in <i>Health and Safety Code</i> Section 50675.2 as rental housing for stays of at least six months but where the units are re-circulated to another program recipient after a set period. Transitional housing may be designated for a homeless individual or family transitioning to permanent housing. Transitional housing that is group housing for six or fewer persons is permitted by-right as a regular residential use where residential use is permitted. Transitional housing that is group housing for seven or more persons is conditionally permitted as residential care facilities in RM and RH zones. Transitional housing not configured as group housing as described</p>	<p><b>Progress:</b> The Zoning Code includes provisions for emergency shelters and transitional/supportive housing. No emergency shelter or transitional/supportive housing applications were submitted during the planning period.</p> <p><b>Effectiveness:</b> The City should continue to facilitate the program and make these options available in the event that an application is submitted.</p> <p><b>Appropriateness:</b> Revise to comply with current State law, including adding Low-Barrier Navigation Center requirements.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>above is permitted as a residential use subject to the same permitting processes and requirements as other similar housing types in the same zones.</p> <p>Supportive housing is permanent housing with an on- or off-site service component. Supportive housing that is group housing for six or fewer persons is permitted by-right as a regular residential use where residential use is permitted. Supportive housing that is group housing for seven or more persons is conditionally permitted as residential care facilities in RM and RH zones. Supportive housing not configured as group housing is permitted as a residential use subject to the same permitting processes and requirements as other similar housing types in the same zones.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> General Fund  <b>Schedule:</b> Throughout the planning period  <b>Objective:</b> Continue to facilitate the provision of emergency shelters, transitional and supportive housing in compliance with SB 2. Program results will be monitored as part of the annual General Plan Progress report.</p>	
<p><b>Goal 3. Provide a safe and healthy living environment for City residents.</b></p>	
<p><b>Policy 8. Eliminate potentially unsafe or unhealthy conditions in existing residential development.</b></p>	
<p><b>Program 8a. – Continue the active code enforcement program for illegal and substandard units.</b></p> <p>The City has an active Code enforcement program that responds to complaints of substandard structures. In addition, a Report of Residential Building Records is required each time a property is sold, which serves to alert all parties to unpermitted and potentially substandard construction that may exist.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Respond to 100 percent of reports of substandard units</p>	<p><b>Progress:</b> The City continued to investigate 100% of reports of code violations and substandard housing. Residential Building Records reports continue to be required with each property sale.</p> <p><b>Effectiveness:</b> Both components of this program are effective and will be continued.</p> <p><b>Appropriateness:</b> Continue and incorporate Code Enforcement’s efforts related to substandard housing conditions, and related resources for residents related to attenuation of those issues.</p>
<p><b>Goal 4. Encourage the conservation of energy in housing.</b></p>	
<p><b>Policy 10. Encourage the use of alternate energy.</b></p>	
<p><b>Program 10. – Waive fees for installation of solar panels.</b></p> <p>Solar panels may be used on roofs of residential and commercial structures to generate electricity that is either transmitted to the grid or stored in batteries on-site. The existing height limits in Manhattan Beach ensure rooftop units would not eventually be subject to shade and shadow, which would render them ineffective.</p>	<p><b>Progress:</b> Solar permits are subsidized by the City. The current permit fee for solar panels is \$100. During the planning period, the City issued over 800 solar permits.</p> <p><b>Effectiveness:</b> The program is effective and should be continued.</p>



**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>Since 2008, in order to encourage use of alternate energy the City has waived any building fees for photovoltaic panels.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General Fund</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> Process permits for new solar panels at no cost.</p>	<p><b>Appropriateness:</b> Continue; program remains appropriate.</p>
<p><b>Policy 11. Reduce energy loss due to inferior construction/development techniques.</b></p>	
<p><b>Program 11a. – Enforce green building techniques.</b></p> <p>The City has adopted the California Energy Code. In addition, the City requires the following:</p> <ul style="list-style-type: none"> <li>• Insulating hot water pipes to minimize energy loss</li> <li>• Using caulk and insulation that are formaldehyde-free or contain low VOC (volatile organic compounds)</li> <li>• Pre-plumb water piping and sensor wiring to the roof for future solar water heating</li> <li>• Use duct mastic on all duct joints and seams to minimize energy loss</li> <li>• Install "Energy Star" bath fans vented to the outside</li> <li>• Energy efficient water fixtures</li> </ul> <p>The City continues to review its codes to encourage greener building techniques. The United States Green Building Council continues to review more intensive measures to be included in buildings for LEED certification. The City reviews standards through the Environmental Task Force and will continue to review and update its codes as updates become available.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General Fund</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> 100 percent compliance for new units</p>	<p><b>Progress:</b> The City continues to implement this program. In 2019, the City adopted the 2019 California Green Building Standards Code and the 2019 California Energy Code, which continue to be in effect through today. Furthermore, the City Council has expressed interest in pursuing green building techniques above and beyond State requirements, a task currently being undertaken by the City’s Sustainability Division.</p> <p><b>Effectiveness:</b> 100% of projects are required to comply with the adopted codes. The City is preparing to update the codes in the next 2 years in accordance with anticipated State code updates.</p> <p><b>Appropriateness:</b> Continue; program remains appropriate.</p>
<p><b>Program 11b. –Encourage water conservation.</b></p> <p>Massive amounts of energy are utilized in pumping water to southern California. Any measures to conserve water will therefore help conserve energy. This can be achieved through use of low-flow fixtures and use of drought-tolerant landscaping. Sections 7.32 and 10.52.120 of the Municipal Code address landscaping, tree preservation, tree planting, and drought-tolerant landscaping. City codes provide for waterless urinals. Similar to solar panels, inspection and permit fees for installation of such urinals should be waived, when they are used to replace older, water-wasting urinals.</p> <p><b>Responsibility:</b> Community Development Department</p>	<p><b>Progress:</b> Water conservation requirements apply to 100% of projects that the City approves. Water conservation requirements are built into Title 9 via the Green Building Code, and Title 10 via State Water Efficient Landscape Ordinance requirements.</p> <p><b>Effectiveness:</b> The program is effective and should be continued. The City anticipates State Green Building Codes being updated in the next 2 years, at which point the City will also update its regulations.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Funding:</b> General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Reduced water consumption</p>	<p><b>Appropriateness:</b> Continue; program remains appropriate.</p>
<p><b>Policy 12. Encourage reduction in energy consumption for commuting to work and other activities.</b></p>	
<p><b>Program 12 – Provide a balance of residential and employment-generating uses in the City, including mixed-use projects.</b>            Where individuals have an opportunity to live in close proximity to their work, vehicle miles traveled to and from work can be reduced, thus reducing energy consumption. The City has permitted the development of mixed uses in Manhattan Village and permits the development of residential uses in commercial districts downtown and along Manhattan Beach Boulevard. In addition, the commercial areas of the City are in close proximity to residential districts, thus providing the potential that residents may walk to work or to shopping, dining out or other activities, or only drive a short distance.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> General Fund  <b>Schedule:</b> On-going.  <b>Objective:</b> Continue to encourage mixed use projects</p>	<p><b>Progress:</b> Mixed-use continues to be allowed in various zoning districts within the City. General Plan Land Use Element policies regarding mixed-use continue to encourage this type of development.  <b>Effectiveness:</b> Three mixed-use projects were approved during the planning period. However, this program does not have a quantifiable objective. Instead the City will commit to increasing opportunities for mixed-use development through the Adequate Sites program, and by clarifying and creating multifamily and mixed-use streamlined permitting procedures and development standards.  <b>Appropriateness:</b> The program will be replaced with an Adequate Sites program to increase the opportunities in the City for mixed-use and multifamily development in the mixed-use zones (CL, CD, CNE).</p>

The California Department of Housing and Community Development identifies the total number of homes for which each region in California must plan in order to meet the housing needs of people at all income levels for each planning period. Every local government is allocated a portion of the region’s housing needs, or RHNA, by their associate of governments. The City’s RHNA for the 5th Cycle planning period and the City’s progress in achieving the housing need’s objectives is provided in **Table 2**.

Table 2. Progress in Achieving Objectives for 5th Cycle RHNA (2014–2021)		
Program Category	5th Cycle RHNA (number of units)	Progress 2013–2020
New Construction*		
Extremely Low-Income	5	—
Very Low-Income	5	—
Low-Income	6	—
Moderate-Income	7	—
Above Moderate-Income	15	419
<b>Total</b>	<b>38</b>	<b>419</b>
<small>RHNA = Regional Housing Needs Allocation            * Quantified objective and progress for new construction reflect the 2013–2021 period, consistent with the previous RHNA cycle, through December 2020.</small>		

## 2.1 Review of Programs Addressing the Housing Needs for the Population with Special Needs

The City’s 5th Cycle Housing Element included several programs to directly address housing for those with special needs and many programs that indirectly support housing for those with special needs.

Program 2b of the 5th Cycle directly supported older adults and those with disabilities in the community. Program 2b was specifically focused on securing and using Community Development Block Grant (CDBG) funds or exchange funds for home improvement loans for low-income residents. Although it was not directly successful in achieving the objective tied to home improvement loans, the program was very successful in using CDBG funds to fund improvements for older adults and people with disabilities. The City used its CDBG allocation to fund infrastructure improvements, specifically installation of Americans with Disabilities Act (ADA)-compliant curb ramps throughout various City intersections. Most recently, CDBG funds were allocated to support the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, and ADA-compliant curb ramp and gutter to create unobstructed paths of travel and accessibility for older adults and residents with disabilities to Manhattan Senior Village Villas.

The City recognizes that many existing non-governmental constraints, such as the small parcel sizes and built-out nature of the City, may act as a barrier to development for housing needed to serve the population with special needs. However, the City implemented several programs from the 5th Cycle Housing Element that were successful in mitigating barriers and helping to address the housing needs of the populations with special needs. Specifically, through implementation of Program 5a – Provide incentives for housing affordable to low-income households and senior housing, the City continued to

incentivize development of affordable housing by abiding by the local and State density bonus regulations. Additionally, through the lot consolidation incentive through Program 3b – Facilitate multi-family residential development in the CL, CD, and CNE commercial districts, the City provided an additional density bonus incentive under Section 10.12.030 of the Manhattan Beach Municipal Code above and beyond what is permitted under State law in exchange for lot consolidation. Currently one density bonus project is in review and a second is pending submittal, including several very low-income units, helping to increase housing opportunities for some of the households that may be most vulnerable to facing worst-case needs.<sup>1</sup>

In addition, several programs, including Program 5b – Streamline the development process to the extent feasible, aimed to provide a streamlined approval process as a means of facilitating a variety of housing types that may be suitable for people with special needs. The programs were effective in providing a streamlined approval process for residential projects that qualify for a density bonus under State density bonus law, further incentivizing housing for those with special needs, including older adults, extremely low-income households, and lower-income students. While not all components of the programs were fully implemented, the City is carrying forward several of those components and committing to implement them during the 6th Cycle.

The City's 5th Cycle Housing Element also included several programs to allow for a variety of housing types that can provide housing opportunities for those with special needs, including Program 5c – Allow the establishment of manufactured housing on single-family residential lots, Program 5e – Allow second units in residential areas, and Program 7e – Emergency shelters and transitional/supportive housing. In particular, Program 5e included a Zoning Code amendment to adopt a local Accessory Dwelling Unit Ordinance. Accessory dwelling units can provide opportunities for those with special needs, such as older adults or people with disabilities, including developmental disabilities, by creating housing that is in an independent setting while still allowing for support from caregivers who reside on the same lot. The program has proven to be very effective. While three accessory dwelling unit permits were issued and constructed 2017 through 2019, from January 2020 to October 2021, the City issued 11 permits, and 22 applications are currently (October 2021) under City review.

The following are other programs from the 5th Cycle that were effective in providing direct and/or indirect support for those with special needs:

- Program 6a – Continue to participate in Los Angeles County Housing Authority programs, and publicize availability of Section 8 rental assistance for households in the City, which supports very low-income families, older adults, and those with disabilities by providing financial support to assist with rent payments.
- Program 7a – Continue to participate in area-wide programs to ensure fair housing. Through this program, the City continued to contract with the Housing Rights Center to provide residents, including people who have special needs, support with fair housing–related issues. The Housing Rights Center assisted residents with discrimination inquiries and tenant/landlord services related to general housing issues, including eviction, tenant/landlord general information, lease terms,

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<sup>1</sup> The United States Department of Housing and Urban Development defines households with worst-case needs as very low-income renters who do not receive government housing assistance and who pay more than 50 percent of their income for rent, live in severely inadequate conditions, or both.

notices, repairs, security deposits, substandard conditions, and utilities. The program was effective, but will be revised to play a more active role in affirmatively furthering fair housing through the support and engagement in the Regional Analysis of Impediments to Fair Housing, development of outreach materials related to fair housing practices for developers, and the creation of a procedure that prompts fair housing administration for development decisions.

- Program 7b – Provide for the housing needs of seniors. Program 7b was effective in preserving 81 affordable units for very low-, low-, and moderate-income residents, and older adults with disabilities. In addition, the City recently approved an assisted living project for older adults consisting of 95 rooms (115 total beds), a facility kitchen, and common areas. The project will include 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss.
- Program 7c – Provide for the special needs of seniors so that they may remain in the community. Program 7c was extremely effective in serving thousands of older adults through a variety of support services, programs, and classes.
- Program 7d – Reasonable accommodation for persons with disabilities. This program was effective as the City continues to implement Reasonable Accommodation policies, and will be further evaluated in the 6th Cycle to remove any potential constraints that may still exist.
- Program 8a – Continue the active code enforcement program for illegal and substandard units. Program 8a addressed reports of possible code enforcement violations from residents, and, through referrals to the County of Los Angeles Environmental Health Division, addressed rental housing enforcement conditions/inspections for reports of possible substandard housing conditions. This program was effective in providing services to renters who may often be residents with special needs.

In addition, while not included as a 5th Cycle housing program, in 2017, the County of Los Angeles passed Measure H, which created significant new resources to address homelessness, including providing to local jurisdictions the opportunity to apply for City Homelessness Plan Implementation Grants. In October 2017, a total of 47 cities were awarded grants, including the City of Manhattan Beach. The City intended to use its \$330,666 grant to coordinate with other jurisdictions, including the County of Los Angeles, local stakeholders, and neighboring cities, to address homelessness in the community. The City recognized this would only be accomplished through an active constituency working together, including government, businesses, and the faith community, to tackle the causes of homelessness and implement solutions.

In August 2018, the City Council adopted the City’s Five-Year Plan to Address Homelessness in Our Community, and appointed a Homelessness Task Force. The plan, available on its website, contains goals aligned with the City’s and County of Los Angeles’ objectives to address homelessness. The plan also contains an outline of collaborative opportunities, and demonstrates a correlation between the City’s efforts and the County of Los Angeles’ Homeless Initiative Strategies. In November 2018, at the recommendation of the Homelessness Task Force, the City submitted a multi-jurisdictional proposal with the Cities of Redondo Beach and Hermosa Beach (all three collectively referred to as the “South Bay Beach Cities”) to the County of Los Angeles for outreach and education, coordination of regional efforts to address homelessness, and housing navigation services. In April 2019, the Los Angeles County Homeless Initiative announced the award of Measure H grant funding to the South Bay Beach Cities totaling \$330,665 toward homeless coordination, training, and housing navigation services.

In September 2019, the City, along with regional partners the Cities of Redondo Beach and Hermosa Beach, solicited proposals from qualified homeless service providers. Subsequently, the City Council awarded a subcontract to Harbor Interfaith Services to provide three full-time-equivalent positions to assist individuals and families experiencing homelessness in the South Bay Beach Cities. Harbor Interfaith Services was established in 1987 and provides a variety of services to individuals and families, including a 90-day emergency shelter, 18-month transitional housing program, and a Family Resources Center. The City continues to provide information regarding services available for those experiencing homelessness on its website via its Homeless Resource Guide.

New programs identified in the 6th Cycle Housing Element will continue striving to specifically address housing needs and the concerns of residents with special needs.

# Appendix B: Needs Assessment

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# 1 Introduction

The Needs Assessment examines general population and household characteristics and trends, such as age, race and ethnicity, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock (e.g., number of units and type, tenure, age and condition, cost) are also addressed. Finally, the projected housing growth needs for the City of Manhattan Beach (City) based on the 2021–2029 Regional Housing Needs Allocation are examined.

The Housing Needs Assessment uses the most recent available data from the U.S. Census, California Department of Finance, California Employment Development Department, Southern California Association of Governments, and other relevant sources. Supplemental data was obtained through field surveys.

# 2 Overview

Manhattan Beach is located within the southwestern coastal portion of Los Angeles County in what is commonly referred to locally as the “South Bay” (**Figure 1, Regional Map**). To the north is the City of El Segundo, to the east is Redondo Beach and the City of Hawthorne, to the south is Hermosa Beach, and to the west is the Pacific Ocean. The City has a total land area of 2,483 acres (3.88 square miles).

The City is made up of several distinct neighborhoods that are grouped into “planning areas” that reflect the City’s unique and varied environment (**Figure 2, Planning Areas**). These planning areas are as follows:

- **Beach Area.** This area contains most of the City’s multifamily rental housing. Lots in this area are small, with generally less than 3,000 square feet, and parking for residents and visitors is in short supply. The City’s General Plan calls for the maintenance and enhancement of the “Village” atmosphere within the downtown commercial district. The City’s goal is to promote the preservation of the small specialty retail and service activities that serve both visitors to the beach and local residents while also encouraging mixed-used residential/commercial development.
- **Hill Section.** This area consists primarily of single-family residential development, with commercial and higher-density residential development limited to Sepulveda Boulevard and Manhattan Beach Boulevard. Higher-density, multifamily residential development is directed to those parcels located on either side of Manhattan Beach Boulevard, which is already developed with a mix of commercial and multifamily residential uses.
- **East-Side/Manhattan Village.** This includes all of the City’s land area located east of Sepulveda Boulevard, and a large proportion of the City’s commercial and residential uses are within this area. Medium- and high-density residential development is located along Manhattan Beach Boulevard, Artesia Boulevard, and in areas adjacent to Manhattan Intermediate and Meadows schools, which are designated exclusively for multifamily residential development. Manhattan Village includes a substantial amount of regional commercial and office development, as well as a significant number of condominium units.

- **Tree Section.** This portion of the City is located east of Grandview Avenue and northwest of Valley Drive. A small portion of the area adjacent to Sepulveda Boulevard is designated for commercial uses.
- **El Porto.** This area was formerly the unincorporated community of El Porto and is located north of 38th Street between the ocean and the City of El Segundo. The area is developed with a mix of residential and commercial uses. El Porto has the highest residential development intensities found in the City. The General Plan protects the mix of multifamily and commercial development presently existing in this area.



Figure 1. Regional Map



Figure 1. Planning Areas

### 3 Data Sources

Various sources of information were consulted in preparing this Housing Needs Assessment for the General Plan Housing Element. The 2010 Census provides the basis for population and household characteristics. The following sources of information were used to supplement and update information contained in the 2000 and 2010 Census data:

- California Department of Finance’s 2010–2021 E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021
- Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy, 2013–2017
- California Department of Housing and Community Development (HCD) State Income Limits for 2021
- U.S. Census Bureau (Census) American Community Survey (ACS), 5-Year Estimates, 2019
- California Employment Development Department’s Long-Term Occupational Employment Projections, 2021
- U.S. Bureau of Labor Statistics – Standard Occupation Classification, 2020
- Los Angeles Homeless Services Authority (LAHSA) 2016–2020 Homeless Count Data by Community/City
- California Department of Developmental Services’ Quarterly Consumer Report, 2020
- California Department of Industrial Relations Minimum Wage, 2020
- HUD Fiscal Year 2000–2020 Fair Market Rents, 2020
- HUD Fiscal Year 2020 Income Limits Summary, 2020
- Southern California Association of Governments’ Pre-Certified Local Housing Data for the City of Manhattan Beach, 2020
- Southern California Association of Governments’ Adopted Growth Forecast, 2020

## 4 Population Characteristics

Housing needs are primarily influenced by population and employment trends. This section provides a summary of the changes to the population size, and age and racial/ethnic composition of the City.

### 4.1 Population Growth Trends

Manhattan Beach is one of 88 cities in Los Angeles County, the most populous county in the Southern California Association of Governments’ region. From 2000 to 2021, the population of Los Angeles County (County) increased by approximately 7 percent. **Table 1, Regional Population Trends (2000, 2010, 2020)**, provides a summary of population trends for counties in Southern California and their respective populations over the last two decades.

Table 1. Regional Population Trends (2000, 2010, 2020)			
County	2000	2010	2020
Imperial County	142,361	174,528	188,777
Los Angeles County	9,519,338	9,818,605	10,172,951
Orange County	2,846,289	3,010,232	3,194,332
Riverside County	1,545,387	2,189,641	2,442,304
San Bernardino County	1,709,434	2,035,210	2,180,537
San Diego County	2,813,833	3,095,313	3,343,355
Ventura County	753,197	823,318	842,886

Source: U.S. Census 1990 STF 1, 2000 SF 1, 2010 SF 1; CA DOF 2020

Manhattan Beach had a population of 35,058 in 2021. Manhattan Beach grew very slowly during the 2000s, having grown less than 4 percent from 2000 to 2010. Most of the growth that has recently occurred has consisted of density increases on existing parcels through demolition and replacement of existing homes. From 2010 to 2021, the City’s population remained stable, but with a slight decrease by about 0.22 percent. This is in contrast with the County, which grew by 3.14 percent between 2000 and 2010, and an additional 2.3 percent from 2010 to 2021 (see **Table 2, Population Trends (2000–2021)**). As an essentially built-out city, there continues to be few opportunities for growth, except through redevelopment/infill on existing parcels.

Table 2. Population Trends (2000–2021)					
	2000	2010	2020	Growth 2000–2010	Growth 2010–2021
Manhattan Beach	33,852	35,135	35,058	3.8%	(0.22%)
Los Angeles County	9,519,338	9,818,605	10,172,951	3.14%	2.3%

Source: CA DOF Table E-5, 2021

## 4.2 Age

One of the more significant indicators of future potential population growth trends is a population’s age characteristics. **Table 3, Population Age Groups (2019)**, summarize the age characteristics for key age groups of the City’s population in 2019, based off ACS Census data. Manhattan Beach has a relatively older population compared the rest of the County. The largest portion of residents in Manhattan Beach are adults 45 to 54 years of age (17 percent), but the number of older adults (65 years and older) is only slightly lower, at 16 percent of the population. The higher percentage of older adults is an important consideration for housing needs, as discussed in more detail in Section 6, Special Needs Populations.

Housing needs are influenced by the age characteristics of the population. Different age groups have different housing needs based on lifestyles, family types, income levels, and housing preference. Table 3 shows that the age distribution of the City’s population is older than the County as a whole, with Manhattan Beach’s population having a median age (44 years old) about 8 years older than the County. An older population has implications regarding the type and size of future housing needs, as well as accessibility.

<b>Table 3. Population Age Groups (2019)</b>				
Age Group	Manhattan Beach		Los Angeles County	
	Persons	Percent	Persons	Percent
Under 5 years	2,107	5.9%	611,485	6.1%
5 to 9 years	2,605	7.3%	596,485	5.9%
10 to 14 years	2,906	8.2%	627,199	6.2%
15 to 19 years	2,353	6.6%	641,814	6.4%
20 to 24 years	827	2.3%	717,692	7.1%
25 to 34 years	2,761	7.8%	1,623,246	16.1%
35 to 44 years	4,904	13.8%	1,379,814	13.7%
45 to 54 years	6,124	17.3%	1,355,625	13.4%
55 to 59 years	2,591	7.3%	629,508	6.2%
60 to 64 years	2,312	6.5%	562,724	5.6%
65 to 74 years	3,260	9.2%	758,833	7.5%
75 to 84 years	2,053	5.8%	393,364	3.9%
85 years and over	697	2.0%	183,781	1.8%
<b>Total</b>	35,500	100%	10,081,570	100%
<b>Median age</b>	44	—	36.5	—

Source: ACS DP05 5YR Estimates, 2019

## 4.3 Race and Ethnicity

According to ACS Census estimates, the majority of Manhattan Beach residents identified as White, Not Hispanic or Latino, at 73 percent. Residents who identify as Asian alone account for 13 percent of the population, and Hispanic or Latino (any race) account for 8 percent of the population. The racial and ethnic composition of the City differs from the County in that a lower proportion of City residents are Hispanic/Latino or other racial minorities; see **Table 4, Race/Ethnicity (2019)**.

<b>Table 4. Race/Ethnicity (2019)</b>				
Racial/Ethnic Group	Manhattan Beach		Los Angeles County	
	Persons	Percent	Persons	Percent
Not Hispanic or Latino	32,662	92.00%	5,193,136	51.50%
White alone	26,018	73.30%	2,641,770	26.20%
Black or African American alone	155	0.40%	790,252	7.80%
American Indian and Alaska Native alone	64	0.20%	20,831	0.20%
Asian alone	4,763	13.40%	1,454,769	14.40%
Native Hawaiian and Other Pacific Islander alone	34	0.10%	24,597	0.20%
Some other race alone	47	0.10%	32,413	0.30%
Two or more races	1,581	4.50%	228,504	2.30%
Hispanic or Latino (any race)	2,838	8.00%	4,888,434	48.5%
<b>Total</b>	<b>35,500</b>	<b>100%</b>	<b>10,081,570</b>	<b>100%</b>

Source: ACS DP05 5YR Estimates, 2019

#### 4.4 Employment

Housing needs are also influenced by employment characteristics. Significant employment opportunities within a city can increase demand for housing in proximity to jobs. **Table 5, Employment by Occupation (2019)**, shows that Manhattan Beach has 17,006 workers living within its borders who work across five major industrial sectors. In 2019, the largest industry to employ residents of Manhattan Beach was the Management, Business, Science, and Arts occupations industries, accounting for 69.8 percent of the labor force (see **Table 6, Labor Force (2019)**).

Employment is an important factor affecting housing needs within a community. The jobs available in each employment sector and the wages for these jobs affect the type and size of housing residents can afford. Employment and projected job growth have a significant influence on housing needs during this planning period.

<b>Table 5. Employment by Occupation (2019)</b>		
Occupation	Manhattan Beach	
	Persons	Percent
Civilian-employed population 16 years and over	16,138	100%
Management, business, science, and arts occupations	11,266	69.80%
Service occupations	747	4.60%
Sales and office occupations	3,380	20.90%
Natural resources, construction, and maintenance occupations	285	1.80%
Production, transportation, and material moving occupations	460	2.90%

Source: ACS DP03 5YR Estimates, 2019



<b>Table 6. Labor Force (2019)</b>				
Labor Force Status	Manhattan Beach		Los Angeles County	
	Persons	Percent	Persons	Percent
Population 16 years and over	27,331	100.0%	8,123,894	100.0%
In labor force	17,006	62.2%	5,253,694	64.7%
Civilian labor force	16,999	62.2%	5,249,298	64.7%
Employed	16,138	59.0%	4,929,863	60.7%
Unemployed	861	3.2%	319,435	3.9%
Armed Forces	7	0.0%	4,396	0.1%
Not in labor force	10,325	37.8%	2,870,200	35.3%

Source: ACS DP03 5YR Estimates, 2019

## 4.5 Projected Job Growth

**Table 7, Projected Employment Growth (2018–2028)**, shows projected employment growth by industry for Los Angeles County for the period 2018–2028. The greatest number of new jobs projected to be produced in the County over this 10-year period is expected to be in Personal Care and Service, Healthcare Practitioners and Support, Community and Social Service, Life/Physical/Social Sciences, Community and Social Services, and Food Preparation and Serving Related. According to recent Census data, about 93 percent of employed Manhattan Beach residents worked in the County, and 23 percent of all workers were employed within the City limits (see **Table 8, City Resident’s Workplace Location (2019)**).

<b>Table 7. Projected Employment Growth (2018–2028)</b>					
SOC Code*	Standard Occupation Classification Occupation Profiles – Major Groups	Annual Average Employment		Employment Change	
		2018	2028	Numerical	Percent
00-0000	All Occupations	4,842,300	5,269,800	427,500	8.8%
11-0000	Management	903,800	994,880	91,080	10.1%
13-0000	Business and Financial Operations	865,100	937,690	72,590	8.4%
15-0000	Computer and Mathematical	363,790	408,300	44,510	12.2%
17-0000	Architecture and Engineering	217,960	228,810	10,850	5.0%
19-0000	Life, Physical, and Social Science (scientists)	112,640	128,900	16,260	14.4%
21-0000	Community and Social Service (e.g., counselors, therapists, social workers, clergy)	275,070	319,800	44,730	16.3%
23-0000	Legal	166,140	182,530	16,390	9.9%

**Table 7. Projected Employment Growth (2018–2028)**

SOC Code*	Standard Occupation Classification Occupation Profiles – Major Groups	Annual Average Employment		Employment Change	
		2018	2028	Numerical	Percent
25-0000	Educational Instruction and Library	825,950	905,060	690	0.08%
27-0000	Arts, Design, Entertainment, Sports, and Media	644,050	692,130	48,080	7.5%
29-0000	Healthcare Practitioners and Technical	681,610	783,130	101,520	14.9%
31-0000	Healthcare Support	314,750	369,620	54,870	17.4%
33-0000	Protective Service (e.g., first responders, security guards, animal control)	339,620	372,060	31,440	9.3%
35-0000	Food Preparation and Serving Related	1,266,930	1,457,820	190,890	15.1%
37-0000	Building and Grounds Cleaning and Maintenance	401,140	431,450	30,310	7.6%
39-0000	Personal Care and Service (e.g., entertainment, amusement, animal care, beauty/nail salons, barbers)	1,033,020	1,364,300	331,280	32.1%
41-0000	Sales and Related	1,353,930	1,391,030	37,100	2.7%
43-0000	Office and Administrative Support	2,119,180	2,101,620	-17,560	-0.83%
45-0000	Farming, Fishing, and Forestry	16,720	15,130	-1,590	-9.5%
47-0000	Construction and Extraction	423,990	472,980	48,990	11.5%
49-0000	Installation, Maintenance, and Repair (e.g., electronics, telecommunications, vehicles, solar/wind)	393,540	407,560	14,020	3.6%
51-0000	Production (e.g., manufacturing, food processing, assembly, machinists)	712,800	646,310	-66,490	-9.3%
53-0000	Transportation and Material Moving	1,026,800	1,120,840	94,040	9.2%

Source: California Employment Development Department, Long-Term Occupational Employment Projections, 2021

\* Standard Occupation Classification – U.S. Bureau of Labor Statistics, 2020

Table 8. City Resident’s Workplace Location (2019)	
Workplace Location	Percent
Worked in state of residence	98.80%
Worked in county of residence	93.90%
Worked in place of residence	22.70%
Worked outside county of residence	4.90%
Worked outside state of residence	1.20%
Source: ACS S0801 5YR Estimates, 2019	

## 5 Household Characteristics

Housing needs in Manhattan Beach are primarily influenced by population and employment trends. This section provides a summary of the changes to the population size and age, and racial/ethnic composition of the City.

### 5.1 Household Composition and Size

Household characteristics are important indicators of the type and size of housing needed in a city. The Census defines a “household” as all persons occupying a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing a single unit. Persons in group quarters, such as dormitories, retirement or convalescent homes, or other group living situations, are included in population totals, but are not considered households.

Manhattan Beach had 13,427 households, as estimated by the ACS in 2019. **Table 9, Household Composition (2019)**, provides a comparison of households by type for the City and the County as a whole. Family households in 2019 comprised approximately 71 percent of all households in the City, 5 percent more than the County. The City’s average household size is lower than the County as a whole (2.64 persons per household vs. 2.96 persons per household for Los Angeles County). These statistics suggest that there is less need for large units in Manhattan Beach than in other areas of the County.

<b>Table 9. Household Composition (2019)</b>				
Household Type	Manhattan Beach		Los Angeles County	
	Households	Percent of Total Households	Households	Percent of Total Households
<b>Family Households</b>	9,581	71.3%	2,204,715	66.2%
–Husband-wife family	7,931	59.1%	1,488,600	44.7%
–With own children under 18 years	3,858	28.7%	610,365	18.3%
–Male householder, no wife present	759	5.6%	234,179	7.0%
–With own children under 18 years	348	2.6%	85,613	2.6%
–Female householder, no husband present	891	6.6%	481,936	14.5%
–With own children under 18 years	430	3.2%	196,097	5.9%
<b>Non-Family Households:</b>	3,846	28.6%	1,123,683	33.8%
–Householder living alone	3,034*	78.9%*	449,473*	40%*
<b>Households with Individuals Under 18 Years</b>	4,766	35.5%	1,051,774	31.6%
<b>Households with Individuals 65 Years and Over</b>	5,411	40.3%	1,328,031	39.9%
<b>Total Households</b>	13,427	100.0%	3,328,398	100.0%
<b>Average Household Size</b>	2.64	—	2.96	—

Source: ACS S1101 5YR Estimates, 2019  
\* Of total non-family households.

## 5.2 Housing Tenure

Housing tenure (owner vs. renter) is an important indicator of the housing market. Communities strive to have an adequate supply of units available both for rent and for sale to accommodate a range of households with varying incomes, family sizes and composition, and lifestyles. **Table 10, Household Tenure (2019)**, provides a comparison of the number of owner-occupied and renter-occupied units in the City in 2019 as compared to the County as a whole. Table 10 reveals a higher level of home ownership in the City, which is approximately 24 percentage points higher than the County.

Vacancy rates are an indicator of housing supply and demand. Low vacancy rates indicate greater upward price pressures and a higher rate indicates downward price pressure. In general, an optimal vacancy rate is 2 percent for owner-occupied housing and 4 percent to 6 percent for rental units in a mature community, which indicates a stable housing market. This level of vacancy is assumed to ensure sufficient residential mobility and housing choice while providing adequate financial incentive for rental owners and owners living in their home to maintain and repair their homes. In 2010, the vacancy rate in the City was about 1.7 percent, which is considered unstable.

<b>Table 10. Household Tenure (2019)</b>				
Housing Type	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
<b>Occupied Housing Units</b>	13,427	89.40%	3,316,795	93.60%
Owner-occupied housing units	9,344	69.60%	1,519,516	45.80%
Average household size of owner-occupied units	2.81	—	3.17	—
Renter-occupied housing units	4,083	30.40%	1,797,279	54.20%
Average household size of renter-occupied units	2.26	—	2.83	—
<b>Vacant Housing Units</b>	1,593	10.60%	226,005	6.40%
For rent	172	1.1%	63,242	1.8%
Rented, not occupied	86	0.57%	17,027	0.5%
For sale only	165	1.1%	16,209	0.46%
Sold, not occupied	274	1.8%	10,203	0.3%
For seasonal, recreational, or occasional use	640	4.3%	32,192	0.91%
All other vacant units	256	1.7%	87,132	2.5%
Homeowner vacancy rate	—	1.7%	—	1.0%
Rental vacancy rate	—	4%	—	3.4%
<b>Total Housing Units</b>	15,020	100%	3,542,800	100%

Sources: ACS DP04 5YR Estimates, 2019/ACS B25004 5YR Estimates, 2019

### 5.3 Overcrowding

Overcrowded housing units may be an indicator of potential housing problems. When a housing unit is occupied by a large number of persons, housing unit deterioration may be accelerated. According to the U.S. Census definition, a unit with more than one person per room is considered to be overcrowded, and housing units containing 1.5 persons or more per room are considered to be severely overcrowded. In this definition, “rooms” include living rooms, dining rooms, and bedrooms, but does not include the kitchen or bathrooms. Although some families with low incomes may willingly opt for overcrowded living arrangements to reduce spending, many lower-income residents often have no choice but to live in overcrowded housing. These overcrowded housing units place a strain on physical facilities and does not provide a satisfying living environment. Based on U.S. Census standards, Manhattan Beach residents live in relatively less-crowded housing conditions than the rest of Los Angeles County (see **Table 11, Overcrowding (2019)**). Recent Census data indicate that there were only 0.4 percent overcrowded owner-occupied units and 2.15 percent overcrowded renter-occupied units in Manhattan Beach. In the County, however, 2.53 percent of the owner-occupied units and approximately 16.21 percent of renter-occupied units are considered overcrowded.

<b>Table 11. Overcrowding (2019)</b>				
Occupants per Room	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
Owner-occupied units	13,427	100%	3,316,795	100%
1.01 to 1.50	59	0.44%	61,697	1.86%
1.51 to 2.00	0	0.00%	15,703	0.47%
2.01 or more	0	0.00%	6,891	0.20%
Renter-occupied units	4,083	100%	1,797,279	100%
1.01 to 1.50	51	1.24%	157,166	8.74%
1.51 to 2.00	37	0.91%	94,624	5.26%
2.01 or more	0	0.00%	39,831	2.21%

Source: ACS B25014 5YR Estimates, 2019

## 5.4 Household Income and Extremely Low-Income Households

HCD has identified the following income categories based on the area median income (AMI) of Los Angeles County. The AMI for the County in 2020 was \$77,300 for a hypothetical family of four.

- Extremely low-income: Households earning up to 30 percent of the AMI
- Very low-income: Households earning 31 to 50 percent of the AMI
- Low-income: Households earning 51 percent to 80 percent of the AMI
- Moderate-income: Households earning 81 percent to 120 percent of the AMI
- Above moderate-income: Households earning over 120 percent of the AMI

Household income is a primary factor affecting housing needs in a community. The ability of residents to afford housing is directly related to household income. According to recent Census data, the 2019 median household income in Manhattan Beach was \$153,023, more than double that of the County at \$68,044. See **Table 12, Median Household Income (2019)**.

<b>Table 12. Median Household Income (2019)</b>		
Jurisdiction	Median Income	Percent of Los Angeles County Median Income
Manhattan Beach	\$153,023	239%
Los Angeles County	\$68,044	100%

Source: ACS DP03 5YR Estimates, 2019

Per HCD requirements, local governments must identify those households that are considered to be extremely low income. Extremely low-income households are those with incomes that do not exceed 30 percent of the County’s median family income, according to HUD’s income limits. Households included in this category typically represent the lowest wage earners in a community, with wages corresponding to the current annual minimum wage of \$14.00 per hour for employers with 26 employees or more, and \$13.00 per hour for employers with 25 employees or fewer (as of January 1, 2021). The annual minimum wage is set to increase by \$1.00 per hour each year until reaching the annual minimum wage of \$15.00 per hour (all employers are set to reach this wage as of January 1, 2023). The annual wage figure cited

previously assumes full-time employment. **Table 13, Annual Income Limits for Los Angeles–Long Beach–Glendale Metro Fair Market Rent Area (2020)**, indicates the household income limits for the various lower-income categories (extremely low, very low, and low) in 2020, as calculated and provided by HUD’s 2020 State Income Limits in relation to the County’s median family income of \$77,300. These figures are arranged according to the number of persons who comprise a household. For example, as shown in Table 13, a household with one person is considered to be low income if the annual household income is \$63,100, and a household containing five persons is considered to be low income if its annual household income is \$97,350. The information included in Table 13 may be used to determine what percentage of a household’s income will be expended monthly for housing without being considered cost burden. For example, a household consisting of three persons with an annual income of \$50,700 ideally should not spend more than \$1,267.50 per month on housing costs. This figure represents 30 percent of that household’s annual income. According to HUD’s 2013–2017 Comprehensive Housing Affordability Strategy data, approximately 6 percent of households in the City are extremely low-income. Based on the City’s 6th Cycle Regional Housing Needs Allocation, there is a need for approximately 161 extremely low-income units during the planning period. Resources available to extremely low-income residents in the City, including the County Home Ownership Program for lower-income first-time buyers, Countywide affordable rental housing development programs, Section 8 Housing Choice Voucher Programs, and existing affordable housing stock available to extremely low-income households, are identified and fully described in **Section 7, Special Needs Population**, and throughout the Housing Element programs. To achieve the RHNA targets and meet the needs of extremely low-income residents, the City will implement numerous programs in the Housing Element that are aimed to address the needs of extremely low-income households.

See Programs 1, 3, 8, 9, 10, 12, 15, 16, 18, 21, 24 and 28 in the Housing Element for full program details.

<b>Table 13. Annual Income Limits for Los Angeles–Long Beach–Glendale Metro Fair Market Rent Area (2020)</b>			
Household Size	Extremely Low-Income Limit (30%)	Very Low-Income Limit (50%)	Low-Income Limit (80%)
1 person	\$23,700	\$39,450	\$63,100
2 persons	\$27,050	\$45,050	\$72,100
3 persons	\$30,450	\$50,700	\$81,100
4 persons	\$33,800	\$56,300	\$90,100
5 persons	\$36,550	\$60,850	\$97,350
6 persons	\$39,250	\$65,350	\$104,550
7 persons	\$41,950	\$69,850	\$111,750
8 persons	\$44,650	\$74,350	\$118,950

Source: U.S. Department of Housing and Urban Development, State Income Limits 2020.

## 5.5 Overpayment

As defined by HUD, households spending more than 30 percent of their income, including rent or mortgage payments and utilities, are generally considered to be overpaying, or “cost burdened.” Severe overpaying occurs when households pay 50 percent or more of their gross income for housing. Therefore, according to HUD, housing is considered affordable if the cost is no more than 30 percent of a household’s income. No more than 30 percent is considered a reasonable threshold for households to be able to afford other expenses, such as transportation, healthcare, and groceries.

According to HUD, approximately 84 percent of lower-income renter households and 55 percent of lower-income owner households were overpaying for housing; see **Table 14, Overpayment by Tenure (2017)**. The highest rates of overpayment were among very low- and extremely low-income households. Although homeowners enjoy interest and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burden can require families to double up, resulting in overcrowding and related problems.

<b>Table 14. Overpayment by Tenure (2017)</b>				
<b>Comprehensive Housing Affordability Strategy Income Category</b>	<b>Owners</b>		<b>Renters</b>	
	<b>Households</b>	<b>Percent</b>	<b>Households</b>	<b>Percent</b>
Extremely low-income households	460	—	300	—
Households overpaying	300	65.2%	235	78%
Very low-income households	500	—	120	—
Households overpaying	240	48%	104	87%
Low-income households	850	—	525	—
Households overpaying	455	53.5%	450	86%
<b>Subtotal: All Lower-Income Households</b>	<b>1,810</b>	<b>—</b>	<b>945</b>	<b>—</b>
<b>Subtotal: Households Overpaying</b>	<b>995</b>	<b>55%</b>	<b>789</b>	<b>83.5%</b>
Moderate-income households	520	—	285	—
Households overpaying	265	51%	200	70.2%
Above moderate-income households	6,990	—	2,985	—
Households overpaying	1,240	17.7%	445	15%

Source: U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy, based on the 2013–2017 ACS

**Table 15, Percent Income Spent on Rent (2021)**, shows the 2020 distribution of renter households by the percent of income they spend on rent. About 37 percent (1,420) of renter households in the City spend more than 30 percent of gross income on housing costs, and 17 percent (644) spend more than half of their income on housing costs.



Table 15. Percent Income Spent on Rent (2021)		
Percent of Income Spent	Number of Renter Households	Percent of Total Renter Households
<20%	1,284	33%
20–29%	1,162	30%
30–49%	776	20%
>50%	644	17%
<b>Total</b>	<b>3,866</b>	<b>100%</b>
Source: Southern California Association of Governments Pre-Certified Local Housing Data for City of Manhattan Beach, 2021		

The HUD-formulated Fair Market Rent schedule serves as a guide for the maximum rents allowable for those units receiving Section 8 assistance. HUD uses the Consumer Price Index and the Census Bureau housing survey data to calculate the Fair Market Rent for each area. **Table 16, Fair Market Rent Summary Los Angeles–Long Beach HUD Metro Fair Market Rent Area (2021)**, indicates the Fair Market Rents for one-, two-, three-, and four-bedroom units in the Los Angeles–Long Beach–Glendale Fair Market Rent Area in 2021. Very low- and extremely low-income households have a very difficult time finding housing without overpaying.

Table 16. Fair Market Rent Summary Los Angeles–Long Beach HUD Metro Fair Market Rent Area (2021)				
Efficienc	One Bedroom	Two Bedrooms	Three Bedrooms	Four Bedrooms
\$1,369	\$1,605	\$2,058	\$2,735	\$2,982
Source: U.S. Department of Housing and Urban Development (HUD), 2021				

## 6 Housing Stock Characteristics

This section presents an evaluation of the characteristics of the community’s housing stock, and helps in identifying and prioritizing needs. The factors evaluated include the number and type of housing units, recent growth trends, age and condition, tenure, vacancy, housing costs, affordability, and assisted affordable units at risk of loss due to conversion to market rates. A housing unit is defined by the Census Bureau as a house, apartment, mobile home, or group of rooms occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters.

### 6.1 Housing Type and Growth Trends

According to the California Department of Finance’s Population and Housing estimates, there were 15,043 housing units in Manhattan Beach in 2021, an increase of approximately 5 percent from 2012. Of the total housing stock in 2020, the majority, or 77 percent, was single-family detached units, and 23 percent was multifamily units. Mobile homes comprised the remaining 0.1 percent. **Table 17, Housing by Type (2012 and 2021)**, provides a breakdown of the housing stock by type, along with growth trends for the City compared to the County as a whole for 2012–2021. From 2012 to 2021, the City had an increase of 111 single-family units and a decrease of 24 multifamily units due to the replacement of existing duplexes with single-family residential structures that include at least one accessory dwelling unit.

Table 17. Housing by Type (2012 and 2021)						
Structure Type	2012		2021		Growth	
	Units	Percent	Units	Percent	Units	Percent
Manhattan Beach						
Single-family	11,510	77%	11,621	77%	111	0.96%
Multifamily	3,432	22.9%	3,408	22.7%	-24	-0.7%
Mobile homes	14	0.09%	14	0.09%	0	0%
Total units	14,956	100%	15,043	100%	87	5.8%
Los Angeles County						
Single-family	1,947,879	57.2%	1,971,020	54.5%	23,141	1.2%
Multifamily	1,447,968	41.9%	1,585,448	43.8%	137,480	9.5%
Mobile homes	58,284	1.7%	58,341	1.6%	57	9.8%
Total units	3,454,131	100%	3,614,809	100%	160,678	4.7%

Source: California Department of Finance Table E-5, 2021

## 6.2 Housing Age and Condition

The age of a housing unit is often an indicator of housing condition. In general, housing that is 30 years or older may exhibit need for repairs based on the useful life of materials. For example, housing that is 30 years old or older is typically in need of some major rehabilitation, such as a new roof, foundation, or plumbing. Many Federal and State programs also use the age of housing as one factor in determining housing rehabilitation needs. Housing older than 50 years is considered aged and is more likely to exhibit a need for major repairs. **Table 18, Age of Housing Stock (2019)**, shows the age distribution of the housing stock in Manhattan Beach compared to the County as a whole, as reported in recent Census data. The majority (28 percent) of housing stock in Manhattan Beach was built in 1950 through 1959.

Table 18. Age of Housing Stock (2019)				
Year Built	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
Built 2005 or later	432	3%	54,241	2%
Built 2000 to 2004	984	7%	109,255	3%
Built 1990 to 1999	1,567	10%	208,791	6%
Built 1980 to 1989	1,552	10%	403,248	12%
Built 1970 to 1979	1,637	11%	496,376	14%
Built 1960 to 1969	1,871	12%	518,500	15%
Built 1950 to 1959	4187	28%	722,473	21%
Built 1940 to 1949	1681	11%	396,035	12%
Built 1939 or earlier	1217	8%	516,817	15%
<b>Total units</b>	<b>15,128</b>	<b>100%</b>	<b>3,425,736</b>	<b>100%</b>

Source: ACS DP04 5YR Estimates, 2019

Further, factors that may be indicators of substandard housing include a lack of telephone service, lack of plumbing facilities, and a lack of complete kitchen facilities. In Manhattan Beach, 158 units lack telephone service, 48 units lack plumbing facilities, and 26 units lack complete kitchen facilities. While there may be overlap between these features, a high estimate of the number of units in need of rehabilitation and replacement is estimated at 232 units. However, a true representation of the number of units in need of rehabilitation or replacement is likely much lower and a more accurate estimate is detailed in local housing condition data. Local data compiled through the City’s Building Official records indicates that the number of units in need of rehabilitation or replacement is 10 units. Only one of those 10 units on record is considered to be in such disrepair that it is uninhabitable and is currently vacant, and three of those 10 units are single-family homes in need of structural repairs.

### 6.3 Housing Costs and Rents

High housing costs compared to household income can create housing challenges for households whose incomes fall below the AMI. When the housing stock does not meet the varying income needs of households at all income levels, housing affordability can become a burden on many households, especially those with limited earnings. This section evaluates housing cost trends in Manhattan Beach.

State law establishes five income categories for purposes of housing programs based on the AMI:

- Extremely Low (30 percent or less of AMI)
- Very Low (31 percent–50 percent of AMI)
- Low (51 percent–80 percent of AMI)
- Moderate (81 percent–120 percent of AMI)
- Above Moderate (over 120 percent of AMI)

Housing affordability is based on the relationship between household income and housing expenses. According to HUD and HCD, housing is considered “affordable” if the monthly payment is no more than 30 percent of a household’s gross income. In some areas, such as in Los Angeles County, these income limits may be increased to adjust for high housing costs.

**Table 19, Affordable Rental Housing Costs (2021)**, shows 2021 affordable rent levels for housing in Los Angeles County by income category. Based on State-adopted standards, the maximum affordable monthly rent for extremely low-income households is \$866, and the maximum affordable monthly rent for very low-income households is \$1,477. The maximum affordable monthly rent for low-income households is \$2,365, and the maximum affordable monthly rent for moderate-income households is \$2,400.

Table 19. Affordable Rental Housing Costs (2021)		
Income Category*	HCD-Adjusted Income Limit	Monthly Affordable Rent
Extremely Low: <30% AMI	\$35,450	\$866
Very Low: 31%–50% AMI	\$59,100	\$1,477
Low: 51%–80% AMI	\$94,600	\$2,365
Moderate: 81%–120% AMI	\$96,000	\$2,400
Above moderate: >120%	\$96,000+	\$2,400+
Source: California Department of Housing and Community Development (HCD) 2021 State Income Limits – April 2021		
* 2021 Los Angeles County Area Median Income (AMI) = \$80,000		

The median monthly rent estimates by the number of bedrooms in a housing unit is listed in **Table 20, Median Monthly Rent by Unit Size in Manhattan Beach**. According to the 2019 estimates, the most affordable rental would be a studio, or zero-bedroom unit. The median monthly rent for this type of unit is \$1,745 per month, or \$20,940 annually. The minimum annual income needed to afford a studio apartment without being burdened by the costs is \$69,800 annually. For comparison, a three-bedroom apartment would require a minimum household income of \$128,080 to not be burdened by housing costs. A larger family, such as ones with children, would have additional costs such as childcare and education. Thus, leaving appropriately sized units further out of reach for lower-income households.

Table 20. Median Monthly Rent by Unit Size in Manhattan Beach (2019)	
Unit Size	Median Gross Rent
Studio	\$1,745
1 Bedroom	\$2,027
2 Bedrooms	\$2,737
3 Bedrooms	\$3,202
4 Bedrooms	\$3,300
5 or More Bedrooms	\$3,250
Source: 2019 ACS 5-Year Estimates B25031	

## 6.4 Housing Price Trends

**Table 21, Value of Owner-Occupied Housing Units (2019)**, presents 2019 estimates of owner-occupied housing values in Manhattan Beach. In 2019, 88 percent were valued at \$1,000,000 or more. The median owner-occupied housing unit value is over \$2,000,000.

Table 21. Value of Owner-Occupied Housing Units (2019)	
Value (dollars)	Number of Units
Under \$50,000	201
\$50,000 to \$99,999	0
\$100,000 to \$149,999	59
\$150,000 to \$199,999	27
\$200,000 to \$299,999	50
\$300,000 to \$499,999	62
\$500,000 to \$999,999	702
\$1,000,000 or more	8,243
<b>Total</b>	<b>9,344</b>
Median Value: \$2,000,000+	
Source: 2019 ACS 5-Year Estimates DP04	

## 7 Special Needs Populations

Local Housing Elements must include an analysis of special housing needs because certain segments of the population have more difficulty in finding decent affordable housing due to special needs. This section identifies the special needs populations in the City, including persons with disabilities, older adults, large families and households, female-headed and single-parent households, farmworkers, and persons experiencing homelessness.

### 7.1 Persons with Physical and Developmental Disabilities

Physical and developmental disabilities can hinder access to traditionally designed housing units and potentially limit the ability to earn adequate income. Therefore, persons with disabilities often have special housing needs. Special exterior and interior design features are often needed to accommodate a tenant or homeowner with a disability. For example, door frames must be wider to accommodate wheelchairs, ramps are needed instead of stairs, handrails in bathrooms need to be installed, cabinet doors must be accessible, and light switches and other devices need to be within easy reach. The cost for retrofitting an existing structure may be thousands of dollars and be well beyond the reach of those households with lower incomes. The lack of housing to accommodate a person’s physical or developmental disabilities is even more pronounced when it comes to market-rate rental units. Unless such provisions are made for persons with a disability during original construction, such facilities will not likely be provided in a typical rental unit.

Persons with Disabilities

Disability types include individuals with hearing, vision, cognitive, ambulatory, self-care, or independent living difficulties. The U.S. Census and the ACS provide clarifying questions to determine persons with disabilities and to differentiate disabilities within the population. The ACS defines a disability as a report of one of the six disabilities identified by the following questions:

- Hearing Disability: Is this person deaf or does he/she have serious difficulty hearing?

- **Visual Disability:** Is this person blind or do they have serious difficulty seeing even when wearing glasses?
- **Cognitive Difficulty:** Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions?
- **Ambulatory Difficulty:** Does this person have serious difficulty walking or climbing stairs?
- **Self-Care Disability:** Does this person have difficulty dressing or bathing?
- **Independent Living Difficulty:** Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone, such as visiting a doctor’s office or shopping?

Households with members who have a physical or developmental disability are also often occupied by older adults. In the City, approximately 13 percent of people 65 years of age and older have at least one type of disability. In some cases, older adults may have more than one disability, which may make aging in place even more difficult (see **Table 22, Persons with Disabilities by Age in the City (2019)**).

<b>Table 22. Persons with Disabilities by Age in the City (2019)</b>		
Disability by Age	Persons	Percent
Age 5 to 17 – Total Persons	9,486	—
Hearing disability	23	0.2%
Visual disability	35	0.4%
Cognitive disability	89	1.2%
Ambulatory disability	11	0.1%
Self-care disability	0	0.0%
Independent living disability	0	0.0%
Age 18 to 64 – Total Persons	19,997	—
Hearing disability	77	0.4%
Visual disability	120	4.1%
Cognitive disability	352	0.05%
Ambulatory disability	185	0.9%
Self-care disability	198	0.9%
Independent living disability	292	1.5%
Age 65 and Older – Total Persons	6,010	—
Hearing disability	598	10.0%
Visual disability	247	4.1%
Cognitive disability	244	4.1%
Ambulatory disability	594	9.9%
Self-care disability	265	4.4%
Independent living disability	771	12.8%
Source: ACS S1810 5-Year Estimates 2019 Disability Characteristics		
Note: Totals may exceed 100% due to multiple disabilities per person.		

### Persons with Developmental Disabilities

According to the California Welfare and Institutions Code Section 4512, a development disability “means a disability that originates before an individual attains 18 years of age, is expected to continue indefinitely, and constitutes a substantial disability for that individual.” The term developmental disability “includes intellectual disability, cerebral palsy, epilepsy, autism, and other disabling conditions found closely related to intellectual disability.”

The California Welfare and Institutions Code also defines a “substantial disability” as “the existence of significant functional limitations in three or more of the following areas of major life activity, as determined by a regional center, and as appropriate to the age of the person”:

- Self-care
- Receptive and expressive language
- Learning
- Mobility
- Self-direction
- Capacity for independent living
- Economic self-sufficiency

In California, the State Department of Development Services provides community-based services to persons with developmental disabilities and their families through a Statewide system of 21 community-based, non-profit agencies known as regional centers. The Harbor Regional Center, located in the City of Torrance, serves the City of Manhattan Beach and is one of the 21 regional centers that provides a point of entry to services for people with developmental disabilities. These centers serve people of all ages with developmental disabilities and their families. In 2020, the Harbor Regional Center served over 15,000 clients. As of September 2021, there were approximately 283 persons in the City who have been diagnosed with a developmental disability and are receiving case management services at the Harbor Regional Center, consisting of 159 residents between 0 to 17 years old and 124 residents 18 years and older. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent; therefore, based on the number of people who are diagnosed and receiving treatment, the City is below this threshold by 242 persons.

Because disabilities include a wide range and severity of sensory, physical, mental, and developmental conditions, the special needs of persons with disabilities is wide ranging, as well. In addition to affordable and accessible housing, transportation, and proximity to services, many persons with disabilities need on-site support or even full-time care in a group home environment.

The following existing resources provide services for persons with disabilities in the City:

- Dial-A-Ride: essential transportation service for residents ages 55+ or disabled with destinations to most medical facilities and a variety of shopping destinations.
- General Relief (GR): A County-funded program that provides cash aid to indigent adults, and children in special circumstances who are ineligible for federal or State programs.

- In-Home Supportive Services (IHSS): an alternative to out-of-home care, IHSS will help pay for services provided to individuals over 65 years of age, disabled (adult or child), or blind.
- Restaurant Meals Program: allows homeless, disabled, and elderly receiving CalFresh benefits to use their Golden State Advantage (EBT) cards to purchase meals from participating restaurants.
- Volunteers of America Greater Los Angeles: non-profit aiding with behavioral health services, veterans' services, and affordable housing.

In addition, communities, resources, and services for older adults can be found in **Section 7.2, Households Headed by Older Adults**. Communities, resources, and services for persons with disabilities seeking emergency housing assistance can be found in **Section 7.6, People Experiencing Homelessness**.

The City's Housing Element addresses persons with disabilities through various programs including **Program 4, Affordable Senior Housing Preservation**, which ensures the maintenance of existing affordable units for disabled persons ages 55 and older; **Program 5, Americans with Disabilities Act (ADA) Improvements Program**, which completes ADA-compliant infrastructure and repairs, contingent upon future CDBG funding; **Program 10, Countywide Affordable Rental Housing Development**, which provides financial assistance to supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles; **Program 15, Housing Choice Voucher Program**, which supports the provisions of five vouchers annually to facilitate rent subsidies for lower-income residents, including those with disabilities; **Program 21, Older Adults Programs**, which provides services such as Dial-A-Ride to residents with disabilities of all ages; **Program 25, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**, which amends the MBMC to eliminate potential barriers for persons with disabilities and provides materials and programs; and **Program 28, Specialized Housing Types to Assist Persons with Special Needs**, which includes numerous amendments to the City's Zoning Code to encourage special needs housing in the City and mitigate potential constraints to the development of housing for those with special needs.

## 7.2 Households Headed by Older Adults

HUD Federal housing programs define a household as an "elderly family" if the head of the household is at least 62 years of age or if two or more persons living together are all at least 62 years of age (24 CFR Section 5.403, Definitions). Typically, older adults are retired and have fixed incomes, and often have special needs related to housing location and construction. Even older adult homeowners, who are typically at an advantage because their housing payments may be fixed, are still subject to increasing utility rates and other living expenses. Moreover, many older adult residents may elect to remain in their own homes that are not designed to accommodate their special needs.

As shown in **Table 23, Older Adult Households by Tenure in the City (2019)**, there were 3,702 households (37 percent of total owners and 7 percent of total renters) in Manhattan Beach where the householder was 65 years or older.



<b>Table 23. Older Adult Households by Tenure in the City (2019)</b>				
<b>Householder Age</b>	<b>Owner</b>		<b>Renter</b>	
	<b>Households</b>	<b>Percent</b>	<b>Households</b>	<b>Percent</b>
Under 65 Years	5,921	63.4%	3,804	93.2%
65 to 74 Years	1,659	17.7%	141	3.5%
75 to 84 Years	1,234	13.2%	120	2.9%
85 years and Older	530	5.7%	18	0.4%
Total Households	9,344	100.0%	4,083	100.0%

Source: ACS B25007 5-Year Estimates, 2019

According to 2016 HUD CHAS data, there was a total of 4,160 older adult households in the City. Of those total households, approximately 8 percent earn less than 30 percent of the AMI (compared to 24 percent in the SCAG region), and approximately 18 percent earn less than 50 percent of the AMI (compared to 31 percent in the SCAG region). **Table 24** provides a summary of older adult households in the City by income category, relative to the surrounding area.

<b>Table 24. Older Adult Households by Income and Tenure in Manhattan Beach (2020)</b>				
<b>Income Category</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>	<b>Percent of Total Older Adult Households</b>
<30% HAMFI	225	105	330	7.9%
30%–50% HAMFI	370	45	415	10.0%
30%–50% HAMFI	455	75	530	12.7%
30%–50% HAMFI	360	30	390	9.4%
>100% HAMFI	2,330	165	2,495	60.0%
Total Households	3,740	420	4,160	100%

Source: SCAG 2020  
HAMFI = Housing Urban Development Area Median Family Income

Many older adults are dependent on fixed incomes and/or have a disability. Older adult homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs. Due to limited mobility, older adults typically need access to services (e.g., medical and shopping) and public transit. In terms of housing construction, older adults may need ramps, handrails, elevators, lower cabinets and counters, and special security devices to allow for greater access, convenience, and self-protection. The City recognizes that many older adults encounter temporary and permanent changes in their ability to conduct the tasks necessary for daily living. Programs of the City’s Housing Element aim to address those needs of older adult residents, including **Program 4, Affordable Senior Housing Preservation**, which aims to identify qualified affordable housing developers and maintain a reserve of affordable units for senior housing developments; **Program 5, Americans with Disabilities Act (ADA) Improvements Program**, which ensures ADA compliancy throughout the City; **Program 15, Housing Choice Voucher Program**, which continues a subsidized rent program for lower-income older adult residents; **Program 21, Older Adults Programs**, which provides and funds care and daily needs services for older adults; and

**Program 28, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities, which** aims to mitigate constraints for Residential Care facilities serving seven or more person, including facilities for older adults.

In addition to the programs in the Housing Element that aim to address the needs of older adults during the planning period, there are many existing resources, services, and housing developments available to older adults in the City. **Table 25, Communities, Resources, and Services for Older Adults**, provides a detailed overview of the existing resources, services, and housing developments available for older adults in the City.

To facilitate the development of senior housing, as defined by Section 51.3 of the California Civil Code, the City qualifies senior housing as a multifamily residential use and can be constructed in all zones that allow for multifamily residential development. See **Section 2.21, Senior Housing/Housing for Older Adults**, in **Appendix C**, for a discussion on the City's current zones that can accommodate housing developments for older adults.

**Table 25. Communities, Resources, and Services for Older Adults**

Community/Facility	Services
Joslyn Community Center 1601 North Valley Drive Manhattan Beach, CA 90266	<ul style="list-style-type: none"> <li>• Provides a variety of recreational activities, classes, and special programming for older adults.</li> <li>• Location for the Manhattan Beach Senior Club.</li> </ul>
<b>Skilled Nursing</b>	
Lawndale Healthcare & Wellness Centre 15100 Prairie Avenue Lawndale, CA 95014 310.679.3344	<ul style="list-style-type: none"> <li>• 59-bed nursing and rehabilitation facility, providing 24-hour care, seven days a week.</li> <li>• Long-term and short-term care. Services include a variety of therapies.</li> </ul>
Providence Transitional Care Center 4320 Maricopa Street Torrance, CA 90503 310.303.5900	<ul style="list-style-type: none"> <li>• 115-bed facility providing skilled nursing services to patients in a post-acute care setting.</li> </ul>
<b>Independent Living</b>	
Manhattan Beach Senior Villas 1300 Park View Avenue Manhattan Beach, CA 90266 310.546.4062	<ul style="list-style-type: none"> <li>• 104-unit affordable senior housing apartment for 65+ and 55+ for residents with disabilities persons 55+.</li> <li>• As a condition of the project’s approval and as part of a settlement agreement upon sale of the property, 20 percent of the units are offered for very low-income households, 20 percent for low-income households, and 40 percent for moderate-income households in perpetuity. The remaining 20 percent of units are for market rate.</li> </ul>
Heritage Pointe Senior Apartments 1801 Aviation Way Redondo Beach, CA 90278 310.318.8418	<ul style="list-style-type: none"> <li>• 135-unit apartment complex for 62+ lifestyles.</li> <li>• Includes a variety of community amenities such as a pool, library, clubhouse, and disability access.</li> </ul>
<b>Assisted Living</b>	
Josephine’s Garden Villa 521 North Rowell Avenue Manhattan Beach, CA 90266 310.606.2110 License # 198203121	<ul style="list-style-type: none"> <li>• Six private rooms, accommodating one person per room.</li> <li>• Services include continuous observations, care and supervision, daily needs assistance, medication management, and transportation.</li> </ul>
Mansel Guest Home 317 South Aviation Avenue Manhattan Beach, CA 90266 310.345.5561 License # 197607748	<ul style="list-style-type: none"> <li>• 6-bed, private home.</li> <li>• Provides customized care programs, as well as workout programs, medication services, activities, and home-cooked meals.</li> </ul>
Sunrise Senior Assisted Living 250-400 North Sepulveda Boulevard Manhattan Beach, CA 90266  Note: Project approved in 2021 and is expected to be completed in the planning period.	<ul style="list-style-type: none"> <li>• 95-room and 115-bed facility.</li> <li>• Includes common areas such as foyer, parlor, bistro, dining rooms, and activity rooms)</li> <li>• Offers 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss.</li> </ul>

### 7.3 Large Families and Households

As defined by HCD, large households are defined as having five or more persons living within the same household. Large households are considered a special needs group because they require larger bedroom counts. According to recent Census data, approximately 37 percent of owner households and 21 percent of renter households in Manhattan Beach had only one or two members. Approximately 1 percent of renter households had five or more members, and approximately 5 percent of owners had five or more members (**Table 26, Household Size by Tenure in the City (2019)**). This distribution suggests that the need for large units with four or more bedrooms is expected to be much less than for smaller units.

<b>Table 26. Household Size by Tenure in the City (2019)</b>				
<b>Household Size</b>	<b>Owner</b>		<b>Renter</b>	
	<b>Households</b>	<b>Percent</b>	<b>Households</b>	<b>Percent</b>
1 person	1,603	11.94%	1,433	10.67%
2 persons	3,322	24.74%	1,424	10.61%
3 persons	1,638	12.20%	491	3.66%
4 persons	2,064	15.37%	570	4.25%
5 persons	506	3.77%	120	0.89%
6 persons	160	1.19%	31	0.23%
7 persons or more	51	0.38%	14	0.10%
Total Households	9,344	100%	4,083	100%

Source: ACS B25009 5-Year Estimates, 2019

**Table 27. Median Household Income by Household Size** shows that the median household income increases as there are more persons in a household. As discussed in **Section 5.4, Household Income and Extremely Low-Income Households**, the median household income for a household of 3 persons or more is greater than the City’s overall median income. Additionally, the smallest household size will have a median household income that is greater than the Los Angeles County median income. According to **Table 13**, the median household income for any household size in the City is greater than the low-income limit of the same household’s size category.

<b>Table 27. Median Household Income by Household Size</b>	
<b>Household Size</b>	<b>Median Household Income</b>
1-Person Households	\$80,318
2-Person Households	\$146,724
3-Person Households	\$230,750
4-Person Households	\$250,000+
5-Person Households	\$250,000+
6-Person Households	\$221,369
7-or-More-Person Households	\$250,000+

Source: 2019 ACS 5-Year Estimates B19019

According to Census ACS estimates, most owner-occupied units have 1 occupant per room, with 59 units having up to 1.5 occupants per room, and no units with more than 1.5 occupants per room. Owner-occupied units, which is predominantly single-family homes, tend to have a sufficient number of rooms relative to household size. Furthermore, most renter-occupied units have 1 occupant per room, with 51 units having up to 1.5 occupants per room, and 37 units with 1.51 to 2 occupants per room. Renter-occupied units are more prone to overcrowding due to larger households. However, this number accounts for less than 1 percent of total housing units in the City. This indicates that there is an adequate supply of units with enough rooms relative to household size.

While the supply of larger units in the City might be sufficient, this does not include a measure of affordability. According to **Table 16**, the fair market rent for units with more than two bedroom increases to \$2,735 for a three-bedroom unit, and \$2,982 for a four-bedroom unit. Larger rental units tend to be more out of reach for lower-income household, which may explain the tendency to overcrowd. Based on the median household income for five- and six-bedroom households, it can be assumed that these rents would be affordable to most large-households in the City.

The City will continue to accommodate larger families and households through opportunities in the development of affordable housing and programs aimed to increase housing quality and capacity. Such examples of programs in the Housing Element include, **Program 2, Adequate Sites**, which establishes an overlay district to create opportunity for at least 406 units of multifamily housing for lower-income households plus an additional buffer of at least 73 units; **Program 9, Countywide Affordable Home Ownership Program**, which provides funding to lower-income households looking to purchase a home through down payment and closing costs assistance for single-family homes, condominiums, and townhomes through the County's Home Ownerships Program; **Program 10, Countywide Affordable Rental Housing Development**, which provides financial assistance to supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles; and **Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use Commercial Districts**, which streamlines the process by removing discretionary requirements and allows for the development and adoption of standards for multifamily residential housing in the CL, CD, and CNE zones.

## 7.4 Female- Headed and Single-Parent Households

Recent Census data reported that approximately 6 percent of owner households and 8 percent of renter households in Manhattan Beach were headed by single females (**Table 28, Household Type by Tenure in the City (2019)**). Approximately 4 percent of owner households were headed by single men, while 9 percent of renter households were headed by single men in the City. Single female- and male-headed households represent nearly a quarter of all households in the City (27 percent). This data is important when considering social service needs, such as childcare, recreation programs, and health care, which are of special concern to these households.

<b>Table 28. Household Type by Tenure in the City (2019)</b>				
<b>Household Type</b>	<b>Owner</b>		<b>Renter</b>	
	<b>Households</b>	<b>Percent</b>	<b>Households</b>	<b>Percent</b>
Married-couple family	6,488	69.4%	1,443	35.3%
Male householder, no spouse present	406	4.3%	353	8.6%
Female householder, no spouse present	568	6.1%	323	7.9%
Non-family households	1,882	20.1%	1,964	48.1%
Total Households	9,344	99.9%	4,083	99.9%
Source: ACS S2501 5-Year Estimates, 2019				

Female-headed households also tend to have comparatively low rates of homeownership, lower incomes, and high poverty rates, which often makes the search for affordable, decent, and safe housing more difficult. According to Census ACS data, 626 of the total 891 female-headed households had related children younger than 18 years. 20 percent (131 households) of those female-headed households with children were experiencing poverty in 2019, compared to less than 3 percent of total family households in the City who were experiencing poverty.

Childcare, early childhood education, and other family supportive services are particularly important for single female-headed households with children. These households can be assisted by many of the same strategies targeted to very low- and extremely low-income households in general with added resources and family support services.

### 7.5 Farm Workers/Employee Housing

The City is an urbanized community without any active agricultural activities. Recent Census data (ACS S2403 5-Year Estimates, 2019) indicates there were 26 farmworker individuals employed in “farming, fishing, forestry, and hunting occupations” in 2019. There is no farmworker-specific housing in the City.

The California Legislature enacted the Employee Housing Act to provide protection for persons living in privately owned and operated employee housing. The Employee Housing Act is specifically designed to ensure the health, safety, and general welfare of these residents, and to provide them a decent living environment. The Employee Housing Act also provides protection for the general public, which may be impacted by conditions in and around employee housing. According to the City, no known employee housing units as defined by the Employee Housing Act are located in the City.

### 7.6 People Experiencing Homelessness

In December 1993, the Los Angeles County Board of Supervisors and the Los Angeles Mayor and City Council established the LAHSA as an independent, Joint Powers Authority. LAHSA’s primary role is to coordinate the effective and efficient utilization of Federal and local funding in providing services to individuals experiencing homelessness in Los Angeles County. To support its mission, LAHSA oversees a comprehensive point-in-time count, with the most recent being completed in 2020 (HUD exempted LAHSA from conducting a 2021 point-in-time count due to the COVID-19 pandemic). The 2020 point-in-time data estimated that there more than 63,000 (sheltered and unsheltered) people experiencing homelessness in Los Angeles County.

As of the 2020 survey, there were an estimated 15 unsheltered people experiencing homelessness in the City. Various circumstances that may lead to homelessness include the following:

- Chronically homeless, single adults, including non-institutionalized, mentally disabled individuals, alcohol and drug abusers, older adult individuals with insufficient incomes, and others who voluntarily, or are forced, due to financial circumstances, to live on the streets
- Minors who have run away from home
- Low-income families that are temporarily homeless due to financial circumstances or are in the process of searching for a home (single-parent families, mostly female-headed, are especially prevalent in this group)
- Women (with or without children) who are escaping domestic violence

There are two categories of needs that should be considered in discussing the population experiencing homelessness: (1) transient housing providing shelter, usually on a nightly basis, and (2) short-term housing, usually including a more comprehensive array of social services to enable families to re-integrate themselves into a stable housing environment. **Table 29, Emergency and Supportive Housing Resources**, shows emergency and supportive housing providers in the area, including the name of the shelter, number of beds, description of services, and average number of beds available on any given night. There are no emergency and supportive housing providers in the City.

<b>Table 29. Emergency and Supportive Housing Resources</b>				
Provider	Address	Number of Beds	Services	Average Number of Beds Available on Any Given Night (Estimate)
<b>Beacon Light/Doors of Hope</b>	525 Broad Avenue, Wilmington, CA 90744	15/15	Bed, showers, clothing, and meals	2–3
<b>CES Crisis/Bridge Housing – US Vets Inglewood</b>	733 Hindry Avenue, Inglewood, CA 90301	30	Bed, showers, clothing, and meals	5–7
<b>CES Bridge Housing Program for Women – US Vets Long Beach</b>	2001 River Avenue, Long Beach, CA 90810	30	Bed, showers, clothing, and meals	1–2
<b>CES Bridge Housing Project Achieve – Catholic Charities</b>	1368 Oregon Avenue, Long Beach, CA 90813	20	Bed, showers, clothing, and meals	2–5
<b>Long Winter Shelter – Volunteers of America Los Angeles</b>	5571 Orange Avenue, Long Beach, CA 90805	65	Bed, showers, clothing, and meals	15–25

In 2017, the County passed Measure H, which created significant new resources to address homelessness, including providing to local jurisdictions the opportunity to apply for City Homelessness Plan Implementation Grants. In October 2017, a total of 47 cities were awarded grants, including the City of Manhattan Beach. The City intended to use its \$330,666 grant to coordinate with other jurisdictions, including the County, local stakeholders, and neighboring cities, to address homelessness in the community. The City recognized this would only be accomplished through an active constituency working together, including government, businesses, and the faith community, to tackle the causes of homelessness and implement solutions.

In August 2018, the City Council adopted the City's Five-Year Plan to Address Homelessness in Our Community, and appointed a Homelessness Task Force. The plan, available on its website, contains goals aligned with the City's and County's objectives to address homelessness. The plan also contains an outline of collaborative opportunities, and demonstrates a correlation between the City's efforts and the County's Homeless Initiative Strategies. Consistent with the City's Homelessness Plan's efforts to educate the community on various resources in the South Bay, the City has produced a resource guide for those experiencing homelessness, which is available on the City's website. The guide summarizes a variety of resources offered near Manhattan Beach for those experiencing homelessness and contains a resource card that offers important phone numbers for quick reference.

In November 2018, at the recommendation of the Homelessness Task Force, the City submitted a multi-jurisdictional proposal with the Cities of Redondo Beach and Hermosa Beach (all three collectively referred to as "South Bay Beach Cities") to the County for outreach and education, coordination of regional efforts to address homelessness, and housing navigation services. In April 2019, the Los Angeles County Homeless Initiative announced the award of Measure H grant funding to the South Bay Beach Cities totaling \$330,665 toward homeless coordination, training, and housing navigation services.

In September 2019, the City, along with regional partners the Cities of Redondo Beach and Hermosa Beach, solicited proposals from qualified homeless service providers. Subsequently, the City Council awarded a subcontract to Harbor Interfaith Services to provide three full-time-equivalent positions to assist individuals and families experiencing homelessness in the South Bay Beach Cities. Harbor Interfaith Services was established in 1987 and provides a variety of services to individuals and families, including a 90-day emergency shelter, 18-month transitional housing program, and a Family Resources Center.

In addition to resources designed to aid individuals experiencing homelessness, the City's Housing Element also refers directly to this population in its programs. This includes **Program 10, Countywide Affordable Rental Housing Development** which provides financial assistance for participating cities to develop affordable rental housing and Special Needs housing that may combat homelessness; **Program 28, Specialized Housing Types to Assist Persons with Special Needs**, which eases the restrictions of the construction of emergency shelters and low-barrier navigation centers in certain zones; and **Program 29, Support for Those Experiencing Homelessness**, which aims to provide resources and assistance for those experiencing homelessness in the City. The City continues to provide information regarding services available for those experiencing homelessness on its website via its Homeless Resource Guide.<sup>1</sup>

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<sup>1</sup> <https://www.manhattanbeach.gov/home/showpublisheddocument/40272/636988627556170000>



## 8 Assisted Housing at Risk of Conversion

Section 65583 of the California Government Code was amended in 1991, requiring an analysis of subsidized units and a description of programs to preserve assisted housing developments. One of the foremost housing problems in the State involves the loss of affordability restrictions on a substantial portion of the government-assisted rental housing stock. Much of this housing is “at-risk” of conversion from affordable housing stock reserved predominantly for lower-income households to market-rate housing. Assisted housing developments (or at-risk units) are defined as multifamily, rental housing complexes that receive government assistance under Federal, State, and/or local programs, or any combination of rental assistance, mortgage insurance, interest reductions, and/or direct loan programs, and are eligible to convert to market-rate units due to termination (opt-out) of a rent subsidy contract, mortgage prepayment, or other expiring use restrictions within 10 years of the beginning of the Housing Element planning period.

HUD maintains a list of notices (6 and 12 month) received by HUD pursuant to California’s notice requirements (Government Code Sections 65863.10 and 65863.11). Private owners of assisted multifamily rental housing units who are considering no longer providing rental restrictions and converting restricted units to market-rate units must provide notice to HUD. According to information provided by HUD, no conversion notices have been filed on behalf of any affordable housing providers in the City, and there are 0 low-income units in the City that are at risk of converting to market rate in the next 5 to 10 years.

## 9 Low- and Moderate-Income Housing in the Coastal Zone

Government Code Section 65590 contains requirements for the replacement of low- and moderate-income housing within the coastal zone when such housing is demolished or converted to other uses, subject to certain limitations. In accordance with Government Code Section 65590(b)(1), replacement housing is not normally required for the conversion or demolition of a residential structure that contains fewer than three dwelling units, or, in the event that a proposed conversion or demolition involves more than one residential structure, the conversion or demolition of 10 or fewer dwelling units. The majority of development in the City’s Coastal Zone consists of high-cost market-rate single-family and multifamily housing. Government Code Section 65590(b)(3) states that replacement housing must be provided only where feasible if the local jurisdiction has fewer than 50 acres, in aggregate, of privately owned vacant land that is available for residential use. The City is built out and has only a nominal amount of vacant land, well below the 50-acre threshold. Thus, the City has not had occasion to administer the provisions of Section 65590, nor had occasion to maintain records regarding the income level of past housing occupants. No low- or moderate-income housing has been provided or required pursuant to Section 65590 in the City, whether as replacement units or inclusionary units. This is primarily due to existing land use patterns consisting of small lots that provide for only a few units on a site. Because the City does not have the ability to construct or otherwise subsidize the construction of new housing through redevelopment, it must rely on its existing incentives to promote the development of affordable housing in the Coastal Zone. See a full discussion related to the Coastal Zone in **Section 2.1.4, Coastal Zone, of Appendix C.**

# Appendix C: Constraints and Zoning Analysis

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# 1 Introduction

This appendix of the Housing Element is concerned with the identification of constraints that may affect the development of housing, especially affordable housing. The following constraints are considered in this analysis:

- *Governmental Constraints* refer to regulations, ordinances, and/or controls that may impede the development of new housing or otherwise increase the cost of housing.
- *Market Constraints* refer to economic and market factors that may affect the cost of new housing development.
- *Environmental Constraints* refer to aspects of the environment (e.g., vacant land, utilities, natural hazards) that may affect the cost and/or feasibility of development.

Where a constraint to development is identified, a policy response is identified that indicates the actions the City of Manhattan Beach (City) is pursuing, or intends to pursue, as a means to eliminate or reduce the effects of that particular constraint on housing development, if feasible.

## 2 Governmental Resources and Constraints

Governmental constraints are policies, standards, requirements, and actions imposed by various levels of government upon land and housing ownership and development. These constraints may include building codes, land use controls, growth management measures, development fees, processing and permit procedures, and site improvement costs. Resources available to development exist in the form of development incentives, bonus programs, and infrastructure.

### 2.1 Land Use Controls (General Plan and Zoning)

Land use controls include General Plan policies and zoning designations, and the resulting use restrictions, development standards, and permit processing requirements.

#### 2.1.1 General Plan

Every city in California must have a General Plan that establishes policy guidelines for all development within the city. The General Plan is the foundation of all land use controls in a jurisdiction. The Land Use Element of the General Plan identifies the location, distribution, and density of the land uses within the city. General Plan residential densities are expressed in dwelling units per acre. Under State law, General Plan elements must be internally consistent, and a city’s zoning must be consistent with the General Plan. Thus, the Land Use Element must provide suitable locations and densities to implement the policies of the Housing Element.

The Manhattan Beach General Plan Land Use Element includes three residential land use designations: Low-Density Residential, Medium-Density, and High-Density Residential. As shown in **Table 1, Residential Land Use Categories in the City’s General Plan**, the Low-Density designation’s maximum density permitted ranges from 5.8 to 16.1 dwelling units per acre, the Medium-Density designation’s maximum density permitted ranges from 11.6 to 32 dwelling units per acre, and the High-Density designation’s maximum density permitted ranges from 43.6 to 51 dwelling units per acre.

<b>Table 1. Residential Land Use Categories in the City’s General Plan</b>			
<b>Area District</b>	<b>Low-Density Residential (Maximum Density)</b>	<b>Medium-Density Residential (Maximum Density)</b>	<b>High-Density Residential (Maximum Density)</b>
District I – Hill Section/ Eastside so. of Manhattan Beach Blvd.	5.8 du/acre	11.6 du/acre	43.6 du/acre
District II – Tree Section/ Eastside no. of Manhattan Beach Blvd.	9.5 du/acre	18.9 du/acre	43.6 du/acre
District III – Beach	16.1 du/acre	32.3 du/acre	51.3 du/acre
District IV – El Porto	N/A	N/A	51.0 du/acre

Source: City of Manhattan Beach, General Plan Land Use Element, 2003.  
du/acre = dwelling units per acre; N/A = not applicable

In addition to the residential land use designations, residential or mixed-use development is permitted in several commercial land use designations, as described below.

### *Downtown Commercial*

The Downtown Commercial land use category applies only to the downtown area, an area of 40+ blocks that radiates from the intersection of Manhattan Beach Boulevard and Manhattan Avenue. The downtown area provides locations for a mix of commercial businesses, residential uses, and public uses, with a focus on pedestrian-oriented low-intensity commercial businesses that serve Manhattan Beach residents and visitors. Multifamily residential projects can be developed in accordance with the development standards for the High-Density Residential designation. The height limit in this district ranges from 26 feet to 30 feet, depending on location.

### *Local Commercial*

The Local Commercial land use category provides areas for neighborhood-oriented, small-scale professional offices, retail businesses, and service activities that serve the local community. Permitted uses are generally characterized by those that generate low traffic volumes, have limited parking needs, and generally do not operate during late hours. Residential uses can be developed at densities consistent with the High-Density Residential designation. The height limit is 30 feet.

### *North End Commercial*

Properties designated North End Commercial lie at the north end of the City, along Highland Avenue and Rosecrans Avenue between 33rd and 42nd Streets. Commercial uses are limited to small-scale, low-intensity neighborhood-serving service businesses, retail stores, and offices. Restaurant and entertainment establishments are permitted only where zoning regulations can adequately ensure compatibility with residential uses. The maximum permitted floor area factor is 1.5:1. Residential uses can be developed at densities consistent with the High-Density Residential designation, with a height limit of 30 feet.

### *Mixed-Use Commercial*

The Mixed-Use Commercial land use category accommodates the parking needs of commercial businesses on small lots that front Sepulveda Boulevard and abut residential neighborhoods. In recognition of the need to ensure adequate parking for businesses and to protect residential uses from activities that intrude on their privacy and safety, this category limits commercial activity on commercial lots adjacent to residences, and establishes a lower floor area factor limit of 1.0:1 for commercial uses. Uses permitted are similar to those allowed in the General Commercial category. Residential uses are conditionally permitted, consistent with the Low-Density Residential category and the D-6 Oak Avenue Zoning Overlay.

## 2.1.2 Zoning Code

The Zoning Code is the primary tool for implementing the General Plan. It is designed to protect and promote public health, safety, and welfare. The City regulates the permitted uses, locations, density, and scale of residential development through the Manhattan Beach Municipal Code (MBMC). Chapter 10 of the MBMC, known as the Planning and Zoning Ordinance (Zoning Code), includes residential and nonresidential zoning districts that control the use and development standards of specific sites, and influence the development of housing within the City. Note that the Coastal Zone within the City of

Manhattan Beach has its own set of land use and development regulations, which primarily match those of Area Districts III and IV from the Zoning Code.

### 2.1.2.1 Zoning Districts

Each zone that permits residential uses regulates the residential use permitted, lot size, density, and parking requirements. While regulations such as setbacks, lot size, and lot coverage can contribute to the number of dwelling units that can be developed on a lot, residential densities are primarily limited by established maximum densities. The Zoning Code contains eight zoning districts (zones) that permit residential development: five residential zones (Single-Family Residential District [RS], Medium-Density Residential District [RM], High-Density Residential District [RH], Residential Planned Development District [RPD], and Residential Senior Citizen District [RSC]) and three commercial zones (Local Commercial District [CL], Downtown Commercial District [CD], and North End Commercial District [CNE]).

**Table 2, Residential Uses Permitted by Zoning District**, provides an overview of all residential uses permitted by zoning district.

#### 2.1.2.1.1 Residential Districts

The following provides a brief description of each residential zone's purpose:

##### *Single-Family Residential (RS) District*

To provide opportunities for single-family residential land use in neighborhoods, subject to appropriate standards.

##### *Medium-Density Residential (RM) District*

To provide opportunities for multiple residential uses, including duplexes, town houses, apartments, multi-dwelling structures, or cluster housing with landscaped open space for residents' use.

##### *High-Density Residential (RH) District*

To provide opportunities for an intensive form of residential development, including apartments and town houses with relatively high land coverage, at appropriate

##### *Residential Planned Development (PD) District*

To encourage a diverse living environment and to facilitate adequate, economical and efficient provision of community facilities, streets, utilities, and parks in a landscaped setting.

##### *RSC Residential Senior Citizen (RSC) District*

To facilitate the development of quality senior housing by providing a mechanism to review and approve housing specifically designed for senior-citizen households.

It should be noted that the RPD zone, encompasses approximately 77 acres, but is a completely built-out, gated planned community built in the 1990's. The community consists of approximately 400 town and court homes and 122 estate single-family homes. The RSC zone encompasses approximately 4.7 acres on a total of three parcels in the City, which are built-out with two existing developments for older adults. As further discussed in **Section 2.1.3, Development Standards**, the designation of, or regulations



of, these zones in no way constrain development, as these zones apply to limited areas of the City that are built out.

#### 2.1.2.2 Area Districts

The Zoning Code also helps to preserve the character and quality of residential neighborhoods consistent with the character of the four area districts in the City. The Zoning Code provides for land use and development regulations, including residential standards, broken down by zone and area district. The four area districts are as follows:

- Area District I – South of Manhattan Beach Boulevard and east of Valley/Ardmore
- Area District II – North of Manhattan Beach Boulevard and east of Valley/Ardmore and Bell
- Area District III – Coastal area south of Rosecrans
- Area District IV – Coastal areas north of Rosecrans (El Porto)

#### 2.1.2.3 Design Overlay Districts

In addition to zoning requirements for the base districts, the City has established eight Design Overlay Districts that establish development standards specific to the unique needs of each Overlay District. These additional development standards are objective and do not require any form of design review board/commission/panel or design related findings/requirements. The requirements of these overlay districts instead act as additional objective development standards and are treated as supplemental zoning code standards. The Overlay Districts that apply to residential uses are as follows:

- **D1 – Rosecrans Avenue** applies to Single-Family Residential and Medium-Density Residential Zoning Districts within the overlay where higher fences in the front-yard setback area are needed to reduce traffic noise; in this Overlay District, front yard fences up to 6 feet in height may be constructed as close as 3 feet from the front or street side property line. This overlay covers the northern half of four blocks abutting Rosecrans Avenue. Fencing requirements are needed to protect residents from noise and pollution from a highly trafficked road and do not pose a constraint to development, as the standards are objective, do not increase the time of permit processing, and do not increase the cost of production. Further, none of the sites identified in the Sites Inventory fall within the D1 overlay.
- **D2 – 11<sup>th</sup> Street** applies to High-Density Residential Zoning Districts within the overlay. The overlay covers nine small lots on one block totaling approximately 1.34 acres at 11th Street and Harkness. This overlay requires limitations on building height and density are needed to minimize building bulk and to buffer adjoining residences; high-density residential uses in this area are limited to a maximum height of 26 feet and maximum density of 1 dwelling per 1,800 square feet of lot area. This is a reduction of 4 feet in height and a reduction in density by approximately 20 dwelling units per acre as compared to the base zone. The majority of the parcels within this overlay that covers one block are zoned for commercial uses and the reduction in regulations is needed to protect future residents from existing commercial uses that may be disruptive to residents. Because this is only one block within the City, and the reduction in development standards is minimal and does not increase the time associated with the development process through additional review, this is not considered a constraint

to development. Further, none of the sites identified in the Sites Inventory fall within the D2 overlay.

- **D3 – Gaslamp Neighborhood**, applies only to Single Family Residential Zones within the overlay where additional development standards apply to preserve the character of the neighborhood. Additional standards include:
  - A maximum height of two stories, although the 26 feet permitted by the base zone still applies.
  - Environmental assessment in advancement of the demolition of structures on a site with two or more lots.
  - Second story setback of 10% of the buildable depth of the lot; 10 times the lot width; with the exception of one architectural projection and eaves.
  - For buildings that exceed 22 feet in height, a minimum roof pitch of 3 foot rise in 12 feet of run is required.

The additional development standards do not pose a constraint to development; however, the environmental assessment poses a constraint to development in that it would increase the time and cost associated with redevelopment of the area. While the environmental assessment poses a constraint to development within this area, this does not pose a constraint to meeting the City’s housing needs as this is a built-out single-family neighborhood and no sites within this area have been identified in the Sites Inventory for accommodating the City’s RHNA.

- **D4 – Traffic Noise Impact Area** applies only to Single Family Residential Zones within the overlay which covers two linear blocks abutting Aviation Boulevard and parcels abutting Marine Avenue between Pacific and Meadows Avenue. Development standards permit higher fences of up to 8 feet in height to reduce traffic noise. This overlay does not pose a constraint to development as it does not mandate fences, but instead permits them. Additionally, no sites within the Sites Inventory have been identified in the D4 overlay.
- **D5 – North End Commercial** overlay applies to a three and a half block portion of the Highland Avenue corridor for sites that are zoned CNE. Additional development standards are needed to better accommodate additional residential development in this commercial area. Additional development standards that apply to residential uses include:
  - Lots that are 2,500 square feet or larger must include planter boxes at the pedestrian level along Highland Avenue.
  - The third story shall be setback a minimum of 10 feet from the front-line setback.
  - Residential developments on the west side of Highland Avenue may not have vehicular access from Highland Avenue.

The additional development standards of the D5 overlay do not pose a constraint to development as the standards are objective, do not increase the time associated with development or permitting, and do not increase the cost of development. Additionally, only two sites identified in the Sites Inventory fall within the D5 overlay.

- **D6 – Oak Avenue** applies only to those sites that are zoned for single-family residential in sections along Oak Avenue. These sites abut commercial sites that are along the western side of Sepulveda Boulevard. Additional development standards are in place to create a smooth transition between those single-family residential uses that are adjacent to commercial uses. Additional development standards that apply to residential uses include:
  - A minimum side setback of 5 feet.
  - For buildings that exceed 22 feet in height, a minimum roof pitch of 3 foot rise in 12 feet of run is required.

The additional development standards of the D6 overlay do not pose a constraint to development as the standards are objective, do not increase the time associated with development or permitting, and do not increase the cost of development. Additionally these standards only apply to single family residential uses and no sites identified within the Sites Inventory fall within this overlay.

- **D7 – Longfellow Drive** applies only to those sites zoned for single-family residential uses within the Longfellow Drive neighborhood. This area covers 18 acres of a single-family neighborhood, including residential lots in Tract 14274 located on Longfellow Drive, Ronda Drive, Terraza Place, Duncan Drive, and Kuhn Drive. Additional development standards for this area require a minimum lot area of 17,000 square feet, and further subdivision of any lot within the district is prohibited.

The additional development standards applied by the D7 overlay do not pose a constraint to development as the standards are objective, do not increase the time associated with development or permitting, and do not increase the overall cost of development. Additionally, this is a built-out single-family subdivision and none of the sites identified in the Sites Inventory fall within this overlay.

- **D8 – Sepulveda Corridor** applies to those sites zoned CG on specified sites abutting Sepulveda Boulevard. Sites zoned CG do not permit residential uses, and therefore the development standards applied by this overlay to not apply to residential uses and do not constrain the development of residential uses.

The Design Overlay Districts apply additional standards to specified areas that supplement the applicable base zone as detailed above. While these are referred to as “Design Overlay Districts”, the City does not have a design review process or design guidelines. Rather, the City has additional objective standards that apply to identified areas. The City does not regulate design through any form of a design review board, commission, panel or any design-related findings or requirements.

Senate Bill (SB) 330 (2019) prohibits any non-objective design standard adopted after January 1, 2020. The City is currently in compliance with this requirement. Through implementation of **Program 20, Objective Design Standards**, of the Housing Element, the City will continue to ensure that any new design standards developed and imposed by the City shall be objective.

#### 2.1.2.4 Allowable Uses by Definition

- Accessory Dwelling Unit (ADU): Has the meaning ascribed in Government Code Section 65852.2, as the same may be amended from time to time. Notwithstanding the foregoing, the term “ADU” does not include a guest house (or accessory living quarters), as defined in Municipal Code Section 10.04.030. “Attached ADU” means an ADU that is constructed as a physical expansion (i.e., addition) of a primary dwelling, or the remodeling of a primary dwelling, and shares a common wall with a primary dwelling. “Detached ADU” means an ADU that is constructed as a separate structure from any primary dwelling, and does not share any walls with a primary dwelling.
- Accessory Structure: No definition. See “Guest House.”
- Guest House (or Accessory Living Quarters): Any living area located within a main or an accessory building that does not have direct interior access to the dwelling unit. Such quarters shall have no kitchen facilities and shall not be rented or otherwise used as a separate dwelling unit. Such guest quarters, or accessory living quarters, shall be permitted only on a lot with one single-family residence, except as provided for in MBMC Section 10.52.050(F), Residential Zones-Adjacent Separate Lots with Common Ownership. This guest house, or accessory living quarters, shall be a maximum of 500 square feet in size, limited to one habitable room, and contain a maximum of three plumbing fixtures.
- Community Care Facility: See “Residential Care, Limited.”
- Day Care Facility:  
**Day Care, Small Family Home.** Non-medical care and supervision of six or fewer persons, including those who reside at the home, on a less than 24-hour bases. This classification includes only those services and facilities licensed by the State of California.  
**Day Care, Large Family Home.** Non-medical care and supervision of 7 to 12 children, including those who reside at the home, on a less than 24-hour bases. This classification includes only those services and facilities licensed by the State of California.
- Dwelling, Single-Family: A building containing one dwelling unit.
- Dwelling, Two-Family: See “Dwelling, Multifamily.”
- Dwelling, Multifamily: A building containing two or more dwelling units.
- Family: A single individual or two or more persons living together as a single housekeeping unit in a dwelling unit.
- Home Occupation: No definition. Per MBMC Section 10.52.070, a home occupation in an R district shall require a Home Occupation Permit, obtained by filing a completed application form with the Community Development Director. The Community Development Director shall issue the permit upon determining that the proposed home occupation complies with the requirements of this.
- Junior Accessory Dwelling Unit (JADU): Has the meaning ascribed in Government Code Section 65852.22, as the same may be amended from time to time. Said code defines JADU as “a unit that is no more than 500 square feet in size and contained entirely within a single-family residence. A junior accessory dwelling unit may include separate sanitation facilities, or may share sanitation facilities with the existing structure.”
- Mobile Home: See “Manufactured Home.”

- Manufactured Home: A modular housing unit on a permanent foundation that conforms to the National Manufactured Housing Construction and Standards Act. For purposes of this definition, a mobile home is considered a manufactured home.
- Residential Care, General: Twenty-four-hour non-medical care for seven or more persons, including wards of the juvenile court, in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California.
- Residential Care, Limited: Twenty-four-hour non-medical care for six or fewer persons in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California.
- Residential Condominium: An estate in real property consisting of an undivided interest in common in a portion of a parcel of real property together with a separate interior space in a residential, industrial, or commercial building on the real property, such as an apartment, office, or store. A condominium may include, in addition, a separate interest in other portions of the real property.
- Second Unit: No definition. See “Accessory Dwelling Unit.”

Table 2 provides an overview of all residential uses permitted by zoning district.

**Table 2. Residential Uses Permitted by Zoning District**

Uses	RS	RM	RH	RPD	RSC	CL	CD	CNE
<b>Accessory Dwelling Unit</b>	P	P	P	P	P	P	P	P
<b>Accessory Structure<sup>1</sup></b>	P/U	P/U	P/U	P/U	P/U	—	—	—
<b>Day Care, Small Family Home</b>	P	P	P	P	P	P	U	L <sup>2</sup>
<b>Day Care, Large Family Home</b>	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>
<b>Emergency Shelters<sup>4</sup></b>	—	—	—	—	—	—	—	—
<b>Group Residential</b>	—	—	U	—	U	—	—	—
<b>Home Occupation</b>	Home Occupation Permit <sup>5</sup>					—	—	—
<b>Manufactured Housing (on a permanent foundation)</b>	P	P	P	P	P	—	—	—
<b>Mixed-Use</b>	—	—	—	—	—	U	U	U
<b>Multifamily (5 or fewer units)<sup>6</sup></b>	—	P	P	P	U	U	U	U
<b>Multifamily (6 or more units)<sup>6</sup></b>	—	PDP/SDP	PDP/SDP	PDP/SDP	U	U	U	U
<b>Residential Care, General<sup>7</sup></b>	—	—	U	U	U	—	—	—
<b>Residential Care, Limited</b>	P	P	P	P	P	—	—	—
<b>Single-Family</b>	P	P	P	P	P	U	U	L <sup>8</sup>
<b>Supportive and Transitional Housing</b>	Permitted as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone.							

Source: Chapter 10, Planning and Zoning of the MBMC, 2021.

RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; CL = Local Commercial; CD = Downtown Commercial; CNE = North End Commercial  
P = Permitted; U = Use Permit; L = Limited (see additional use regulations); — = Not Permitted; PDP = Precise Development Plan; SDP = Site Development Permit

- See MBMC Section 10.52.050, Accessory Structures.
- Single-family residential permitted if located (1) on a site which fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a Use Permit is required.
- Application for an administrative large-family day care permit to the Director of Community Development is required and shall be made on forms provided by the City. No hearing on the application for a permit shall be held before the decision is made by the Director unless a hearing is requested by the applicant or other affected person. The Director's decision shall be based on whether or not the proposed use would be compatible with the surrounding neighborhood.
- Emergency shelters are permitted by-right in the Industrial Park (IP) District and the Public and Semipublic (PS) District.
- Per MBMC Section 10.52.070, a home occupation in an R district shall require a Home Occupation Permit, obtained by filing a completed application form with the Community Development Director.
- A Use Permit is required for any condominium development or conversion of three or more units.
- Residential Care, General facilities are also permitted in the General Commercial (CG) District and Public and Semipublic (PS) District on approval of a Use Permit.
- Single-family residential permitted if located (1) on a site which fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a Use Permit is required.

### 2.1.2.5 Single-Family Dwelling Units

As shown in **Table 3, Single-Family Dwelling Units Permitted by Zoning District**, the City permits single-family detached dwelling units in accordance with the Zoning Code in the RS, RM, RH, Residential Planned Development (RPD), and Residential Senior Citizen (RSC), and in the CL, CD, and CNE zones subject to a Use Permit.

Table 3. Single-Family Dwelling Units Permitted by Zoning District								
Use	RS	RM	RH	RPD	RSC	CL	CD	CNE
Single-Family Residential	P	P	P	P	P	U	U	L <sup>1</sup>
<p>Source: Chapter 10, Planning and Zoning of the MBMC, 2021.</p> <p>RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; RPD = Residential Planned Development; RSC = Residential Senior Citizen; CL = Local Commercial; CD = Downtown Commercial; CNE = North End Commercial</p> <p>P = Permitted; U = Use Permit; L = Limited (see additional use regulations)</p> <p>1. Single-family residential permitted if located (1) on a site which fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a Use Permit is required.</p>								

Planning and Zoning Code requirements applicable to single-family development are standard in nature and do not cause undue constraints to single-family development.

### 2.1.2.6 Multifamily Dwelling Units

As shown in **Table 4, Multifamily Dwelling Units Permitted by Zoning District**, the City permits multifamily dwelling units in accordance with the Zoning Code in the Medium-Density Residential (RM), High-Density Residential (RH), Residential Planned Development (RPD), Residential Senior Citizen (RSC), Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones.

Multifamily housing is permitted in most zones allowing residential uses, except for the Single-Family Residential (RS) zone. In the RSC, CL, CD, and CNE zones, a Use Permit is required at any density. In the RM, RH, and RPD zones, multifamily uses are permitted by-right with five or fewer dwelling units. If six or more dwelling units are proposed, a Precise Development Plan (PDP) or Site Development Permit (SDP) are required, depending on whether or not the development qualifies for a density bonus.

Residential developments with six or more units that do not receive a density bonus shall apply for an SDP requiring approval by the Planning Commission. Residential developments that qualify for a density bonus shall apply for an administrative PDP requiring a decision by the Community Development Director. PDPs are intended to encourage the development of affordable housing through a streamlined permitting process.

To mitigate potential constraints to development and further incentivize affordable housing in the City, the City will remove the discretionary requirements for multifamily projects meeting the minimum requirements for a density bonus in the CL, CD, and CNE zones. The City will review and amend the Zoning Code to permit multifamily housing in the CL, CD, and CNE zones without requiring approval of a Use Permit, and all projects that use the State density bonus will be eligible for streamlined approvals through implementation of **Program 18**, of the Housing Element.

Table 4. Multifamily Dwelling Units Permitted by Zoning District								
Multifamily Residential <sup>1</sup>	RS	RM	RH	RPD	RSC	CL	CD	CNE
Five or fewer (reviewed by Director)	—	P	P	P	U	U	U	U
Six or more (Planning Commission)	—	PDP/SDP	PDP/SDP	PDP/SDP	U	U	U	U

Source: Chapter 10, Planning and Zoning of the MBMC, 2021.

RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; RPD = Residential Planned Development; RSC = Residential Senior Citizen; CL = Local Commercial; CD = Downtown Commercial; CNE = North End Commercial

P = Permitted; U = Use Permit; — = Not Permitted; PDP = Precise Development Plan; SDP = Site Development Permit

1. A Use Permit is required for any condominium development or conversion of three or more units.

2.1.2.7 Mobile/Manufactured Homes

Manufactured housing can be constructed for much less than the cost of traditional building. Building various standardized modules in one location results in savings due to economies of scale and greatly reduced waste of building materials. Factory-built housing designed for placement on fixed foundations can be highly attractive and virtually indistinguishable from standard construction. In addition, current factory-built housing is typically built to higher standards for energy conservation.

MBMC Section 10.52.100 dictates manufactured housing is permitted in all R districts (RS, RM, RH) not occupied by another dwelling. The housing is subject to a set of general requirements shown in **Table 5, Manufactured Housing Requirements**, and base residential zone district regulations, as outlined in MBMC Chapter 10.12. These criteria are not unduly burdensome and would not prevent the establishment of manufactured housing on residential lots. However, while manufactured homes are included as a multifamily residential use classification in the Zoning Code, MBMC Section 10.52.100 dictates that manufactured housing must be located in an R district, and that it is not allowed as an additional unit on an already developed lot or as an accessory unit on an already developed lot.

The Zoning Code’s current inconsistencies with State law may pose a constraint to development. As such, as part of implementation of **Program 17, Manufactured Housing**, of the Housing Element, the City will amend the Zoning Code to clarify that manufactured housing is treated as a single-family dwelling and is permitted in all of the same zones and same manner as other single-family structures, including in commercial or mixed-use zones.

Government Code Sections 65852.3 through 65852.5 require that manufactured homes be permitted in single-unit districts subject to the same land use regulations as conventional homes. Government Code Section 65852.7 requires that cities and counties allow mobile home parks (including condominium and cooperative parks) on all land planned and zoned for residential land use. The MBMC does not currently define mobile home parks; therefore, it also does not identify zoning districts in which this use is permitted. **Program 17** of the Housing Element will amend the MBMC to permit mobile home parks on all land zoned or planned for residential land uses as required by State law.



<b>Table 5. Manufactured Housing Requirements</b>	
<b>General Requirements</b>	Manufactured homes may be used for residential purposes if such manufactured home has been granted a Certificate of Compatibility and is located in an R district. Manufactured homes also may be used for temporary uses, subject to the requirements of a temporary Use Permit issued under Chapter 10.84.
<b>Requirements for Certificates of Compatibility</b>	Manufactured homes may be located in any R district where a single-family detached dwelling is permitted, subject to the same restrictions on density and to the same property development regulations, provided that such manufactured home receives a Certificate of Compatibility. The Community Development Director shall issue such certificate if the manufactured home meets the design and locational criteria of this subsection.  The certificate shall be valid for two (2) years and may be renewed for subsequent periods of 2 years if the location and design criteria of this section are met. More specifically, the location and design of manufactured homes shall comply with the following criteria in order to protect neighborhood integrity, provide for harmonious relationship between manufactured homes and surrounding uses, and minimize problems that could occur as a result of locating manufactured homes on residential lots.
<b>Location Criteria</b>	Manufactured homes shall not be allowed: <ul style="list-style-type: none"> <li>a. On substandard lots that do not meet the dimensional standards of Chapter 10.12;</li> <li>b. As an additional unit on an already developed lot;</li> <li>c. As an accessory building or use on an already developed lot; or</li> <li>d. On lots with an average slope of more than ten percent (10%), or on any portion of a lot where the slope exceeds fifteen percent (15%).</li> </ul>
<b>Design Criteria</b>	Manufactured homes shall be compatible in design and appearance with residential structures in the vicinity and shall meet the following standards: <ul style="list-style-type: none"> <li>a. Each manufactured house must be at least sixteen feet (16') wide;</li> <li>b. It must be built on a permanent foundation approved by the Community Development Director;</li> <li>c. It must have been constructed after June 1, 1979, and must be certified under the National Manufactured Home Construction and Safety Act of 1974;</li> <li>d. The unit's skirting must extend to the finished grade;</li> <li>e. Exterior siding must be compatible with adjacent residential structures, and shiny or metallic finishes are prohibited;</li> <li>f. The roof must have a pitch of not fewer than three inches (3") vertical rise per twelve inches (12") horizontal distance;</li> <li>g. The roof must be of concrete or asphalt tile, shakes or shingles complying with the most recent editions of the Uniform Building Code fire rating approved in the City of Manhattan Beach;</li> <li>h. The roof must have eaves or overhangs of not less than one foot (1');</li> <li>i. The floor must be no higher than twenty inches (20") above the exterior finished grade; and</li> <li>j. Required enclosed parking shall be compatible with the manufactured home design and with other buildings in the area.</li> </ul>
Source: City of Manhattan Beach Municipal Code (10.52.100 - Manufactured Homes).	

### 2.1.2.8 Accessory Dwelling Units

Section 65852.2 of the California Government Code requires local governments to permit ADUs subject to certain limitations in single-family and multifamily residential zones. In January 2021, the City adopted the City's current ADU Ordinance to comply with new State regulations. The corresponding amendments to the City's Local Coastal Program (LCP) are currently under review and under consideration by the California Coastal Commission.

Pursuant to MBMC Section 10.74.0.0, a maximum of two total ADUs shall be allowed on a lot with a proposed or existing single-family dwelling within all area districts; however, only one ADU shall be allowed on a property that also has a JADU. Only one detached ADU is allowed on a property. Additionally, in all area districts, one ADU shall be allowed on a lot with a newly constructed multifamily development. More than one ADU, up to 25 percent of the number of pre-existing multifamily dwelling units on the property, shall be allowed where the applicant proposes to demolish an existing multifamily development to build a new multifamily development. For any property that is considered a nonconforming use (i.e., because it does not meet the current site area per dwelling unit requirement), the total resulting number of units on the property, including ADUs, shall not be greater than the number of pre-existing units on the property.

Applicable development standards are in compliance with current State regulations and include, but are not limited to, the following:

- Studio and one bedroom ADUs shall not exceed 850 square feet of gross floor area. ADUs with two or more bedrooms shall not exceed 1,200 square feet of gross floor area.
- A Detached ADU shall not exceed 16 feet in height, or if above a detached garage or below a detached garage that does not qualify as a basement, shall not exceed a total height of 26 feet.
- No setback shall be required for an existing structure converted to an ADU. For all other ADUs, the required setback from side and rear lot lines shall be 4 feet.
- A Detached ADU shall have a minimum 5-foot building separation from other buildings on the lot (note: the standard requirements of 10 feet of separation between structures was reduced to 5 feet for ADUs to incentivize development).
- ADUs do not require parking if the ADU is located within 0.5 miles walking distance of public transit.

The City incentivizes ADUs by permitting ADU development with new residential construction, including multifamily residential projects, which is above and beyond what the State requires of local jurisdictions, as follows:

- Consistent with State law, the City permits one ADU and one JADU. Alternatively, to offer more flexibility, the City permits two ADUs on a lot with a proposed or existing single-family dwelling.<sup>1</sup>
- The City permits ADUs for existing multifamily dwelling units, consistent with State law. In addition, the City permits one ADU on a lot with a newly constructed multifamily development.<sup>2</sup>

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<sup>1</sup> ADUs on Lots with a Single-Family Residence. A maximum of two total ADUs shall be allowed on a lot with a proposed or existing single-family dwelling within all area districts; however, only one ADU shall be allowed on a property that also has a JADU. Only one detached ADU is allowed on a property (MBMC Section 10.74.040).

<sup>2</sup> ADUs on Lots with New MultiFamily Developments. In all area districts, one ADU shall be allowed on a lot with a newly constructed multifamily development (MBMC Section 10.74.040).

### 2.1.3 Development Standards

Each zone that permits residential uses regulates the residential use permitted, lot size, density, and parking requirements. While regulations such as setbacks, lot size, and lot coverage can contribute to the number of dwelling units that can be developed on a lot, residential densities are primarily limited by established maximum densities or minimum lot area per dwelling unit.

**Tables 6a and 6b** provide summaries of residential zone's RS, RM, and RH development standards by area district, including minimum lot area per dwelling unit, and building height and setback regulations. **Table 6c** provides a description of commercial zones where residential uses are permitted in the City and their respective development standards.

Development standards for the Residential Planned Development (RPD) District and Residential Senior Citizen (RSC) District are provided following Table 6c.

The development standards detailed below do not prevent housing development from achieving the maximum densities allowed in accordance with the MBMC development standards and are not considered a barrier to development. In addition, the City offers flexibility through modifications to development standards, including increased maximum lot coverage, increased building height, and a density bonus above and beyond what is permitted under State law for projects that qualify for a State density bonus, as well as a lot consolidation incentive bonus.

Current residential projects in the pipeline that include lower-income units and are expected to be completed during the planning, will achieve densities at, or above and beyond, the maximums permitted in the underlying zone utilizing density bonus and/or lot consolidation bonus incentives offered by the City. These developments are expected to be completed in the planning period and serve as examples of the ability for developments in the City to achieve the maximum densities under the City's existing development regulations. See additional discussion in Section 2.6, Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing.

#### *Citywide Election Requirement*

Under MBMC Section 10.12.030 (Property Development Regulations: RS, RM, and RH Districts), certain development standards cannot be amended for the RS, RM, and RH Districts unless the amendment is first submitted to a Citywide election and approved by a majority of the voters. This provision, originally instated as a result of initiative and vote of the people, applies to amending the following specific development regulations for the RS, RM, and RH residential zones standards listed in Section 10.12.030 of the MBMC: to increase the standards for the maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit. The city-wide election requirements do not restrict multifamily housing developments or prevent developments from achieving the maximum densities allowed in accordance with the MBMC development standards.

The voter initiative required for amending those specific development regulations in the RS, RM, and RH zones does not preclude the City from implementing incentives, concessions, and waivers under State Density Bonus law. As stated in Section 10.94.010, General Affordable Housing Provisions, of the MBMC and in Government Code Section 65915, the granting of a density bonus, concession or incentive, shall not require, or be interpreted, in and of itself, to require a general plan amendment, local coastal plan

amendment, zoning change, or other discretionary approval. As such, the city-wide election requirements under MBMC Section 10.12.030 are not a constraint to the development of affordable housing and do not restrict the ability of the City to provide flexibility for development under State Density Bonus Law.

<b>Table 6a. Residential Development Standards by Zone for Area District I and II</b>						
<b>Development Regulation</b>	<b>Area District I</b>			<b>Area District II</b>		
	<b>RS</b>	<b>RM</b>	<b>RH</b>	<b>RS</b>	<b>RM</b>	<b>RH</b>
Minimum Lot Area	7,500 sq ft	7,500 sq ft	7,500 sq ft	4,600 sq ft	4,600 sq ft	4,600 sq ft
Maximum Lot Area	15,000 sq ft	15,000 sq ft	15,000 sq ft	10,800 sq ft	10,800 sq ft	10,800 sq ft
Minimum Width	50 ft	50 ft	50 ft	40 ft	40 ft	40 ft
Front Setback	20 ft	20 ft	20 ft	20 ft	20 ft	20 ft
Side Setback	10% 3 ft min	10% 3 ft min; 10 ft max	10% 3 ft min; 10 ft max	10% 3 ft min	10% 3 ft min; 10 ft max	10% 3 ft min; 10 ft max
Corner Side Setback	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max
Rear Setback	12 ft min.	12 ft min.	12 ft min.	12 ft min.	12 ft min.	12 ft min.
Maximum Height of Structures	26 ft	26 ft	30 ft	26 ft	26 ft	30 ft
Minimum Lot Area per Dwelling Unit	7,500 sq ft	3,750 sq ft	1,000 sq ft	4,600 sq ft	2,300 sq ft	1,000 sq ft
Open Space per Dwelling Unit	For multifamily dwelling units in all districts, the minimum usable open space* (private and shared) requirement is 15% of the buildable floor area per unit, but not less 220 square feet.					
<p>Source: Chapter 10, Planning and Zoning of the MBMC, 2021.            RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; sq ft = square feet; ft = feet; min = minimum; max = maximum            * Outdoor or unenclosed area on the ground, or on a balcony, deck, porch, or terrace designed and accessible for outdoor living, recreation, pedestrian access or landscaping, that is not more than 75% covered by buildable floor area, and has a minimum dimension of 5 feet in any direction, and a minimum area of 48 square feet.</p>						

<b>Table 6b. Residential Development Standards by Zone for Area District III and IV</b>						
<b>Development Regulation</b>	<b>Area District III</b>			<b>Area District IV</b>		
	<b>RS</b>	<b>RM</b>	<b>RH</b>	<b>RS</b>	<b>RM</b>	<b>RH</b>
Min Lot Area	2,700 sq ft	2,700 sq ft	2,700 sq ft	N/A	N/A	2,700 sq ft
Max Lot Area	7,000 sq ft	7,000 sq ft	7,000 sq ft	—	—	7,000 sq ft
Min Width	30 ft	30 ft	30 ft	—	—	30 ft
Front Setback	5 ft	5 ft	5 ft	—	—	5 ft
Side Setback	10% 3ft min.	10% 3 ft min; 10 ft max	10% 3 ft min; 10 ft max	—	—	10% 3 ft min; 10 ft max
Corner Side Setback	1 ft	1 ft	1 ft	—	—	1 ft
Rear Setback	5 ft min, 10 ft max	5 ft	5 ft	—	—	5 ft
Maximum Height of Structures	30 ft	30 ft	30 ft	—	—	30 ft
Minimum Lot Area per Dwelling Unit	1,700 sq ft	1,350 sq ft	850 sq ft	—	—	850 sq ft
Open Space per Dwelling Unit	For single-family dwellings in Area District III and IV and multifamily dwelling units in all districts, the minimum usable open space* (private and shared) is 15% of the buildable floor area per unit, but not less than 220 square feet.					
Source: Chapter 10, Planning and Zoning of the MBMC, 2021.						
RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; sq ft = square feet; ft = feet; min = minimum; max = maximum; N/A = not applicable						
* See Table 6a, Residential Development Standards by Zone for Area District I and II.						

**Table 6c. Residential Development Standards in Commercial Zones (CL, CD, CNE)**

Zoning District	Residential as Sole Use	Mixed Use
CL	<p>Dwelling units as the sole use on a site shall be subject to the standards for residential development in the RH district and the area district in which the site is located. For CL, an exception for height requirements dictates the commercial standard for building height shall apply when dwelling units replace commercial use.</p>	<p>In a mixed use development, the residential standards for the RH district and area district in which the site is located shall apply to a building or portion of a building intended for residential use, and commercial standards shall apply to a building or portion of building intended for commercial use. For CL, an exception dictates the commercial standard for maximum FAR [floor area ratio] shall apply to the entire project.</p>
CD	<p>Dwelling units as the sole use on a site shall be subject to the standards for residential development in the RH district and the area district in which the site is located.</p>	<p>In a mixed use development, the residential standards for the RH district and area district in which the site is located shall apply to a building or portion of a building intended for residential use, and commercial standards shall apply to a building or portion of building intended for commercial use. For CD, an exception regarding building height requires the commercial standard shall apply to all portion(s) of the project except when an existing residential use that is legally established as of February 22, 1996 and occupies a solely residential building, is altered or replaced with a solely residential building, in which case the RH district standard shall apply. Additionally, an exception dictates the commercial standard for maximum FAR shall apply to the entire project.</p>
CNE	<p>Dwelling units as the sole use on a site shall be subject to the standards for residential development in the RH district and the area district in which the site is located. For CNE, D-5 overlay, an exception dictates if an RH district standard conflicts with an overlay standard (Section 10.44.040), the overlay standard shall apply.</p>	<p>In a mixed use development, the residential standards for the RH district and area district in which the site is located shall apply to a building or portion of a building intended for residential use, and commercial standards shall apply to a building or portion of building intended for commercial use. For CNE, D-5 overlay, an exception dictates if an RH district standard conflicts with an overlay standard (Section 10.44.040), the overlay standard shall apply. Additionally, an exception dictates the commercial standard for maximum FAR shall apply to the entire project.</p>

Source: Chapter 10, Planning and Zoning of the MBMC, 2021.

## ***Residential Planned Development (RPD) District Development Standards***

The RPD is intended to facilitate adequate, economical and efficient provision of community facilities, streets, utilities, and parks in a landscaped setting. It should be noted that the RPD zone, encompasses approximately 77 acres, but is a completely built-out, gated planned community built in the 1990's. The community consists of approximately 400 town and court homes and 122 estate single-family homes.

The following development regulations apply in the RPD zone:

A. **General Conditions and Limitations.** Each comprehensive residential planned development (RPD) shall be subject to use permit approval, and the following conditions and limitations (see also Section 10.12.020 for additional land use regulations).

1. The maximum permitted density shall be consistent with the General Plan.
2. Greenbelts shall be provided offering easy access between dwelling units, parks, and commercial areas.
3. Each building site shall abut and provide access to a public or private street or alley.
4. The RPD shall be designed around an architectural theme or themes providing architectural variations and containing landscaped berms and/or decorative walls and fences.  
Homeowners associations, to be established at the time of initial development, shall have the authority to determine theme consistency for subsequent ministerial projects.

B. **Development Standards.** This subsection establishes minimum development standards that are intended to apply to all physical improvements on the site and ensure construction of a high-quality residential environment in a RPD district. Minor modifications to these standards, with the exception of development density, may be approved by the Planning Commission as part of an RPD permit and shall be incorporated into the Planning Commission resolution approving the RPD permit. Minor modifications to standards may be approved by the Community Development Director for subsequent isolated projects (including reconstruction) that are compatible with the existing RPD development (existing prior to January 1995) if such modifications are requested in writing by the applicant and responsible homeowners' association.

1. **Minimum Building Site Area.** Forty thousand (40,000) square feet.
2. **Minimum Lot Area.**
  - a. **Detached Single-Family Dwellings.** Five thousand (5,000) net square feet per unit, provided the average lot area shall not be less than five thousand five hundred (5,500) square feet for the total net site area.
  - b. **Attached or Cluster Multiple-Family Dwellings.** A minimum lot area of two thousand (2,000) net square feet per unit shall be required, provided the average lot area per dwelling unit shall not be less than two thousand five hundred (2,500) square feet for the total net site area.
  - c. **Determining Net Site Area.** Net site area excludes common areas that are required for parkland or right of way dedication requirements and areas that exceed a fifteen percent (15%) slope.
3. **Maximum Building Height.** Twenty-six feet (26'). A height limitation of thirty feet (30') for multifamily developments may be approved if the additional height is required to construct

a tuck-under garage which provides direct access to a dwelling unit. Height shall be measured in accord with Section 10.60.050.

4. **Maximum Building Site (Lot) Coverage.**
  - a. **Single-Family Dwellings.** Fifty percent (50%), exclusive of roof overhangs, trellis areas, covered porches, and allowable structures in the side and rear yard setback areas.
  - b. **Multiple-Family Dwellings.** Sixty percent (60%), excluding roof overhangs, trellis areas, and covered porches.
5. **Minimum Building Setbacks for Single-Family Dwellings and Accessory Structures.**
  - a. **From Street Property Lines.**

Street Designation	Minimum Setback (Feet)
Arterial	50
Collector (primary loop)	30
Collector (secondary loops)	25
Neighborhood or local	20
Private driveways or alleys	20

- b. **From Interior Side-Lot Line.** Five feet (5').
  1. **Exceptions for Zero-Side Yards.** A zero (0) side-yard development may be approved if the opposite yard or the combined side-yard setbacks of the two (2) adjoining structures is a minimum of ten feet (10').
- c. **From Rear Lot Line:** twenty feet (20').
  1. **Exception.** If the area to be developed contains more than thirty (30) acres, a maximum of twenty-five percent (25%) of the total number of lots may have reduced rear-yard setbacks, provided that the average setback shall not be less than fifteen feet (15') on any lot, but in no case shall the dimension between the closest point of the structure and the property line be less than ten feet (10'). In addition, up to three percent (3%) of the total number of lots can maintain a minimum eight-foot (8') setback.
- d. **Structures Allowed in the Setback Area.** Limited structural improvements are permitted to be located in side- and rear-yard setback areas to provide the occupant with usable space for open space and recreational purposes. These uses may include pools and spas, pool and spa equipment, barbecues, garden potting benches and related storage, fountains, bird baths, patio covers, second-story open and unenclosed balconies, gazebos, greenhouses, planter beds, landscaping, irrigation systems, and other similar improvements which, in the determination of the Director of Community Development, meet the intent of this section. The installation of such improvements is subject to the following conditions.
  1. No improvement may be constructed in violation of the Uniform Building Codes or other applicable codes and ordinances.
  2. The rear-yard setback area must be provided with continuous access, defined as an area open and unobstructed from the ground to the sky, a minimum of three feet (3') wide, from the front to the rear of the property.
  3. No improvement other than area-separation walls or fences which cannot exceed the height limits prescribed by this Code, may be constructed in excess of fifteen feet (15') in height.
  4. Any improvement(s) that has a roof element shall not exceed a maximum lot coverage of 40 percent of the required rear-yard setback.



- e. **Setbacks from Public Greenbelts, Lakes, or Parks.** 20 feet plus 10 feet for two-level dwellings.
- f. **Setbacks from District Boundaries.** 50 feet. The Planning Commission may reduce this requirement upon finding that an adequate buffer is provided.
- g. **Building Separation.** The distance between primary buildings and accessory buildings on the same lot shall not be less than 10 feet.

6. **Minimum Building Setbacks for Attached or Cluster Multifamily Dwellings:**

a. **From Street Property Lines:**

Street Designation	Minimum Setback (Feet)
Arterial	50
Collector (primary loop)	30
Collector (secondary loops)	25
Neighborhood or local	20
Private driveways or alleys	20

b. **Setbacks between Structures on the Same Site:**

Individual Primary Buildings: 10 feet.  
 Building Clusters: 40 feet plus 5 feet for each story above one.

1. **Exception:** Where the open space is more than 10 feet below the elevation of the residential structures, the first-story setback can be no less than 10 feet.

- c. **Setbacks between Clusters and Public Greenbelts, Lakes, and Parks:** 20 feet plus 5 feet for each story above one.
- d. **Setbacks from District Boundaries:** 50 feet. The Planning Commission may reduce this requirement upon finding that an adequate buffer is provided.
- e. If the area to be developed contains more than 40 acres, the setback requirements can be modified by an RPD Permit if the Planning Commission finds that the project is in substantial compliance with the intent and purpose of the RPD District.

7. **Private Open Space.** The minimum usable open space shall be three hundred (300) square feet, shall be on the ground, and shall be intended to provide for private recreational outdoor use.

8. **Public Open Space.**

- a. All public common areas, parks, recreation facilities and medians shall be fully developed and landscaped in accord with plans approved by the Public Works Department.
- b. The homeowners' association(s) shall be responsible for the maintenance of all private common areas including, but not limited to, parkways and trails, recreation facilities, and landscaped medians.

9. **Parking Requirements.**

- a. **Single-Family Dwellings.** Two (2) enclosed off-street parking spaces directly serving each unit, plus two (2) additional off-street parking spaces, either enclosed or unenclosed.
- b. **Multiple-Family Dwellings.** Two (2) enclosed off-street parking spaces directly serving each unit, plus one (1) additional off-street parking space for use by guests. Guest parking may be located adjacent to the dwelling unit served or may be clustered if the Planning Commission finds that such clusters will be located in convenient proximity to a number of dwelling units.

- c. **Recreational Vehicles:** A deed restriction shall be imposed on all residential properties prohibiting the parking of recreational vehicles, trailers, or boats on private driveways or streets within the development.

The designation of or regulations of the RPD zone in no way constrains development, as this zone applies to limited areas of the City that are entirely built out. Any amendments to the regulations of the RPD zone would not serve any planned or future development, as it would not result in a removal of any potential constraints. Further, no sites identified in the Sites Inventory are on sites zoned RPD.

### ***Residential Senior Citizen (RSC) District Development Standards***

The RSC was codified with the intent of facilitating the development of quality senior housing on a specific site through specific standards that codified the requirements of senior-citizen housing. Per the MBMC, a senior citizen household shall be defined as a household in which one member of the household, or dwelling unit, is sixty-two (62) years of age or older. It should be noted that this zone includes three parcels and encompasses a total of approximately 4.7 acres in the City. The parcels are built-out with existing housing for older adults including the Ross Manhattan Terrace apartments for older adults built in 1991, and the Manhattan Senior Villas, built in 1997, an affordable, independent living housing apartment complex for older adults and older adults with disabilities. The implementation of the RSC zone has been fully realized and does not apply to any other sites in the City, and therefore does not apply to any planned or future development.

Additionally, the RSC zone does not preclude or constrain the development of additional housing for older adults in the City since senior housing (independent living) is qualified as a multifamily residential use and can be constructed in all zones that allow for multifamily residential development via the same processes as described in Section 2.1.2.6, Multifamily Dwelling Units. Accordingly, senior housing is allowed in the following zoning districts: RM, RH, RSC, RPD, CL, CD, and CNE, as further discussed in **Section 2.2.1, Senior Housing/ Housing for Older Adults.**

The following development regulations apply to the RSC zone:

- A. **Minimum Building Site Area.** Forty thousand (40,000) square feet.
- B. **Minimum Lot Area per Dwelling Unit.** Nine hundred (900) square feet.
- C. **Minimum Floor Area per Dwelling Unit.** Five hundred twenty-five (525) square feet.
- D. **Maximum Building Height.** Thirty feet (30'). The Planning Commission shall review the compatibility of the height of the proposed development with the surrounding neighborhood in accord with the following criteria:
  - 1. Building height shall be compatible with existing adjacent structures. Tuck-under parking and/or a sloped roof design with a minimum ratio of 4:12 is suggested for structures exceeding twenty-six feet (26') in height.
  - 2. All rooftop or elevated mechanical equipment or vents shall be screened from view.
- E. **Maximum Floor Area Ratio.** 1.5:1.
- F. **Minimum Yards and Building Setbacks.** Minimum yards and setbacks shall not be less than those required in the RH district for the area district in which the development is proposed.
- G. **Minimum Distance between Buildings.** Ten feet (10').

- H. **Building Design.** To encourage greater architectural creativity in facade design, two (2) of the following architectural elements are required as part of each building facade: sloped roofs; bay windows; awnings; roof eaves; cornices; sills; buttresses; balconies; or patios.
- I. **Open Space.**
1. **Overall Requirement.** Total three hundred fifty (350) square feet of usable open space shall be provided for each unit.
  2. **Private Open Space.** A minimum of fifty (50) square feet with direct access from each unit shall be provided. The minimum horizontal dimension of balconies shall be five feet (5’).
  3. **Common Open Space.** The minimum horizontal dimension of patios, decks, courtyard areas, and other common space shall be ten feet (10’).
- J. **Community Facilities.** An amount equal to fifteen (15) square feet per unit shall be developed as community space providing handicapped bathrooms and kitchen facilities to be used by project residents and their guests only.
- K. **Landscaping.**
1. All unpaved areas shall be planted with an effective combination of trees, ground cover, and shrubbery.
  2. Landscaping may be required in excess of the minimum standards specified for a proposed development, provided that the additional landscaping is necessary to accomplish the following:
    - a. Screen adjacent uses from parking areas, storage, or structures that could cause a negative impact on adjacent uses based on aesthetics, noise, or odors; or
    - b. Provide landscaping that is compatible with neighboring uses.
  3. The landscape plan shall be compatible with the shape and topography of the site and the architectural characteristics of the structures on the site.
  4. The plant materials selected shall be suitable for the given soil and climate conditions.
  5. Landscaping shall be used to relieve solid, unbroken elevations and to soften continuous wall expanses.
  6. Landscaping shall be maintained in an orderly and healthy condition. This maintenance shall include proper pruning, mowing of lawns, weeding, removal of litter, fertilizing, replacement of plants when necessary, and regular watering.
  7. Landscaping shall screen storage areas, trash enclosures, parking areas, public utilities, and other similar land uses or elements that do not contribute to the enhancement of the surrounding areas.
  8. All landscaping shall be separated from parking and vehicular circulation areas by a raised, continuous six-inch (6”) curb. Other materials that accomplish the same purpose may be approved by the Director of Community Development.
  9. For additional site landscaping requirements, see Section 10.60.070, Landscaping, Irrigation and Hydroseeding. Conformance with standards specified in Section 10.60.070 may result in landscaping that exceeds the minimum requirements of this section.
- L. **Parking Requirements:**
1. **Minimum Spaces:**
    - a. 1.2 per unit, including one enclosed; and
    - b. One (1) space for every nonresidential employee.
  2. **Loading Area:** A loading area shall be provided on site. The area may not at any time obstruct vehicular or pedestrian circulation, or block access to parking. The loading area shall be:
    - a. An off-street loading space of not less than ten feet (10’) × twenty feet (20’); or

- b. A loading zone of not less than twenty-five (25) lineal feet.
- 3. **Aesthetics:**
  - a. No more than forty percent (40%) of the street frontage shall be utilized for vehicular access.
  - b. To avoid long, continuous blank walls at-grade, parking garages shall include openings such as windows and doors for fifty percent (50%) of the vertical surface.
  - c. Exterior lighting shall be designed in such a manner as to avoid glare on adjacent properties.
- 4. **Parking Access and Driveways:**
  - a. In pedestrian-intensive areas, such as but not limited to the Downtown, the North End (El Porto), and the local-servicing commercial properties along Highland and Rosecrans avenues, driveway encroachments are discouraged along the primary commercial streets (Manhattan Avenue, Manhattan Beach Boulevard, Highland Avenue, Morningside Drive, and Rosecrans Avenue). Driveways shall be limited, where feasible, to side streets and/or alleys.
  - b. Each driveway serving the garages or parking spaces shall be at least ten feet (10') wide for one (1) way or twenty-five feet (25') for two (2) way.

**M. Unit Design Standards.**

- 1. To assist in reaching, drawers and shelves shall be on gliders or rotating.
- 2. For easy grip, lever handles shall be used instead of knobs.
- 3. Tub/showers shall have non-slip surfaces with grab bars.
- 4. For security/convenience:
  - a. A peep-hole shall be included in the front door;
  - b. Dead-bolt exterior doors shall be installed;
  - c. Whenever possible, unit entrances shall have direct access to parking facilities; and
  - d. Long interior halls shall be avoided.
- 5. A minimum of two hundred (200) cubic feet of storage space per unit shall be provided.
- 6. All projects two (2) stories in height or greater shall have elevators.
- 7. Unit orientation and window location:
  - a. The living room or living space with the greatest square footage, other than a bedroom, shall have an operable window facing the front or rear yard.
  - b. For easy visibility from a sitting position within the unit, at least one (1) window in the living room shall have a sill no greater than thirty inches (30") from the floor.

The designation of or regulations of the RSC zone in no way constrains development, as this zone applies to limited areas of the City that are entirely built out. Any amendments to the regulations of the RSC zone would not serve any planned or future development, as it would not result in a removal of any potential constraints. Further, no sites identified in the Sites Inventory are on sites zoned RSC.

**2.1.3.1 Parking Requirements**

The provision of parking is needed to satisfy the requirements of the Zoning Code. In addition, the California Coastal Commission has repeatedly expressed the need to preserve public parking for visitor serving uses, which can sometimes be affected by new development. A reduction in parking to fewer than two parking spaces per dwelling unit could potentially result in impacts on existing public parking. City parking requirements are shown in **Table 7, Parking Requirements for Residential Land Uses**. As

can be seen from this table, parking requirements are most stringent for larger units and least stringent for smaller, more affordable units, including a reduction from two spaces to one space for units with less than 550 square feet of floor space in multifamily residential buildings with less than four units and a minimal requirement of 0.25 guest spaces per unit in multifamily residential buildings for buildings with 4 or more units.

To mitigate potential constraints to the development of housing affordable to lower- or moderate-income households, lower-income students, senior citizens housing development, as defined in Sections 51.3 and 51.12 of the Civil Code, or those with special needs, such as transitional foster youth, veterans with a disability, or people experiencing homelessness, the City provides reduced parking requirements for housing developments that qualify for a density bonus pursuant to State density bonus law. Consistent with AB 2345 (2020), the City does not require a parking ratio that exceeds the following for a development that receives a density bonus:

- Studio / 1-bedroom Units – 1 space
- 2 Bedroom / 3 Bedroom Units – 1.5 spaces
- 4 or More Bedroom Units – 2.5 spaces

While the City implements these parking ratios in accordance with current State density bonus law, as part of **Program 11** of the Housing Element, the City commits to amending Section 10.94.040 - Affordable Housing Concessions and Incentives, of the MBMC to ensure the reduced parking ratios in the Zoning Code are consistent with AB 2345 (2020), so that the reduced parking ratios available are clear to any applicant who qualifies for a density bonus.

In addition to the reduced parking ratios currently offered, the City will conduct a parking study as part of **Program 22**, Parking Reductions, of the Housing Element to identify opportunities for additional parking reductions for residential multifamily housing outside of the Coastal Zone, such as reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities. S

See additional discussion in Section 2.6, Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing.

<b>Table 7. Parking Requirements for Residential Land Uses</b>	
<b>Unit Type</b>	<b>Required Parking</b>
Single-Family Residential: Dwelling with Buildable Floor Area (BFA), plus any exempted basement floor area, totaling less than 3,600 square feet	2 enclosed spaces per unit.
Single-Family Residential: Dwelling with Buildable Floor Area (BFA), plus any exempted basement floor area, totaling	3 enclosed spaces per unit.

Table 7. Parking Requirements for Residential Land Uses	
Unit Type	Required Parking
3,600 square feet or more	
Multifamily Residential (Condominiums)	2 enclosed spaces per condominium unit. In buildings with fewer than 4 units, only 1 enclosed space is required for units with less than 550 square feet of floor area. Required Guest Parking: 1 guest space is required per unit; these may be in tandem configuration provided that, except for lots on The Strand, none other than resident spaces of the same unit are blocked and that such a configuration would not result in undue traffic hazard. Guest parking may be "Compact."
Multifamily Residential (Apartments)	2 spaces are required per unit, including 1 enclosed per unit. In Area District IV, both spaces must be enclosed. In building with fewer than 4 units, only 1 enclosed space is required for units with less than 550 square feet of floor area. Required Guest Parking: 0.25 space per unit for buildings with 4 or more units. Guest parking may be "Compact."
Residential Care, Limited	1 space per 3 beds.
Senior Citizen	0.5 space per unit, plus 1 accessible and designated guest space/ 5 units. 1 space per non-resident employee and 1 loading area.
Source: City of Manhattan Beach Municipal Code (10.64.030)	

2.1.4 Coastal Zone

Section 65590 of the California State Government Code requires the inclusion of low- or moderate-income housing in new residential development in the Coastal Zone where feasible. Most of the housing in the Coastal Zone consists of high-cost market-rate units due to coastal desirability. Development in the Coastal Zone is constrained by high land values. The limited availability and high cost of land make it infeasible to provide low- or moderate-income housing on single-family or small multifamily lots within the City’s Coastal Zone without very large subsidies. Those areas of the City that are subject to the Coastal Zone run along the coast where the northern and southern boundaries of the Coastal Zone are the same as the City’s boundaries; the western border of the Coastal Zone is the Pacific Ocean; and the eastern portions run along Vista Drive Between 35<sup>th</sup> Street and 24<sup>th</sup> Street, along Grandview Avenue between 24<sup>th</sup> Street and 21<sup>st</sup> street, along Valley Drive between 20<sup>th</sup> Street and 10<sup>th</sup> Street, and along Bayview Drive from 10<sup>th</sup> street to the City’s southern boundary. The built environment of the Coastal Zone in Manhattan Beach is similar to many beach communities across California, with a mixture of lower density housing types built with minimal setbacks, a grid street network that creates view corridors that lead to the coast, and strong pedestrian connectivity provided by adequate sidewalks, painted pedestrian crosswalks, and pedestrian cut-throughs. There are no large vacant lots available for housing complexes that would accommodate large numbers of dwelling units within the Coastal Zone. However, significant development opportunities exist within the Coastal Zone on underutilized commercial properties in the CD, CNE, and CL zones.

The City's Coastal Zone implements the California Coastal Act within the City. Sites within the City's Coastal Zone are required to obtain a discretionary permit to verify consistency of the proposed development with the California Coastal Act. Specifically, development as defined by the California Coastal Act Section 30102, within the Coastal Overlay Zone requires a Coastal Development Permit. Discretionary actions associated with a Coastal Development Permit can be a constraint to development within the Coastal Zone, as they can add time to the permit process, can increase the cost associated with development, and can increase development uncertainty. However, the City has a certified Local Coastal program which allows the City to issue coastal permits, which minimizes this constraint to the extent possible. Additionally, only one site in the Sites Inventory has been identified within the Coastal Zone to accommodate lower income housing capacity and no sites identified to be rezoned to accommodate lower-income housing capacity fall within the Coastal Zone, further minimizing this constraint as it relates to meeting the City's housing needs for lower-income housing.

The City has a certified LCP. The LCP was certified by the California Coastal Commission in 1994, and therefore the City is able to issue its own coastal permits. The LCP addresses three primary issue areas: public access, locating and planning for new development, and preservation of marine-related resources. The LCP includes a number of policies that affect the ability to develop new housing within the coastal areas of the City. These include policies related to the preservation of beach access, the provision of adequate parking (including requiring adequate off-street parking to be provided in new residential development), and controlling the types and densities of residential development within the Coastal Zone. Strategies of the Housing Element that intersect with coastal preservation policies most closely align with those policies detailed under Goal 1, which aims to preserve and enhance the existing housing stock. Housing Element Policy 1.1 states that the City will "Preserve the scale of development in existing residential neighborhoods." And Policy 1.3 states that the City will "Conserve existing dwelling units." Coastal policies related to residential development within the Coastal Zone include the following:

1. Policy II.B.1: Maintain building scale in Coastal Zone residential neighborhoods consistent with Chapter 2 of the Implementation Plan.
2. Policy II.B.2: Maintain residential building bulk control established by development standards in Chapter 2 of the Implementation Plan.
3. Policy II.B.3: Maintain Coastal Zone residential height limit not to exceed 30 feet as required by Sections A.04.030 and A.60.050 of Chapter 2 of the Implementation Plan.
4. Policy II.B.4: The beach shall be preserved for public beach recreation. No permanent structures, with the exception of bikeways, walkways, and restrooms, shall be permitted on the beach.

At the same time, the City seeks to process permits in the Coastal Zone as efficiently as possible. As noted above, certification of the City's LCP allows the City to process coastal permits locally, saving the time and expense of a separate Coastal Commission approval. Coastal Commission approval can take upwards of 18 to 24 months, whereas City approval of a Coastal Development Permit can take between 2 to 5 months. The City's Local Coastal Program saves time and money for applicants since they do not need to seek separate approval from the California Coastal Commission.

All decisions on Coastal Development Permits shall be accompanied by written findings:

1. That the project, as described in the application and accompanying materials, as modified by any conditions of approval, conforms with the certified Manhattan Beach Local Coastal Program; and
2. If the project is located between the first public road and the sea, that the project is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (Commencing with Section 30200 of the Public Resources Code).

While the need for discretionary approval for development within the Coastal Zone is a constraint to development, the reduction of permit processing time associated with City approval afforded by the certified Local Coastal Program significantly reduces this constraint, increasing the feasibility of development within the Coastal Zone. Further detail on permit timeframes and processes can be found in Section 2.4.

### 2.1.5 Condominium Conversions

MBMC Section 10.88.070 and LCP Section A.88.070 govern conversion of residential structures from rental units to condominiums (or any other form of multiple ownership interests), recognizing that conversions may significantly affect the balance between rental and ownership housing within the City, and thereby reduce the variety of individual choices of tenure, type, price, and location of housing; increase overall rents; decrease the supply of rental housing for all income groups; displace individuals and families; and disregard the needs of the prevailing consumer market. The purpose of these regulations is to provide guidelines to evaluate those problems, including the impact any conversion application may have on the community, and to establish requirements that shall be included in any conversion approval.

Requirements applicable to condominium conversions include, but are not limited to, tenant notification, notification of a right to purchase, tenant purchase discounts, and relocation expenses. Special provision is also made for lifetime leases for non-purchasing older adults or tenants with medical disabilities. In addition, low- and moderate-income tenants and those with children are provided an extended relocation period. In evaluating requests for condominium conversion, the Planning Commission must consider the impact of tenant displacement, with emphasis on existing low- and moderate-income tenants (see **Program 26, Replacement Requirements**, of the Housing Element for replacement requirements in accordance with SB 330 (2019)).

### 2.1.6 Short-Term Rentals

Short-term rentals and other transient uses in residential zones can have a severe negative impact on the character and stability of the residential zones and its residents. Transient uses, including short-term rentals (less than 30 days), in residential zones are not allowed under MBMC Chapter 4.88, and are incompatible with the goals and objectives of the City's General Plan. The General Plan aims to preserve and maintain residential neighborhoods, and to protect residential neighborhoods from the intrusion of incompatible and character-changing uses.

## 2.2 Provisions for Special Housing Types

Per Government Code Section 65583(a), persons with special needs include those in residential care facilities; persons with disabilities; and persons needing emergency shelter, transitional or supportive



housing, and low-cost single-room-occupancy units. The City’s regulations regarding these housing types are discussed below.

### 2.2.1 Senior Housing/Housing for Older Adults

A senior housing development is defined by Section 51.3 of the California Civil Code as a residential development substantially rehabilitated or substantially renovated for senior citizens, commonly referred to as older adults. The units are restricted for use by qualifying residents. While the MBMC does not identify senior housing (independent living) as a stand-alone use classification, it qualifies as a multifamily residential use and can be constructed in all zones that allow for multifamily residential development via the same processes as described in Section 2.1.2.6, Multifamily Dwelling Units. Accordingly, senior housing is allowed in the following zoning districts: RM, RH, RSC, RPD, CL, CD, and CNE.

The City provides various incentives and streamlined approval to developers in exchange for senior housing, consistent with those incentives defined by the State density bonus law. In addition, the MBMC provides a less-stringent parking requirement for senior housing, as detailed below and in Table 7:

- 0.5 spaces per unit plus one accessible and designated guest space per every five units
- 1 space per non-resident employee and 1 loading area (11 feet wide × 30 feet long × 10 feet high).

### 2.2.2 Boarding Homes/Group Residential

Group residential it is not considered a residential care facility and is defined in MBMC Section 10.08.030.C as “shared living quarters with not more than five guest rooms and without separate kitchen or bathroom facilities for each guest room, and where either of the following apply:

1. Lodging and meals for compensation are provided by pre-arrangement for definite periods for not more than nine persons, or
2. Rooms, beds or spaces within the living quarters are rented to 10 or more individuals by pre-arrangement for definite periods. Shared living quarters with six or more guest rooms or where lodging and meals for compensation are provided for 10 or more persons shall be considered a Visitor Accommodation.”

Group residential facilities require 1 parking space per every 2 beds, plus 1 parking space per 100 square feet used for assembly purposes in accordance with the MBMC.

Group residential facilities are a conditionally permitted use in the High-Density Residential (RH) and Residential Senior Citizen (RSC) zones. Use permits are reviewed and approved by the Planning Commission at a public hearing; see Section 2.4.3, Conditional Use Permit (Use Permit), for details.

### 2.2.3 Community Care Facilities

Community care facilities are defined by Section 1502 of the Health and Safety Code as any facility, place, or building that is maintained and operated to provide nonmedical residential care, day treatment, adult daycare, or foster family agency services for children, adults, or children and adults, including, but not limited to, the physically handicapped, mentally impaired, incompetent persons, and abused or neglected children, and includes residential facilities, adult day programs, therapeutic day

services facilities, foster family agencies, foster family homes, small family homes, social rehabilitation facilities, and community treatment facilities.

#### 2.2.3.1 Residential Care Facilities

Health and Safety Code Sections 1267.8, 1566.3, 1568.08 require local governments to treat licensed group homes and residential care facilities with six or fewer residents no differently than other single-family residential uses. "Six or fewer persons" does not include the operator, the operator's family, or persons employed as staff. Local agencies must allow these licensed care facilities in any area zoned for residential use, and may not require licensed residential care facilities for six or fewer persons to obtain conditional Use Permits (Use Permits) or variances that are not required of other family dwellings. Large residential care facilities (those with seven or more residents) are subject to local land use regulations and other restrictions, such as Conditional Use Permit (Use Permit) requirements.

Residential Care, Limited is defined in MBMC Section 10.08.030.E as "Twenty-four (24) hour non-medical care for six (6) or fewer persons in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California." These facilities are a permitted use in all residential zones (RS, RM, RH, RPD, and RSC) in conformance with State law.

Residential Care, General is defined in MBMC Section 10.08.040.N as "Twenty-four (24) hour non-medical care for seven (7) or more persons, including wards of the juvenile court, in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California." These facilities are conditionally permitted uses requiring a Use Permit in the RH, RPD, RSC, CG (General Commercial), and PS (Public and Semi-Public) zones subject to approval of a Use Permit by the Planning Commission; see Section 2.4.3, Conditional Use Permit (Use Permit), for details. These regulations do not pose an unreasonable constraint as they are conditionally permitted in several zones, providing a variety of areas in the City where they could potentially be developed, and the Use Permits are allowed in accordance with State law.

State law requires that a residential care facility have a valid license to operate (Section 1568.5 of the Health and Safety Code). Over concentration of certain care homes in a neighborhood is also regulated by the state for licensed facilities. Regulations associated with state licensing increase the complexity associated with large residential care facilities. For example, licenses issued by the Department of Social Services (except for foster homes and elderly care) must be a minimum of 300 feet away from any other licensed home (as measured from the outside walls of the house - Section 1520.5 of the CA Health and Safety Code). The increased complexity associated with large residential care facilities can cause conflict between zoning code regulations and state requirements when these uses are permitted without discretion. While discretionary permits can constrain development through increased timing associated with permitting, the Use Permit associated with large residential care facilities is necessary for such project complexity.

Further, the Planning Commission will only deny a use permit if the permit findings cannot be met. Most recently, the Manhattan Beach Planning Commission approved the Sunrise Assisted Living Facility, a Large Residential Care Facility in July 2021. This new Large Residential Care Facility will provide a new 80,000 square foot assisted living facility serving older adults within the D9-Sepulveda Corridor overlay in the CG zone. The facility will consist of 95 rooms (115 total beds), including 64 assisted living rooms

and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss. This key example shows that while the discretionary permit may be perceived as a constraint to development, this use is not excluded, and development of Residential Care facilities serving seven or more persons is occurring in the City under the requirements and regulations (Permit findings associated with Use Permits are further detailed in Section 2.4.3). Nonetheless, the City will mitigate any potential constraints that may be posed by a Use Permit for Residential Care Facilities by making the approval process more predictable and transparent. Currently, Residential Care, General facilities are subject to the broader findings for all Use Permits outlined in Section 10.84.060 - Required Findings, of the MBMC. Through Program 28 of the Housing Element, the City will amend the Zoning Code to include findings specific to Use Permits for Residential Care, General (serving seven or more persons) facilities. The City will ensure the findings are objective and improve certainty in the development approval process to better facilitate the production of Residential Care Facilities to serve the needs of the community. There are no concentration or separation requirements for residential care facilities or group homes in the MBMC. Furthermore, there are no special site planning requirements (other than parking, height, and setbacks) for residential care facilities in the Planning and Zoning Code.

Code requirements for off-street parking are as follows:

- Residential Care, Limited: 1 space per 3 beds.
- Residential Care, General: 1 space per 3 beds, plus additional spaces, as specified by Use Permit.

#### 2.2.4 Definition of Family

Fair housing law prohibits defining family (and by extension living quarters) in terms of the relationship of members (e.g., marital status), number of occupants (e.g., family size), or any other characteristics. Other definitions should also be consistent with fair housing law. The City defines family as “a single individual or two (2) or more persons living together as a single housekeeping unit in a dwelling unit, provided that this shall not exclude the renting of rooms in a dwelling unit as permitted by district regulations” in MBMC Section 10.04.030. Furthermore, “dwelling unit” is defined as “one (1) or more rooms with a single kitchen, designed for occupancy by one (1) family for living and sleeping purposes.”

The definition of “family” is in compliance with State requirements, as it does not require a certain relationship among the members, nor does it limit the size or specify other characteristics. Therefore, the definition of “family” does not constrain or limit development of residential care facilities or other specialized housing for unrelated individuals and those with disabilities or special needs.

#### 2.2.5 Emergency Shelters, Transitional Housing, and Supportive Housing

State law (Assembly Bill [AB] 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing, and establishes transitional and supportive housing as a residential use. Therefore, local governments cannot treat it differently from other similar types of residential uses (e.g., requiring a Use Permit when other residential uses of similar function do not require a Use Permit).

##### Transitional Housing

Transitional housing is longer-term housing, typically up to 2 years. Transitional housing generally requires that residents participate in a structured program to work toward established goals so that they

can move on to permanent housing. Residents are often provided with an array of supportive services to assist them in meeting goals. The Zoning Code defines transitional housing as “rental housing operated under program requirements that terminate assistance to residents and recirculate the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six (6) months from the initial occupancy date of the recipient.”

Under SB 2, transitional and supportive housing is deemed to be a residential use subject only to the same requirements and standards that apply to other residential uses of the same type in the same zone. The Zoning Code does not pose as a constraint to development because it allows transitional housing as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone in accordance with State law.

#### Supportive Housing

Supportive housing is defined in the Zoning Code as housing occupied by a specified target population defined in Section 50675.14 of the California Health and Safety Code that has no limit on length of stay and that is linked to on-site or off-site services that assist the resident in retaining the housing; improving his or her health status; and maximizing his or her ability to live, and, when possible, work in the community. The Zoning Code treats supportive housing as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone.

Under AB 2162, supportive housing meeting specific standards shall be a use by right in all zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses. Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within 0.5 miles of a public transit stop (Government Code Section 65915).

**Program 28, Specialized Housing Types to Assist Persons with Special Needs**, of the Housing Element will amend the City’s Zoning Code to comply with State law.

#### Emergency Shelters

The MBMC allows emergency shelters by-right in the Public and Semi-Public (PS) and Industrial Park (IP) zones. These districts include vacant and underutilized parcels that could support emergency shelters, and also have good access to transit and other services. An application for a permit to establish and operate an emergency shelter shall be accompanied by a management plan that should incorporate the following: hours of operation, staffing levels and training procedures, maximum length of stay, size and location of exterior and interior on-site waiting and intake areas, admittance and discharge procedures, provisions for on-site or off-site supportive services, house rules regarding use of alcohol and drugs, on-site and off-site security procedures, and protocols for communications with local law enforcement agencies and surrounding property owners.

The MBMC does not currently include a specific parking requirement for any of these uses, other than standard residential requirements. **Program 28** of the Housing Element will amend the City’s Zoning Code to ensure that parking requirements for emergency shelters accommodate the staff working in the shelter, but do not require more parking than other residential or commercial uses within the same zone (AB 139, 2019).

### 2.2.6 Low-Barrier Navigation Centers

Low-Barrier Navigation Centers are housing-first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. A Low-Barrier Navigation Center is defined as housing or shelter in which a resident who is experiencing homelessness, or at risk of homelessness, may live temporarily while waiting to move into permanent housing. SB 101 requires a jurisdiction to allow a Low-Barrier Navigation Center by-right in areas zoned for mixed use and nonresidential zones permitting multifamily uses if they meet the requirements of Article 12 (commencing with Section 65660) of Chapter 3, Division 1, Title 7 of the California Government Code.

The MBMC does not currently define Low-Barrier Navigation Centers; therefore, it also does not identify zoning districts in which this use is permitted. To comply with State law, the City would have to classify the use in MBMC Section 10.08 , Use Classifications, and then include it as a permitted use in the CL, CD, and CNE zones. **Program 28** of the Housing Element will amend the MBMC to permit the development of Low-Barrier Navigation Centers that meet the requirements of State law as a use by-right, without requiring a discretionary action, in mixed-use and nonresidential zones that permit multifamily uses (AB 101).

### 2.2.7 Employee Housing

Pursuant to the State Employee Housing Act (Section 17000 et seq. of the Health and Safety Code), employee housing for agricultural workers consisting of no more than 36 beds in group quarters, or 12 units or spaces designed for use by a single family or household is permitted by right in a zoning district that permits agricultural uses by right. Therefore, for properties that permit agricultural uses by right, a local jurisdiction may not treat employee housing that meets the above criteria any differently than an agricultural use.

The Employee Housing Act also requires that housing for six or fewer agricultural employees be treated as a regular residential use. This mandates that employee housing shall not be required to apply for any additional permit or process that would not be required of a residential structure in the same zone.

Employee housing is not currently defined in the MBMC; accordingly, no specific provisions are included regarding this use. However, the City does not currently have any zones that permit agricultural uses given that no agricultural land exists in the City. If the Zoning Code is ever amended to add a zoning district that permits agricultural uses, **Program 25** of the Housing Element commits the City to make all corresponding MBMC amendments related to agricultural workers and current employee housing requirements.

### 2.2.8 Single-Room Occupancy Units

State law mandates that local jurisdictions address the provision of housing options for extremely low-income households, including single-room-occupancy (SRO) units. SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other.

The MBMC does not currently define or include provisions for SROs. However, MBMC Section 10.08.050.DD.2 defines residential hotels as “buildings with six (6) or more guest rooms without kitchen facilities in individual rooms, or kitchen facilities for the exclusive use of guests, and which are intended for occupancy on a weekly or monthly basis.” Residential hotels are similar to SRO facilities and are conditionally permitted in the General Commercial (CG) zone. In accordance with the MBMC, residential hotels require 1.1 parking spaces per room. Requiring more than 1 parking space per room may pose a constraint to development; however, the City is currently evaluating parking regulations, and anticipates requirements being updated within the next year, including a revision to required parking for residential hotels to 0.9 spaces per room.

## 2.3 Building Standards and Enforcement

Building and safety codes are adopted to preserve public health and safety, and to ensure the construction of safe and decent housing. These codes and standards have the potential to increase the cost of housing construction and/or maintenance. Further, required permits and processes associated with development can extend project timelines and associated costs.

In an effort to increase transparency of the development permitting process, the California Legislature adopted AB 1483 in 2019 (Government Code section 65940.1) to require jurisdictions to post detailed information regarding development proposal requirements. A jurisdiction shall make all of the following available on its website, as applicable, and update any changes to the information within 30 days of the change:

- A current schedule of fees, exactions, and affordability requirements imposed by the city, applicable to a proposed housing development project, which shall be presented in a manner that clearly identifies the fees, exactions, and affordability requirements that apply to each parcel.
- All zoning ordinances and development standards, which shall specify the zoning, design, and development standards that apply to each parcel.
- The list required to be compiled of information that will be required from any applicant for a development project.
- The current and five previous annual fee reports or the current and five previous annual financial reports.
- An archive of impact fee nexus studies, cost of service studies, or equivalent, conducted by the city on or after January 1, 2018.

The City has complied with the new transparency law requirements on the City’s website in conformance with AB 1483, and as outlined in **Program 12, Developer Outreach and Transparency**, of the Housing Element, the City will maintain current information on the City’s website and update relevant information that is applicable for housing development project proposal requirements within 30 days of any changes, consistent with AB 1483.

### 2.3.1 Building Code Requirements

State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic, or topographic conditions, and requires that local governments making changes or modifications in building standards report such changes to the Department of Housing and Community Development and file an expressed finding that the change is needed. The City has adopted the most recent Building Standards Code and local amendments to the following codes: 2019 California Building Code, 2019 California Residential Code, 2019 California Electrical Code, 2019 California Plumbing Code, 2019 California Mechanical Code, 2019 California Existing Building Code, 2019 California Green Building Standards Code, 2019 California Energy Code, 2019 California Administrative Code, 2019 California Historical Building Code, 2019 California Referenced Standards Code, and 1997 Uniform Code for the Abatement of Dangerous Buildings under Ordinance No. 19-0015. The City adopted findings stating that amendments to certain provisions were necessary because of the unique climatic, geological, and topographical conditions prevailing within the City. The City's adopted local amendments and associated findings were accepted by the Building Standards Commission. The amended provisions do not pose an unnecessary constraint to housing development.

### 2.3.2 Code Enforcement

The City has an active code enforcement program that responds to complaints of substandard structures. In addition, a Report of Residential Building Records is required each time a property is sold, which serves to alert all parties to unpermitted and potentially substandard construction that may exist on the subject site.

Code enforcement staff accept reports of possible code violations and respond directly to violations related to compliance with the MBMC, including zoning, property maintenance, illegal dwelling units, trash container regulations, and sign violations. Possible violations regarding substandard, nonstructural housing issues are referred to the Environmental Health Division of the Los Angeles County Department of Public Health. The County of Los Angeles Environmental Health Division is responsible for ensuring that residential housing is safe, sanitary, and fit for human habitation. This is accomplished through routine inspections of rental properties with five or more units, and investigations of complaints. From July 2016 to July 2021, the County of Los Angeles performed 52 inspections in the City of Manhattan Beach.

Through implementation of **Program 8, Code Compliance**, of the Housing Element, the City will continue to ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources.

### 2.3.3 Fair Housing and Americans with Disabilities Act

The Federal Fair Housing Act of 1968 and the Americans with Disabilities Act (ADA) are Federal laws intended to assist in providing safe and accessible housing. ADA provisions include requirements for a minimum percentage of units in new developments to be fully accessible for persons with physical disabilities. Compliance with these regulations may increase the cost of housing construction and the

cost of rehabilitating older units, which may be required to comply with current codes. However, the enforcement of ADA requirements is the best way to ensure that there is housing available and accessible to meet the needs of all residents, especially those with special needs. The City requires full compliance with ADA regulations when applicable to a project. This, in turn, ensures that housing projects that are subject to ADA regulations account for persons with disabilities, thereby increasing the accessible housing stock within the City.

The Community Development Block Grant (CDBG) Program provides for the development of viable urban communities by providing decent housing, a suitable living environment, and expanded economic opportunities primarily for low- and moderate-income residents, as well as older adults and people with disabilities. Eligible activities under the CDBG Program include activities related to housing, other real property activities (code enforcement, historic preservation), public facilities, activities related to public services, activities related to economic development, and assistance with community-based development organizations. CDBG funds may be used for the acquisition, construction, reconstruction, rehabilitation, or installation of certain public improvements or public facilities. Since 2016, the City has used its annual CDBG allocation for infrastructure improvements, specifically installation of ADA-compliant curb ramps throughout City intersections. Most recently (as of fiscal year 2018), CDBG funds were allocated to the implementation of the Manhattan Senior Villas ADA Pathway Project. These efforts supported the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, curb ramp, and gutter to create unobstructed paths of travel and accessibility for older adults and those with disabilities to Manhattan Senior Villas, located at 1300 Parkview Avenue. Construction is anticipated to begin this year (2021). Through implementation of **Program 5, Americans with Disability Act (ADA) Improvements Program**, the City will ensure that the Manhattan Senior Villas ADA Pathway Project is completed by 2022 to increase accessibility for older adults and people with disabilities in the City. Following completion of the Senior Villas ADA Pathway Project, the City will use future CDBG funds for additional ADA improvements focused on bringing existing, non-compliant ramps into ADA compliance at various locations throughout the City, as identified by the Public Works Department. These improvements will increase accessibility for people with disabilities throughout the City.

In addition, the City has included a number of programmatic measures to comply with the Federal Fair Housing Act in the Housing Element, including the following:

- Providing fair housing referral services with the Housing Rights Center, including landlord/tenant counseling, outreach and education, and discrimination investigations.
- Developing a handout for developers to be made aware of Fair Housing advertisement material compliance and making it available at the City Hall counter.
- Supporting and participating in the Regional Analysis of Impediments to Fair Housing Choice in coordination with the Community Development Commission of the County of Los Angeles and the Housing Authority of the County of Los Angeles.

#### 2.3.3.1 Reasonable Accommodation Procedures

The City is required by the Federal Fair Housing Act and the California Fair Employment Housing Act to provide a process for consideration of reasonable accommodation requests. The process shall include a deviation procedure that is available to applicants for circumstances where the existing zoning regulations would preclude residential development for persons with disabilities.



In conformance with State and Federal fair housing laws, MBMC Section 10.85 establishes the City's procedures related to requests for reasonable accommodations from the strict application of the City's land use and zoning regulations to allow people with disabilities an equal opportunity to use and enjoy a dwelling. "Reasonable accommodation" means any deviation requested and/or granted from the City's zoning and land use laws, rules, regulations, policies, procedures, practices, or any combination thereof that may be reasonable and necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling.

To make housing available to people with disabilities, any eligible person may request a reasonable accommodation from the strict application of land use, zoning and building regulations, policies, practices, and procedures. Any information identified by an applicant as confidential shall be retained in a manner so as to respect the privacy rights of the applicant and shall not be made available for public inspection unless required by State or Federal law. A request for a reasonable accommodation may be filed at any time that the accommodation may be necessary to ensure equal access to housing. A reasonable accommodation does not affect a person's obligations to comply with other applicable regulations not at issue in the requested accommodation.

Requests for a reasonable accommodation shall be reviewed by the Community Development Director (Director), and may, in their discretion, refer applications to the Planning Commission for consideration. The request for a reasonable accommodation shall be approved, or approved with conditions, if the reviewing authority finds that all of the following findings can be made:

- A. The dwelling, which is the subject of the request for reasonable accommodation, will be used by a disabled person;
- B. The requested accommodation is necessary to make housing available to a disabled person;
- C. The requested accommodation will not impose an undue financial or administrative burden on the City; and
- D. The requested accommodation will not require a fundamental alteration in the nature of the City's Zoning Ordinance.

The written decision on the request for reasonable accommodation shall explain in detail the basis of the decision, including all findings. The written decision shall be final, unless the applicant appeals the decision.

While requests are seldomly referred to the Planning Commission for their consideration, and there are no public hearing or noticing requirements tied to Planning Commission review, the Zoning Code does not outline the bases on which a decision on the matter could or should be deferred to the Planning Commission. In an effort to proactively remove ambiguities that may impose extra constraints for people with disabilities, **Program 25, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**, of the Housing Element will amend the reasonable accommodation procedures to remove discretionary referrals to the Planning Commission so that requests shall be reviewed and may be granted by the Community Development Director. In addition, the City will develop materials and outreach methods to increase public awareness and ease of access to policies, programs, and processes addressing reasonable accommodation.

## 2.4 Development Processing Procedures

Local processing and permit procedures can constrain the development of housing through unnecessary discretionary permit requirements, lengthy permit processing timelines, and subjective requirements that leave uncertainties in the overall development design and density. Discretionary actions can be required for development design reviews, required Use Permits, zone or plan amendments, and subdivisions. Whereas ministerial, or by-right, permits involve application of objective standards and criteria.

Further, in accordance with Section 65913.4 of the California Government Code, also known as SB 35, a permit applicant may submit an application for a development that is subject to the streamlined, ministerial approval process and is not subject to a Conditional Use Permit if they meet the objective planning standards, as outlined in the Government Code and as summarized as follows:

- Multifamily housing developments on infill sites zoned for residential or residential mixed-use.
- A minimum of 10 percent of the units are dedicated as affordable to households earning 80 percent or less of the area median income.
- For developments with 10 or more units, a prevailing wage requirement is included in all contracts for the performance of work.

Jurisdictions do not need to adopt a local ordinance to implement the ministerial processing provided by SB 35. The City reports annually on any applications received pursuant to SB 35. To proactively remove any potential constraints to development, the City will revise internal permitting procedures to ensure that staff has clear procedures for responding to proposals for SB 35 streamlining and for prioritizing qualifying SB 35 housing developments consistent with State law through implementation of **Program 3, Affordable Housing Streamlining**, of the Housing Element.

### 2.4.1 Precise Development Plan

Precise Development Plans (PDPs) are intended to encourage the development of affordable housing through a streamlined permitting process. Projects in the RM, RH, and RPD zones that qualify for a density bonus pursuant to State density bonus law shall be eligible for a PDP (MBMC Section 10.84.010). Applications for PDPs shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, and plans and mapping documentation in the form prescribed by the Community Development Director; and
2. A vicinity map showing the location and street address of the development site.

The Director shall approve, conditionally approve, or disapprove applications for PDPs. An application for a PDP shall be approved if, on the basis of the application, plans, materials, and testimony submitted, the decision-making authority finds the following:

1. The proposed project is consistent with the General Plan and Local Coastal Program; and

2. The physical design and configuration of the proposed project are in compliance with all applicable zoning and building ordinances, including physical development standards.

Failure to make all the required findings shall require denial of the application. In approving a PDP, reasonable conditions may be imposed as necessary to make the required findings. Unless appealed, the PDP shall become effective after expiration of the time limits for appeal.

To minimize constraints to the development of affordable housing that may result from discretionary permitting procedures, the City will amend the Zoning Code to ensure PDP applications are subject only to an administrative non-discretionary approval process through implementation of **Program 3** of the Housing Element.

As previously mentioned, multifamily projects in residential zones that qualify for a density bonus pursuant to State density bonus law shall be eligible for a PDP. It is worth noting that while the intent of the 5th Cycle Housing Element policies was to extend the PDP process to density bonus projects in the CL, CNE, and CD zones, the Code amendments that followed the adoption of the 5th Cycle Housing Element did not implement the policies as described in the Housing Element; therefore, the commercial land uses table in MBMC Section 10.16, and as shown in Tables 2 and 4 of this analysis, still reference Use Permits (see Section 2.4.3) as the applicable application process for residential or mixed-use projects in the CL, CNE, and CD zones, with no mention of the PDP process. As such, through implementation of **Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts**, of the Housing Element, the City will amend the Zoning Code to permit residential uses without requiring approval of a Use Permit in the CL, CD, and CNE zones, and provide streamlined processing for projects that qualify for a density bonus.

#### 2.4.2 Site Development Permit

Site Development Permits (SDPs) are intended to streamline the permitting process for market-rate multifamily housing developments of six or more units (MBMC Section 10.84.010). Multifamily projects are permitted in the residential zones (RM, RH, and RPD) subject to an SDP. Pursuant to MBMC Section 10.84.030, applications for Site Development Permits shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, plans and mapping documentation in the form prescribed by the Director;
2. A vicinity map showing the location and street address of the development site;
3. A map showing the location and street address of the property that is the subject of the amendment and of all lots of record within five hundred feet (500') of the boundaries of the property; and
4. A list, drawn from the last equalized property tax assessment roll or the records of the County Assessor, Tax Collector, or the City's contractor for such records showing the names and addresses of the owner of record of each lot within five hundred feet (500') of the boundaries of the property. This list shall be keyed to the map required by subsection (C) of this section and shall be accompanied by mailing labels.

The Planning Commission shall hold a public hearing on an application for a Site Development Permit and shall approve said permit if, on the basis of the application, plans, materials, and testimony submitted, the decision making authority finds that:

1. The proposed project is consistent with the General Plan and Local Coastal Program.
2. The physical design and configuration of the proposed project are in compliance with all applicable zoning and building ordinances, including physical development standards.

Unless appealed, the SDP shall become effective after expiration of the time limits for appeal.

As in the case of the PDP, the 5th Cycle Housing Element policies intended to extend the SDP process to market rate residential and mixed-use projects in the CL, CNE, and CD zoning districts, but the Code amendments that followed the adoption of the 5th Cycle Housing Element failed to implement this policy as intended in the commercial land uses table of MBMC Chapter 10.16. In accordance with MBMC Section 10.84.020, the Planning Commission currently approves, conditionally approves, or disapproves applications for SDPs; however, the 5th Cycle Housing Element specifically identified that the Planning Commission's review of SDPs are limited to confirming that the project complies with applicable development standards, and does not examine the appropriateness of the use itself. Although Zoning Code revisions to the SDP application process are not included through implementation of the 6th Cycle Housing Element's programs, the City will evaluate necessary revisions and amend the Zoning Code, if feasible, to clearly reflect the review process for SDPs intended by the 5th Cycle Housing Element, and remove constraints to development.

### 2.4.3 Conditional Use Permit (Use Permit)

Commonly known as Conditional Use Permits, Use Permits are required for use classifications typically having unusual site development features, or operating characteristics requiring special consideration so that they may be designed, located, and operated compatibly with uses on adjoining properties and in the surrounding area. Pursuant to MBMC Section 10.84.030, the Planning Commission shall approve, conditionally approve, or disapprove applications for Use Permits.

Applications for Use Permits shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, plans and mapping documentation in the form prescribed by the Director;
2. A vicinity map showing the location and street address of the development site;
3. A map showing the location and street address of the property that is the subject of the amendment and of all lots of record within five hundred feet (500') of the boundaries of the property; and
4. A list, drawn from the last equalized property tax assessment roll or the records of the County Assessor, Tax Collector, or the City's contractor for such records showing the names and addresses of the owner of record of each lot within five hundred feet (500') of the boundaries of the property. This list shall be keyed to the map required by subsection (C) of this section and shall be accompanied by mailing labels.

The Planning Commission shall hold a public hearing on an application for a Use Permit. An application for a Use Permit shall be approved if, on the basis of the application, plans, materials, and testimony submitted, the Planning Commission finds that:

1. The proposed location of the use is in accord with the objectives of this title and the purposes of the district in which the site is located;

2. The proposed location of the use and the proposed conditions under which it would be operated or maintained will be consistent with the General Plan; will not be detrimental to the public health, safety or welfare of persons residing or working on the proposed project site or in or adjacent to the neighborhood of such use; and will not be detrimental to properties or improvements in the vicinity or to the general welfare of the city;
3. The proposed use will comply with the provisions of this title, including any specific condition required for the proposed use in the district in which it would be located; and
4. The proposed use will not adversely impact nor be adversely impacted by nearby properties. Potential impacts are related but not necessarily limited to: traffic, parking, noise, vibration, odors, resident security and personal safety, and aesthetics, or create demands exceeding the capacity of public services and facilities which cannot be mitigated.

Failure to make all the required findings shall require denial of the application. In approving a Use Permit, reasonable conditions may be imposed as necessary to make the required findings. Unless appealed, the Use Permit shall become effective after expiration of the time limits for appeal.

#### 2.4.4 Variances

Variances are intended to resolve practical difficulties or unnecessary physical hardships that may result from the size, shape, or dimensions of a site, or the location of existing structures thereon, from geographic, topographic, or other physical conditions on the site or in the immediate vicinity, or from street locations or traffic conditions in the immediate vicinity of the site. Pursuant to MBMC Section 10.84.010, Variances may be granted with respect to fences, walls, landscaping, screening, site area, site dimensions, yards, height of structures, distances between structures, open space, off-street parking and off-street loading, and performance standards.

Authorization to grant Variances does not extend to use regulations because sufficient flexibility is provided by the Use Permit process for specified uses and by the authority of the Planning Commission to determine whether a specific use belongs within one or more of the use classifications listed in MBMC Chapter 10.08. Further, MBMC Chapter 10.96 provides procedures for amendments to the zoning map or zoning regulations.

The Planning Commission shall approve, conditionally approve, or disapprove applications for Variances. Applications for Variances shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, plans and mapping documentation in the form prescribed by the Director;
2. A vicinity map showing the location and street address of the development site;
3. A map showing the location and street address of the property that is the subject of the amendment and of all lots of record within five hundred feet (500') of the boundaries of the property; and
4. A list, drawn from the last equalized property tax assessment roll or the records of the County Assessor, Tax Collector, or the City's contractor for such records showing the names and addresses of the owner of record of each lot within five hundred feet (500') of the

boundaries of the property. This list shall be keyed to the map required by subsection (C) of this section and shall be accompanied by mailing labels.

The Planning Commission shall hold a public hearing on an application for a Variance. An application for a Variance shall be approved if, on the basis of the application, plans, materials, and testimony submitted, the decision making authority finds that:

1. Because of special circumstances or conditions applicable to the subject property—including narrowness and hollowness or shape, exceptional topography, or the extraordinary or exceptional situations or conditions—strict application of the requirements of this title would result in peculiar and exceptional difficulties to, or exceptional and/or undue hardships upon, the owner of the property;
2. The relief may be granted without substantial detriment to the public good; without substantial impairment of affected natural resources; and not be detrimental or injurious to property or improvements in the vicinity of the development site, or to the public health, safety or general welfare; and
3. Granting the application is consistent with the purposes of this title and will not constitute a grant of special privilege inconsistent with limitations on other properties in the vicinity and in the same zoning district and area district.
4. OS District Only. Granting the application is consistent with the requirements of Section 65911 of the Government Code and will not conflict with General Plan policy governing orderly growth and development and the preservation and conservation of open-space laws.

Failure to make all the required findings shall require denial of the application. In approving a Variance, reasonable conditions may be imposed as necessary to make the required findings. Unless appealed, the Variance shall become effective after expiration of the time limits for appeal set forth in MBMC Section 10.100.030.

#### 2.4.5 Minor Exceptions

Minor Exceptions are generally intended to allow certain alterations and additions to certain nonconforming pre-existing structures, and to allow the establishment of new ADUs within legal pre-existing structures that do not comply with the ADU development standards. Minor Exceptions are also intended to encourage home remodeling and additions to existing smaller, older, legal non-conforming homes. The provisions strive to balance the community's desire to maintain smaller, older homes while still allowing some flexibility to encourage these homes to be maintained, upgraded, and enlarged below the maximum allowed square footage instead of being replaced with larger new homes.

Applications for all Minor Exceptions shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fees, plans and mapping documentation in the form prescribed by the Director.
2. Written statements to support the required findings and criteria of this Code section.
3. A vicinity map showing the location and street address of the development site.

As specified in MBMC Section 10.84.120, certain Minor Exception requests require public notice, while others do not. After the commenting deadline date, if any, and within 30 days of receipt of a completed application, the Director shall approve, conditionally approve, or deny the required exception. The Director of Community Development shall send the applicant a letter stating the reasons for the decision under the authority for granting the exception, as provided by the applicable sections of this chapter. The letter also shall state that the Director's decision is appealable. In making a determination, the Director shall be required to make the following findings:

- a. The proposed project will be compatible with properties in the surrounding area, including, but not limited to, scale, mass, orientation, size and location of setbacks, and height.
- b. There will be no significant detrimental impact to surrounding neighbors, including, but not limited to, impacts to privacy, pedestrian and vehicular accessibility, light, and air.
- c. There are practical difficulty which warrants deviation from Code standards, including, but not limited to, lot configuration, size, shape, or topography, and/or relationship of existing building(s) to the lot.
- d. That existing non-conformities will be brought closer to or in conformance with Zoning Code and Building Safety requirements where deemed to be reasonable and feasible.
- e. That the proposed project is consistent with the City's General Plan, the purposes of this title and the zoning district where the project is located, the Local Coastal Program, if applicable, and with any other current applicable policy guidelines.

In approving a minor exception permit, the Director may impose reasonable conditions necessary.

#### 2.4.6 Density Bonus Requirements

Under State law (AB 2345, 2020), cities and counties must provide a density increase up to 50 percent over the otherwise maximum allowable residential density under the Municipal Code and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with units affordable to low- or moderate-income households. The City has a standard application and review procedure for processing density bonus applications as part of housing development applications, as included in MBMC Section 10.94.050. MBMC Chapter 10.94, Affordable Housing Density Bonus and Incentive Program, was last updated in 2013 to include density bonus regulations in conformance with State law. Since then, State density bonus laws have been updated (pursuant to Government Code Sections 65915–65918). Discrepancies in MBMC Chapter 10.94 that must be addressed to comply with 2021 density bonus regulations include, but are not limited to, the following:

- The maximum allowed percentage density bonus must be increased from the MBMC's existing maximum of 35 percent to 50 percent to reflect the allowances found in Government Code Section 65915(f).
- Remove the limit on one incentive or concession for senior housing developments found in Section 10.94.040(A)(2) of the MBMC.
- In addition to the three affordable housing concessions or incentives currently offered in Section 10.94.040(A)(4) of the MBMC, current State law (2021) allows for a fourth incentive for projects that are located within 0.5 miles of a transit stop. The application shall also receive a height increase of up to three additional stories or 33 feet.

- The first required finding the City may use to deny a requested incentive or concession in Section 10.94.040(B)(1) of the MBMC must be updated to reflect the latest language for the first required finding found in Government Code Section 65915(d)(1)(A).
- The required parking for units with two to three bedrooms in Section 10.94.040(C)(2) of the MBMC should be revised from two required on-site spaces per unit to one-and-a-half on-site parking spaces per unit.

The City incentivizes development of affordable housing by abiding by the local and State density bonus regulations. In addition, to further incentivize affordable units, multifamily projects in residential (RM, RH, and RPD) zones that qualify for a density bonus are eligible for a streamlined approval process, which will be further revised to ensure an administrative non-discretionary approval process through implementation of **Program 3** of the Housing Element. In addition, implementation of **Program 18** of the Housing Element will provide a streamlined approval process for multifamily projects that qualify for a density bonus in the mixed-use (CL, CD, and CNE) zones (refer to Section 2.4.1, Precise Development Plan, for additional details).

As stated in Section 10.94.010, General Affordable Housing Provisions, of the MBMC and in Government Code Section 65915, the granting of a density bonus, concession or incentive, shall not require, or be interpreted, in and of itself, to require a general plan amendment, local coastal plan amendment, zoning change, or other discretionary approval. As such, the city-wide election requirements under MBMC Section 10.12.030 for certain amendments to development standards in the RS, RM, and RH zones do not restrict the ability of the City to provide flexibility for development under State Density Bonus Law.

#### 2.4.7 Typical Permit Procedures

State planning and zoning law provides permit processing requirements for residential development. Within the framework of State requirements, the City has structured its development review process to minimize the time required to obtain permits while ensuring that projects receive careful review. The permit review and approval process for single- and multifamily residential developments is described below.

##### **Single-Family Development**

Single-family development on a previously subdivided lot is a straightforward process. A building permit application is submitted, and plans are reviewed by the City to ensure compliance with City laws and standards, including planning and zoning standards such as building height and setbacks. Building permits are issued administratively and do not require a public hearing. The City does not have any separate design review process.

If a project is located in the Coastal Zone, a Coastal Development Permit (CDP) is also required. Administrative CDP approval by the Director is required for any new single-family residence and multifamily residence (excluding remodels and additions) in the non-appealable area of the Coastal Zone. In the appealable area of the Coastal Zone (within 300 feet of the inland extent of any beach), administrative CDP approval by the Director is required for any new single-family and multifamily residence, as well as an increase of 10 percent or more of the internal floor area of the existing structure or the construction of an additional story or increase in building height of more than 10 percent. Any project located within the Coastal Zone compares similarly to a regular plan check located outside the



Coastal Zone, with no extra requirements and findings, aside from those that ensure consistency with the Local Coastal Program as follows:

1. That the project, as described in the application and accompanying materials, as modified by any conditions of approval, conforms with the certified Manhattan Beach Local Coastal Program; and
2. If the project is located between the first public road and the sea, that the project is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (Commencing with Section 30200 of the Public Resources Code).

The City's LCP has been certified by the California Coastal Commission. Therefore, the City processes its own Coastal Permits, saving time and money for applicants since they do not need to seek separate approval from the California Coastal Commission. Processing time for a CDP is typically 8 to 10 weeks. Note that development pursuant to an approved CDP shall not commence until the CDP is effective. The CDP is not effective until all appeals, including those to the Coastal Commission, have been exhausted. In the event that the Coastal Commission denies the permit or issues a permit on appeal, the CDP approved by the City is void. Action by the Director may be appealed to the Planning Commission. Action by the Planning Commission may be appealed only to the City Council. However, if the project is located in the appealable area of the Coastal Zone, it may be directly appealed to the Coastal Commission within 10 days of the decision.

Single-family subdivisions and condominiums require approval of a subdivision map. Condominium projects with three or more units require approval of a Use Permit. The typical time required is 3 to 5 months for review and approval for projects requiring a Use Permit.

### **Multifamily Development**

Multifamily projects in the mixed-use zones (CL, CNE, and CD) are currently permitted subject to a Use Permit. The typical time required is 3 to 5 months for review and approval for projects requiring a Use Permit. However, **Program 18** of the Housing Element will provide a streamlined approval process for qualifying projects in the mixed-use zones.

Multifamily projects in the residential zones (RM, RH, and RPD) with five units or fewer are permitted without a discretionary permit (approved by the Director with no public hearing). The typical time required for review and approval of an administrative permit is 8 to 10 weeks. Multifamily developments with six or more units require SDP approval by the Planning Commission. The processing time for an SDP is typically 5 months. Multifamily developments with six or more units that qualify for a density bonus pursuant to State density bonus law shall be eligible for PDP approval by the Director. The typical time required for review and approval of a PDP requiring Director approval is 2 to 5 months.

For development projects, potential delays in processing development applications and plans can increase time and costs considerably. Additionally, discretionary processes create uncertainty in the development process and increase project timelines. **Programs 3, 18, and 25** of the Housing Element aim to remove discretionary requirements in the development process.

**Table 8, Permit Processing Timelines**, provides approximate timelines for typical development approvals within the City.

Table 8. Permit Processing Times	
Action/ Request	Processing Time
Environmental Impact Report	8–12 months
Negative Declaration	6–9 months
General Plan Amendment	8–12 months
Zone Change	8–12 months
Tentative Parcel Map	5 months
Tract Map	5 months
Variance	3–4 months
Use Permits	5 months
Administrative Permit	8–10 weeks
Design Review	No Applicable Design Review in the City
Plan Review	239–250 days
Other Ministerial or Discretionary Permits – Precise Development Plan, Site Development Permit, Coastal Development Permit.	2–5 months
Source: City of Manhattan Beach Planning Department, 2021.	

## 2.5 Development Fees and Improvement Requirements

Fees are charged by the City to cover processing costs and staff time, and also to defray the cost of providing public services and facilities to new developments. By State law, fees cannot exceed costs to the City generated by the activity for which the fee is assessed. Permit processing and impact fees are described below.

### 2.5.1 Permit Processing Fees

For projects that do not require a hearing (e.g., Administrative CDP or PDP), a permit fee of \$1,509 or \$4,077, respectively, is assessed. In cases involving land subdivision, such as a condominium project, a tract map must be approved. Parcel Map fees range from \$1,397, if no public hearing is needed, and up to \$3,546. For a Tract Map, the fee would be \$1,493 if there is also another discretionary application, such as a Use Permit or Variance, and \$4,074 if no discretionary application is requested in conjunction. Condominium projects requiring a Use Permit (two-unit condos are exempt) are assessed a \$8,393 fee.

Development and development impact fees are provided at the end of this appendix in **Exhibit A, City of Manhattan Beach User Fee Schedule**.

### 2.5.2 Impact Fees

In addition to permit processing fees, developments are subject to impact fees to help fund the cost of providing public services and facilities. Water and sewer fees are necessary to ensure that these services will be available to serve new developments. The City’s impact fees include: a school fee (\$4.08 per square-foot of living area), a park fee and public art fee (detailed and discussed below), and a water and sewage fee (fees vary, based on number of fixtures for new construction only). Based on recent projects in the City, water and sewage fees for a single-family home with five bathrooms are approximately

\$4,080 per unit and \$1,225 per unit for multifamily projects. Based on the lower fees associated with multifamily units, this is not considered a constraint to the development of multifamily projects.

For single-family or condo developments, \$1,817 per dwelling unit is assessed for park purposes in accordance with the Quimby Act. Multifamily rental projects are exempt from park fees; therefore, this is not a constraint to the development of affordable, multifamily developments.

In accordance with MBMC Chapter 10.90, the City charges a fee for art in public places. The fee is equal to 1 percent of the building valuation and is not assessed on residential projects of fewer than four units. The City does not charge a traffic impact fee. While these fees are not insubstantial, they constitute only about 2 percent of the value of a typical owner-occupied residence and about 1.5 percent of the total value of a multifamily apartment and are therefore not considered a constraint to development.

**Exhibit A** at the end of this appendix provides a full list of fees that the City requires from their current fee schedule.

**Table 9, Typical Fees for Single-Family and Multifamily Development**, summarizes processing fees and impact fees for typical single-family and multifamily developments in the City. The examples provided in **Table 9** are based on recent single-family and multifamily projects approved in the City, including all plan check, permit, planning and impact fees that are most commonly required for single-family or multifamily projects, which were based on the current fee schedule provided in **Exhibit A**.

<b>Table 9. Typical Fees for Single-Family and Multifamily Development</b>		
<b>Planning/Building Fees</b>	<b>Single-Family*</b>	<b>Multifamily**</b>
<b>Processing Fees</b>		
Parcel Map	N/A	\$1,397
Coastal Development Permit	\$1,509	N/A
Site Development Permit <sup>1</sup>	N/A	\$6,388
Plan Check	\$7,733.55	\$23,297.02
Record Retention Fee	\$191	\$191
<b>Impact Fees</b>		
Quimby/Parkland Fee <sup>2</sup>	N/A	N/A
School District Fees	\$4.08 per square foot (assuming 3,300 square feet) = \$13,464	\$4.08 per square foot (assuming 13,000 net square feet) = \$53,040
Public Art Fees	N/A	1% of project valuation \$35,334.21
Traffic Impact	N/A	N/A
Water and Sewage	\$4,082.85	\$13,479.25 (based on 11 units)
Waste Management	Fee included in plan check fee.	Fee included in plan check fee.
<b>Estimated Total Fees</b>	<b>\$26,980.40</b>	<b>\$97,792.27</b>
Source: City of Manhattan Beach, 2021.		
N/A = not applicable		
* Single-family residence based on a 5-bedroom, 5-bathroom development.		
** Multifamily residence based on an 11-unit development.		
<sup>1</sup> As explained in Section 2.4.1, Precise Development Plan, projects that qualify for a density bonus pursuant to State density bonus law are eligible for a Precise Development Plan. The fee for a Precise Development Plan is \$4,077.		
<sup>2</sup> Quimby fee was not applicable in this example because the units were rental, and no subdivision map was requested.		

### *Fees in Proportion to Total Development Cost Per Unit*

Overall, for a typical single-family project, a developer can expect to pay approximately \$26,980 per unit in total fees (including Plan Check, Permit, Planning, and impact fees). A multifamily project will cost a developer approximately \$8,890 per unit in total fees. The level of fees represents a very small portion of overall development costs in the City, especially given the high land cost. Furthermore, current and future housing activities are primarily focused on recycling of underutilized parcels into higher intensity residential uses.

Based on a recent development cost analysis for multifamily developments in California, provided in **Section 3.1**, Cost of Land and Construction, the average cost to develop a new multifamily unit in California is more than \$480,000 per unit. Based on this average development cost, the combined costs of permits and fees are approximately 1.9 percent of the cost of development.

Based on the median sale price from Realtor.com of \$3,100,000 for single-family homes in the City as of December 2021 and a lack of vacant land in the City, the combined costs of permits and fees are estimated to be less than 1 percent of the cost of development.

On average, a survey from the City's "Report on the Cost of Services (User Fee) Study<sup>3</sup>" completed February 2020, showed that the City's fees are in line with the jurisdictions surveyed. In addition, the City provides opportunities for projects that are eligible for a density bonus pursuant to State density bonus law to be permitted subject to a Precise Development Plan instead of a Site Development Plan. The fee for a Precise Development Plan is less than the fee for a Site Development Plan. Nevertheless, in order to mitigate the overall impact of fees on the feasibility of affordable housing development, the City will consider waiving or reducing fees for projects with lower- and moderate-income units.

### 2.5.3 On- and Off-Site Improvements

The City requires developers to provide on-site and off-site improvements necessary to serve their projects. Such improvements may include water, sewer and other utility extensions, sidewalks, street construction, and traffic control device installation that are reasonably related to the project. All streets, highways, alleys, ways, easements, rights-of-way, and parcels of land offered for dedication shall be developed and improved to the standards of the City. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities, and school sites, consistent with the Subdivision Map Act.

Pursuant to the provisions of Section 66411.1 of the Subdivision Map Act, the City may require dedication of rights-of-way, easements, and construction or reimbursement of reasonable off-site and on-site improvements for the parcels being created. Standards for design and improvement of subdivisions shall be in accordance with the applicable sections of Title 10 of the Zoning Code, the General Plan, and any Specific Plans adopted by the City. Prior to the approval by the City of the final map, the subdivider shall execute and file an agreement with the City specifying the period within which improvement work shall be completed to the satisfaction of the City Engineer, and providing that if the subdivider fails to complete the work within such period, the City may complete the same and recover

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<sup>3</sup> Report on the Cost of Services (User Fee) Study, City of Manhattan Beach, 2020.  
<https://www.manhattanbeach.gov/home/showpublisheddocument/44350/637338561824300000>

the full cost and expense thereof from the subdivider. MBMC Chapter 11.20, Dedications and Improvements, provides the standards and requirements for all final maps.

## 2.6 Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing

Lower-income housing can be accommodated in all zones permitting residential use in Manhattan Beach. These may include ADUs in single-family zones and multifamily housing in the RH zone, and mixed-use or multifamily developments in the CD, CL, and CNE zones. Exclusive residential development is allowed subject to the RH development standards in the CD, CL, and CNE commercial zones. The RH standards allow more building floor area on a given parcel than the commercial development standards, so a strong incentive is created for high-density residential development in these commercial zones.

The following potential constraints were identified in this analysis, and local efforts to mitigate the constraints, as feasible, may include the following:

### Parking Requirements for Multifamily Housing (Section 10.64.030 of the MBMC)

- Two-spaces parking requirement for multifamily residential units, including one enclosed space, and 0.25 space per unit for buildings with 4 or more units. Only 1 enclosed space is required for units with less than 550 square feet of floor area in buildings with less than four units.
  - Two-car parking required for all units, regardless of square footage, in the Coastal Zone.
  - Required dedicated guest parking space for each condominium unit.

While parking is typically perceived as a constraint to development, the provision of parking is needed to satisfy the requirements of the Zoning Code. In addition, the California Coastal Commission has repeatedly expressed the need to preserve public parking for visitor-serving uses, which can sometimes be affected by new development, and a reduction in parking below two parking spaces per dwelling unit could potentially result in impacts on existing public parking. However, parking requirements are most stringent for larger units and least stringent for smaller, more affordable units, including a reduction from two spaces to one space for units with less than 550 square feet of floor space in multifamily residential buildings with less than four units and a minimal requirement of 0.25 guest spaces per unit in multifamily residential buildings for buildings with 4 or more units.

To mitigate potential constraints to the development of housing affordable to lower- or moderate-income households, lower-income students, senior citizens housing development, as defined in Sections 51.3 and 51.12 of the Civil Code, or those with special needs, such as transitional foster youth, veterans with a disability, or people experiencing homelessness, the City provides reduced parking requirements for housing developments that qualify for a density bonus pursuant to State density bonus law. Consistent with AB 2345 (2020), the City does not require a parking ratio that exceeds the following for a development that receives a density bonus:

- Studio / 1-bedroom Units – 1 space
- 2 Bedroom / 3 Bedroom Units – 1.5 spaces
- 4 or More Bedroom Units – 2.5 spaces

As of December 2021, two multifamily projects with affordable units in the City that qualify for a density bonus under State law, which are expected to be completed during the planning period, are utilizing the reduced parking ratios. See additional details in **Section 5, Planned, Approved, and Prospective Projects, of Appendix E, Sites Analysis and Inventory**.

While the City implements these parking ratios in accordance with current State density bonus law, as part of **Program 11** of the Housing Element, the City commits to amending Section 10.94.040 - Affordable Housing Concessions and Incentives, of the MBMC to ensure the reduced parking ratios in the Zoning Code are consistent with AB 2345 (2020), so that the reduced parking ratios available are clear to any applicant who qualifies for a density bonus.

In addition to the reduced parking ratios currently offered, the City will conduct a parking study as part of **Program 22**, Parking Reductions, of the Housing Element to identify opportunities for additional parking reductions for residential multifamily housing outside of the Coastal Zone, such as reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities.

#### Use Permit Requirements for Multifamily Housing

- Use Permit required for developments with three or more condominium units in accordance with Section 10.12.020 (B) of the MBMC.
- Use Permit required for multifamily housing in the CL, CD, and CNE zones in accordance with Chapter 10.16 of the MBMC.

The City will aim to mitigate this potential constraint through **Program 18** of the Housing Element. Multifamily housing developments in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) Districts are currently permitted through approval of a Conditional Use Permit. To further incentivize affordable housing in the City and remove barriers to development, the City will remove the discretionary requirements for multifamily housing in the CL, CD, and CNE zones meeting the minimum requirements for a density bonus. Through implementation of **Program 18**, the City will review and amend the Zoning Code to permit residential uses in the CL, CD, and CNE zones without requiring approval of a Conditional Use Permit, and all projects that use the State density bonus will be eligible for streamlined approvals.

#### Open Space Requirements

- As required by Section 10.12.030 (M)(1) of the MBMC, open space (private and shared) in residential zones (RS, RM, and RH) shall equal 15 percent of unit size, with a minimum of 220 square feet of open space per unit.

While overly generous open space requirements may be perceived as a constraint to development, the City offers flexibility to mitigate potential constraints to development by including “outdoor or unenclosed area on the ground, or on a balcony, deck, porch or terrace designed and accessible for outdoor living, recreation, pedestrian access or landscaping” in the definition for usable open space. In addition, the City offers reduced minimum outdoor and/or private outdoor living area requirements for affordable housing projects that qualify for a State Density Bonus.

### Minimum Lot Standards and Setbacks

Minimum lot standards and setbacks are typical of many areas of Southern California, and the 3-foot minimum side yard setback is the minimum required to maintain public safety and emergency access. A 5-foot front yard setback in Area Districts III and IV is relatively conservative, compared to the 20-foot minimum often required in inland areas and in other suburban areas. The minimum required area per dwelling unit allows for a range of densities, up to 51 dwelling units per acre, as shown in Table 6. In addition, the City offers reduced minimum lot sizes and/or dimensions and reduced minimum building setbacks and building separation requirements for affordable housing projects that qualify for a State Density Bonus.

Furthermore, the City does not generally prescribe a minimum floor area per dwelling unit. Units as small as 500 square feet currently exist in the City, primarily in El Porto and the northwest area of the City. In accordance with Zoning Code Section 10.12.050, a minimum floor area of 525 square feet per dwelling is required for units developed as part of a senior housing complex. As such, these are not considered a constraint to development.

### Citywide Election

In accordance with MBMC Section 10.12.030, certain amendments to residential development standards in the RS, RM, and RH zones must be submitted to voters for approval. This provision applies to amending the following specific development regulations for the RS, RM, and RH residential zones standards: to increase the standards for the maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit. Based on the city-wide election requirements for amendments to the specific development regulations of the RS, RM, and RH zones, increasing the current densities higher than the maximum 51 units per acre permitted in those residential zones would be difficult to achieve due to the need for parking and the desire of the residents for adequate living space. This limit is consistent with the repeatedly stated desires of the citizenry to maintain a small-scale community and the capacity of area roadways to serve development. However, this does not preclude the City from implementing incentives, concessions, and waivers, such as reduced parking requirements or reduced setback and minimum square footage requirements under State Density Bonus law for affordable housing as the granting of a density bonus shall not, in and of itself, be interpreted to require a general plan amendment, zoning change, or other discretionary approval.

As such, the city-wide election requirements under MBMC Section 10.12.030 are not considered a constraint to the development of affordable housing and do not restrict the ability of the City to provide flexibility for development under State Density Bonus Law or opportunities for the development of affordable housing.

Most recently, two multifamily projects in the project pipeline that include very low-income units and qualify for a density bonus under State law were approved by the City. The mixed-income projects, which are expected to be completed during the planning period, are utilizing density bonus and/or lot consolidation bonus incentives offered by the City to achieve densities that are above and beyond the maximum densities in the underlying zones. See additional details **in Section 5, Planned, Approved, and Prospective Projects, of Appendix E.** Through implementation of **Program 2, Adequate Sites**, of the Housing Element, the City will establish an overlay district that encompasses a minimum of 20.3 acres of

sites in the General Commercial (CG) and Planned Development (PD) Districts. In accordance with current State housing law requirements, the sites will allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project. This will create the opportunity for future residential development to occur outside of the residential zones. The 20.3 acres of sites will be selected from **Table 15, Potential Underutilized Sites for Overlay, of Appendix E, Sites Analysis and Inventory**. The potential sites identified for the overlay will be located outside of the residential zones where the city-wide election requirements apply.

In addition, through implementation of **Program 18** of the Housing Element, the City will adopt development standards for multifamily residential and mixed-use projects in the three existing mixed-use commercial zones (CL, CD, and CNE)., leaving more flexibility for appropriate residential and mixed-use development standards in those zones. Under Chapter 10.16, Commercial Districts, of the MBMC, portions of a building intended for residential use in a mixed-use project or purely residential developments in mixed-use zones are currently subject to the High-Density Residential District residential standards in Chapter 10.12, Residential Districts, of the MBMC. To minimize constraints to the development of affordable housing, including housing for extremely low- and very low-income households, the City will adopt development standards for multifamily residential and mixed-use projects in the three commercial mixed-use zones (CL, CD, and CNE) instead of deferring to the High-Density Residential standards, which are subject to voter approval for certain amendments to residential development standards. The City will ensure that the adopted standards for residential and mixed-use projects facilitate development at densities appropriate to accommodate lower-income housing and that they do not reduce the intensity of land use<sup>4</sup> or reduce the site's residential development capacity, consistent with the Housing Crisis Act of 2019.

In addition to the previously mentioned efforts to mitigate potential constraints, the City offers streamlined approvals and multifamily permitting processes, and will aim to further remove discretionary approval processes through several programs in the Housing Element. Furthermore, the City supports the production of affordable housing through land use incentives, such as the State density bonus law and lot consolidation incentives above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus; mixed-use designations that offer higher allowable densities, which can aid in reducing costs for affordable housing; and aiming to maintain residential neighborhoods and protect residential neighborhoods from the intrusion of incompatible and character-changing uses by prohibiting short-term rentals in residential zones.

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<sup>4</sup> In accordance with State law, "reducing the intensity of land use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site's residential development capacity.



### 3 Non-Governmental Market Constraints

This section identifies those non-governmental market factors and other financial factors that may affect the cost of new housing. There is little land in the City available for new construction. Also, in most instances, parcels are divided into small lots or have irregular-shaped lots that make residential development difficult. However, the City can support the production of affordable housing through land use incentives, such as the State density bonus law, streamlined approvals, and mixed-use designations that offer higher allowable densities, which can aid in reducing costs for affordable housing. Numerous programs in the Housing Element directly or indirectly remove or mitigate nongovernmental constraints by streamlining permitting processes, waiving fees, providing technical support, increasing certainty in the development process, and increasing opportunities for development sites through rezoning, such as through **Program 3, Affordable Housing Streamlining**, **Program 16, Lot Consolidation Incentive**, **Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts**, and **Program 20, Objective Design Standards**.

In addition, **Program 9, Countywide Affordable Home Ownership Program**, supports lower-income households looking to purchase a home through down payment and closing costs assistance, **Program 10, Countywide Affordable Rental Housing Development**, provides financial and technical assistance to acquire sites, develop affordable rental housing, and acquire and rehabilitate affordable rental housing, **Program 29, Support for Those Experiencing Homelessness**, aims to provide support through outreach and education, coordination of regional efforts to address homelessness, and housing navigation services, and **Program 30, Surplus Lands**, prioritizes local surplus lands available for housing development affordable to lower-income households, therefore connecting affordable housing developers to local surplus land.

#### 3.1 Cost of Land and Construction

According to a 2014 study commissioned by California’s four State-level housing agencies—the California Tax Credit Allocation Committee, California Debt Limit Allocation Committee, Department of Housing and Community Development, and California Housing Finance Agency—local and development-specific factors such as the type of housing (e.g., family units, special needs housing, SRO), land availability and affordability, community opposition, materials costs, and local building requirements (e.g., parking, design, density, quality and durability) all influence development costs for affordable housing. Land, construction, and financing costs represent the most significant non-governmental constraints in the production of housing for most income groups in the City.

Land costs within the City are increasing due to the built-out nature of the City, limited availability of land, and coastal proximity. Land is a major part of total development costs, especially in denser and more desirable areas.<sup>5</sup> Land costs for residential developments are often passed along to the consumer in the form of rent prices or home sale prices. While there is little to no availability of raw, vacant land in the City, based on the median listing price of 203 homes for sale in October 2021,<sup>6</sup> the average cost for

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<sup>5</sup> UC Riverside School of Business, 2020. Demystifying the High Cost of Multifamily Housing Construction in Southern California. [https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR\\_CEFD\\_Multifamily\\_Housing\\_White-Paper\\_3\\_2020.pdf](https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR_CEFD_Multifamily_Housing_White-Paper_3_2020.pdf).

<sup>6</sup> <https://www.homes.com/manhattan-beach-ca/90266/what-is-my-home-worth/>.

land of developed properties is between \$300 and \$350 per square foot (\$1,210 per net square feet of the developed homes), with a median listing price of \$2,511,200.

Purchasing land accounts for roughly 10 percent to 20 percent of total development costs for a typical multifamily project. Land in high-resource areas with access to infrastructure, desirable land uses, and other community amenities costs more due to a higher demand. Although affordable housing developers typically work with local governments to develop affordable housing, there are limited resources available for the construction of affordable housing, making it hard to develop in areas with record high land costs. To supplement the shortage of funding and tax credits, it is necessary for the City to offer incentives to market-rate developers to provide affordable housing units. Between 2016 and 2019, the costs to develop a new affordable unit under the Low-Income Housing Tax Credit (LIHTC) program have increased from \$425,000 per unit to more than \$480,000 per unit.<sup>7</sup> This is reflected in recent statistics that indicate that the Southern California area is now the most expensive housing market in the country. However, the City will continue offering incentives and streamlined permitting procedures for developers in exchange for affordable housing units, such as through implementation of **Programs 3, 11, and 18** of the Housing Element.

Construction costs include both “hard” and “soft” costs. Hard costs, such as labor and materials, typically account for 50 percent to 70 percent of construction costs, and soft costs, such as architectural and engineering services, development fees, construction financing, insurance, and permitting, typically average around 20 percent to 30 percent of total costs, although they can be higher for subsidized affordable housing or complex projects. A significant cost factor associated with residential building involves the cost for building materials. These costs can account for more than half of the total construction cost. According to the latest Building Valuation Data release in 2019, the national average for development costs per square foot for apartments and single-family homes in 2019 were as follows:

- Type I or II, Multifamily: \$148.82 to \$168.94 per square foot
- Type V Wood Frame, Multifamily: \$113.88 to \$118.57 per square foot
- Type V Wood Frame, One- and Two-Family Dwelling: \$123.68 to \$131.34 per square foot

The costs of design, regulation, and operations do not vary much by building size, so larger buildings allow developers to spread these fixed costs over more dense developments. In general, construction costs can be lowered by increasing the number of units in a development, reflecting economies of scale in multifamily construction, until the scale of the project requires a different construction type that commands a higher per-square-foot cost. This is because construction costs change substantially depending on the building type. For example, high-rise concrete apartments might cost \$75 or more per square foot than a six-story wood-frame structure on a concrete podium. Apartments four stories or fewer can typically achieve an economy of scale, provided that the building has typical amenities and no structured parking. However, for smaller-scale and affordable or middle-income housing, onerous regulations can impose a significant burden. Because of the jump in construction costs, developers may not build to the maximum height or floor-to-area ratio. Mobile homes are significantly less expensive, as are precision- or factory-built housing products.

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<sup>7</sup> Terner Center for Housing Innovation, 2020. The Costs of Affordable Housing Production: Insights from California’s 9% Low-Income Housing Tax Credit Program. [https://ternercenter.berkeley.edu/wp-content/uploads/pdfs/LIHTC\\_Construction\\_Costs\\_March\\_2020.pdf](https://ternercenter.berkeley.edu/wp-content/uploads/pdfs/LIHTC_Construction_Costs_March_2020.pdf)

Labor costs also greatly contribute to construction costs. They are generally two to three times the cost of construction materials. A 2019 study for Smart Cities Preval found that California lost about 200,000 construction workers since 2006. Many lost their job during the recession and found work in other industries. Before the COVID-19 pandemic, the industry already faced this historical shortage of skilled labor, and the labor gaps might get even larger, especially in states like California. California's shortage of needed construction workers, combined with rising prices in construction materials, also contributes to driving up construction costs.

The COVID-19 pandemic resulted in delays and shortages for some construction materials, and extended timelines and costs for many developments under construction. Construction delays only further constrain California's housing shortage, exacerbating the current supply-and-demand imbalance across much of the State as the housing market continues to see home prices accelerate with a record low supply of homes for sale.

### 3.2 Availability of Financing

Availability of financing for the construction of housing and for home ownership loans can greatly impact the housing market. While the City has been unable to identify any factors subject to local control related to land, fees, labor, materials, and/or financing that would significantly reduce the cost for housing, the City will continue offering incentives and streamlined processes, such as through implementation of **Programs 3, 18, and 25** of the Housing Element.

#### Construction Financing

Construction loans are short-term, interim loans used for new home construction. Construction loans can be used to cover the cost of land, contractor labor, building materials, permits, and more. With a construction loan, the lender is unable to claim the residence as collateral and views these types of loans as riskier. Developers must usually supply at least 25 percent of the project value upfront, and perhaps more if the total cost is more than 75 percent of the estimated value of the project. Although there is no hard threshold for how much required upfront equity is too much before a residential project would be infeasible, the higher the proportion of equity required, the more unlikely that a developer would proceed with the project. Construction loans must also be paid off when the loan matures, typically 1 year or less. This can be done through the conversion of the loan to mortgage financing or by obtaining a mortgage to secure permanent financing to pay off the loan.

Although the City does not currently have any local ordinances that directly impact the cost of development, financing for residential projects, particularly affordable housing, is quite complex. The level of subsidies required for affordable housing projects necessitates the pooling of multiple funding sources. The County of Los Angeles offers several funding programs for affordable housing developers meeting eligibility requirements. The Los Angeles County Development Authority publicly releases its Notice of Funding Availability (NOFA), twice annually, with a focus on funding the development or rehabilitation of low-income rental housing. Funding sources include Measure H, No Place Like Home, and Measure JJJ. Additionally, the City supports the production of affordable housing through incentives such as the State density bonus law and land use designations that offer higher allowable densities, which can aid in reducing costs for affordable housing.

### Mortgage Financing

Current (2021) interest rates for home loans are between 2 percent and 3 percent, depending on the terms and the down payment. Mortgage rates have been at a record low in recent months due to the COVID-19 pandemic, and recent policy statements from the Federal Reserve indicate that these rates will stay low for the foreseeable future. Although recent economic conditions have seen interest rates remain low, housing prices have skyrocketed, and buying a house or refinancing a mortgage is becoming less attainable for many households as banks raise requirements, such as minimum credit score. Loan applicants with short credit history, lower incomes, self-employment incomes, or other unusual circumstances have had trouble qualifying for loans or are charged higher rates.

Based on the median sale price of \$2,511,200 for homes in the City, and assuming a 10 percent down payment of \$251,120 and a 3.2 percent, 30-year fixed mortgage, monthly principle and interest would be approximately \$11,493. The down payment required to purchase a home combined with a high monthly payment represent major obstacles for most families.

### 3.3 Requests for Housing Developments at Reduced Densities

State law requires the Housing Element to include an analysis of requests to develop housing at densities below those anticipated in the Sites Inventory. Programs in the Housing Element include measures to streamline residential development projects, which limits opportunities for public opposition to result in reduced densities.

The City works closely with developers throughout the development process to ensure that there is clear understanding related to what they are allowed to build, and the corresponding maximum densities permitted. Furthermore, City staff work with developers to make sure they understand what their options are for developing affordable housing and the incentives or flexibility they have to make those options work in the City, and to evaluate options for how to get there.

### 3.4 Length of Time Between Project Approval and Applications for Building Permits

State law requires an analysis of the length of time between receiving approval for housing development and submittal of an application for a building permit. On average, the time is 3 to 4 months for the approval for a housing development after submittal of a completed application and plans for building permits that comply with all applicable regulations.

## 4 Environmental Constraints

### 4.1 Environmental Review

Environmental review is required for all discretionary development projects under the California Environmental Quality Act (CEQA). Due to their construction in a built-out environment, most projects in the City are either Categorical Exempt or require only an Initial Study and Negative Declaration. Developments that have the potential of creating significant impacts that cannot be mitigated require the preparation of an Environmental Impact Report. Most residential projects require a Negative Declaration that takes an additional 3 to 4 weeks to complete. ADUs are a ministerial process (non-discretionary) and, therefore, qualify for statutory exemption from CEQA. As a result, State-mandated environmental review does not pose a significant constraint to housing development.

### 4.2 Geologic and Seismic Hazards

Southern California lies on the edge of the Pacific Plate, one of the many puzzle-like pieces that fit together forming the Earth's crust. The continuous shifting and pushing of these crustal plates create ruptures and weaknesses termed "faults." Movement along a fault releases stored energy and tension, thereby producing earthquakes.

Although no surface faults are known to pass through the City, the City does lie above the Compton Thrust Fault. This type of fault does not rupture all the way up to the surface, so there is no evidence of it on the ground; it is "buried" under the uppermost layers of rock in the crust. In addition, several regional potentially active faults nearby can produce enough shaking to significantly damage structures and cause loss of life.

The level of damage in the City resulting from an earthquake will depend on the magnitude of the event, the epicenter distance from the City, the response of geologic materials, and the strength and construction quality of structures. While ground shaking itself can cause damage, related effects such as liquefaction, landslides, and tsunami inundation are also of concern.

### 4.3 Flooding

No portions of the City lie within any federally designated flood zone. Localized flooding represents the only flood concern. Historically, localized flooding has resulted in damaged properties. Flooding can occur in low topographic areas or where storm drains are unable to accommodate peak flows during a storm event. Generally, localized flooding dissipates quickly after heavy rain ceases. The topographical features in the City, local drainage infrastructure, and proximity to the ocean reduce any serious threat of storm flooding within the City. City engineering records indicate that localized flooding of consequence occurs roughly every 20 years. This has been an issue that the Public Works Department has been addressing for a number of years, particularly in the Tree Section. There are areas of the City that regularly flood during heavy storm events.

## 4.4 Other Environmental Constraints

### 4.4.1 Hazardous Materials

Industrial uses in the adjacent City of El Segundo may have an impact on the City's residents. The Chevron Oil Refinery, El Segundo Generation Station, and other industrial uses occupy properties just north of the City and are adjacent to many homes. Northrop Grumman (formerly TRW Inc. – Space and Electronics), with locations in Redondo Beach and Manhattan Beach, handles hazardous materials. Fire and/or spills of chemicals and petroleum can release hazardous materials into the air that may warrant an evacuation of surrounding areas. The Hyperion Water Reclamation Plant is the City of Los Angeles's oldest and largest wastewater treatment facility and is located 1.5 miles north of the City of Manhattan Beach. The plant has been operating since 1894. The plant has been expanded and improved numerous times over the last 100+ years.

A report by the California Energy Commission identified three major types of hazards associated with the El Segundo Power (Generation Station) Redevelopment Project. These include the accidental release of ammonia, hydrazine vapor mishandling, fire, and explosion from natural gas. Mitigation measures have been introduced to reduce the threat of public exposures to these hazards, as well as alternative use of chemicals that are less hazardous.

The Manhattan Beach Fire Department Fire Prevention Division participates in a local hazardous materials program through a joint agreement with the Los Angeles County Fire Department. Division responsibilities include cleanup of spills, leaks, and illegal dumping, and monitoring hazardous materials within businesses in the City.

### 4.4.2 Fire Risk

Urban fires represent the sole fire threat in the City. The City's narrow streets and alleys, steep topography, densely developed housing, and extensive on-street parking can limit the access of fire trucks and other emergency vehicles, particularly longer vehicles. Several roadways in downtown and North End/El Porto cannot accommodate longer wheelbase fire engines. The Fire Department has identified all impassible roadways and uses designated alternative routes to quickly gain access to all properties within the City. The Fire Department also regularly practices maneuvering on narrow streets with large vehicles to analyze access limitations and develop routing alternatives in the event of responding to an emergency within an identified issue area.

### 4.4.3 Liquefaction

Liquefaction is a phenomenon in which the stiffness of a soil is reduced when ground shaking causes water-saturated soil to become fluid and lose its strength. Earthquake-induced liquefaction and related phenomena can cause significant damage, creating problems with buildings, buried pipes, and tanks. Liquefaction hazard areas in the City have been identified along the coast, particularly the sandy areas of the beach. Only lifeguard towers and a partial portion of the Pier are located in liquefaction areas.

### 4.4.4 Landslides

The strong ground motions that occur during earthquakes are capable of inducing landslides, generally where unstable soil conditions already exist. Prior to the 1920s, when beach sand was hauled away to

facilitate development, the City was known to have significantly large sand dunes, ranging from 50 to 70 feet in height. Past indication of these sand dunes is evidenced in the North End of the City, particularly at Sand Dune Park. The North End is the only area of the City where landslides hazards and unstable soil have been recognized.

#### 4.4.5 Coastal Zone

Section 65590 of the California State Government Code requires the inclusion of low- or moderate-income housing in new residential development in the Coastal Zone where feasible. Due to land costs, it would not be feasible to provide very low-, low-, or moderate-income housing on single-family or small multifamily lots within the City's Coastal Zone without very large subsidies. There are no large vacant lots available for housing complexes that would accommodate large numbers of dwelling units within the Coastal Zone. However, significant development opportunities exist within the Coastal Zone on underutilized commercial properties in the CD, CNE, and CL zones.

The City has a certified LCP. The LCP was certified by the California Coastal Commission in 1994 and, therefore, the City is able to issue its own Coastal Permits. The LCP addresses three primary issue areas: public access, locating and planning for new development, and the preservation of marine-related resources. The LCP includes a number of policies that affect the ability to develop new housing within the coastal areas of the City. These include policies related to the preservation of beach access, the provision of adequate parking (including requiring adequate off-street parking to be provided in new residential development), and controlling the types and densities of residential development within the Coastal Zone. Those coastal policies related to residential development within the Coastal Zone include the following:

1. Policy II.B.1: Maintain building scale in Coastal Zone residential neighborhoods consistent with Chapter 2 of the Implementation Plan.
2. Policy II.B.2: Maintain residential building bulk control established by development standards in Chapter 2 of the Implementation Plan.
3. Policy II.B.3: Maintain Coastal Zone residential height limit not to exceed 30 feet as required by Sections A.04.030 and A.60.050 of Chapter 2 of the Implementation Plan.
4. Policy II.B.4: The beach shall be preserved for public beach recreation. No permanent structures, with the exception of bikeways, walkways, and restrooms, shall be permitted on the beach.

At the same time, the City seeks to process permits in the Coastal Zone as efficiently as possible. As noted above, certification of the City's LCP allows the City to process Coastal Permits locally, saving the time and expense of a separate Coastal Commission approval.

### 4.5 Infrastructure Capacity

Residential development during the 6th Cycle will primarily occur on properties that have previously been developed. As such, existing infrastructure, including water, sewer, and dry utilities, including electricity, natural gas, cable, and telephone, are available at all sites identified in the Sites Inventory (see **Appendix E**). The City's utilities receive necessary upgrades and improvements based on future growth and development anticipated by the General Plan.

The City is the direct provider of water, sewer, and storm drain maintenance.

### 4.5.1 Storm Drain Facilities

In regards to storm drain facilities, the goals and policies of the Infrastructure Element of the General Plan aim to ensure adequate capacity to collect and carry stormwater and thereby avoid flooding and reduce pollutant loads in stormwater as part of regional efforts to improve water quality in surface waters. Stormwater runoff flows directly into the City's storm drain system via street gutters and other inlets, and this flow in turn discharges into the County of Los Angeles flood control network, which ultimately drains into the Pacific Ocean. The Los Angeles County Department of Public Works maintains the regional storm drain system, including two major pump plants (Polliwog Pond and Johnson Street) in the City.

With regard to capacity, the established system is adequate to handle most runoff. However, during unusually heavy storm events, the system can become overwhelmed, with flooding occurring in the areas shown in Figure CS-3 of the City's General Plan Safety Element. The City has assessed the cost to correct isolated deficiencies, with the determination that significant investment will be required to address the issue. The main deficiency occurs in the County of Los Angeles–owned trunk line that collects flow from more than 50 percent of the City and empties at the beach at 28th Street. Rough estimates indicate that at least \$20 million would be needed to add necessary capacity to eliminate flooding in certain areas.

### 4.5.2 Water Supply/Service

The City obtains water from three sources: (1) Metropolitan Water District treated surface water from Northern California and the Colorado River, which is provided to the City by the West Basin Municipal Water District and represents over 80 percent of the local water supply; (2) groundwater extracted by City-owned and operated wells; and (3) reclaimed water supplied for landscape irrigation from the West Basin Municipal Water District. The City owns the right to pump 64,468 acre-feet per year of groundwater from the West Coast Basin. Imported water flows to the City via a 45-inch Metropolitan Water District line in Manhattan Beach Boulevard.

The City's water system consists of pump stations, storage reservoirs, an elevated storage tank, water supply wells, a settling basin, and approximately 112 miles of distribution pipelines. In addition to these facilities, the City provides access to reclaimed water supplies via a major pipeline in Marine Avenue. Reclaimed water can be used for landscape irrigation and some industrial uses, and can reduce demand on potable water supplies.

Given that Land Use Policy (Figure LU-3 in the City's General Plan Land Use Element) accommodates a very modest level of growth in the City, these facilities were not expected to require any substantial expansion to meet long-term needs. The City plans to focus efforts on maintenance and replacement as needed.

The City's 2010 Master Plan identified 10 major projects related to water supply to improve the existing system and provide for any future growth. In order of priority, the projects are replacement of Peck Reservoir; replacement of the Block 35 Ground Level Reservoir; replacement of the Larsson Pump Station; installation of a new solid state type control system at the 2nd Street Booster Pump Station; installation of seismic vibration isolators at the 2nd Street Booster Pump Station; construction of a new well and associated discharge pipe; installation of a new well collection line from Well 11A to Block 35; installation of new fire hydrants; and an annual pipe replacement program.



A project to replace the Peck Reservoir is currently in process (2021), as this was identified as a top priority in the City's 2010 Water Master Plan.

#### 4.5.3 Sewer

The City owns, operates, and maintains the local wastewater collection and pumping system. The City's owned and operated sewer collection system is made up of a network of gravity sewers, pump stations, and force mains. The gravity system consists of approximately 81.6 miles of pipe and 2,086 manholes and clean outs. The system also includes six pump stations and 5,114 feet of associated force mains. Collected effluent is treated at the Joint Water Pollution Control Plant in Carson, operated by the Sanitation Districts of Los Angeles County. The sewer main to Carson tunnels under Sand Dune Park and connects the east and west portions of the City. The collection system appears to serve the City adequately. The City has undertaken a complete inspection of the entire system via video, and priorities for line replacement have been established to ensure long-term reliability.

In 2017, the City updated its Sewer System Management Plan and presented it to the State Water Resources Control Board. The Sewer System Management Plan identifies goals the City has set for the management, operation, and maintenance of the sewer system. Sewer upgrade projects, as outlined in the FY2022–2026 Capital Improvement Plan, include rehabilitation or replacement of gravity sewer mains annually throughout the City; reconstruction/modification of the Poinsettia Sewage Lift Station and installation of a second force main; improvement of the Pacific Avenue Sewage Lift Station and installation of a second force main; improvement of the Voorhees Sewage Lift Station and installation of a second force main; and improvement of the Palm Lift Station and construction of emergency storage.

#### 4.5.4 Electric Power and Natural Gas

Southern California Edison provides electric service to residents and businesses in the City. The City's Capital Improvement Program outlines funding to remove the high-voltage power poles on Rosecrans Avenue to improve the corridor visually. The City is pursuing implementation, with Southern California Edison, on a number of undergrounding projects in residential areas. The projects will be financed through assessment districts.

Southern California Gas Company provides natural gas service to residents and businesses in the City. There are no upgrades to natural gas services that the City is aware of at this time.

## 5 Quantified Objectives

Based on the City’s needs, resources, constraints, and programs outlined in the Housing Element, **Table 10, Summary of Quantified Objectives for 6th Cycle (2021–2029)**, summarizes the quantifiable objectives for the 6th Cycle. The quantified objectives estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period. The quantified objectives do not represent a ceiling on development, but rather set a target goal for the City to achieve.

<b>Table 10. Summary of Quantified Objectives for 6th Cycle (2021–2029)</b>				
<b>Income Category</b>	<b>6th Cycle RHNA</b>	<b>New Construction</b>	<b>Rehabilitation</b>	<b>Conservation/ Preservation</b>
Extremely Low	161	161	0	0
Very Low	161	140	0	21
Low	165	136	8	21
Moderate	155	105	8	42
Above Moderate	132	132	0	0
<b>TOTALS</b>	<b>774</b>	<b>674</b>	<b>16</b>	<b>84</b>

**Exhibit A. City of Manhattan Beach Planning and Zoning Fee Schedule**

# **EXHIBIT A - City of Manhattan Beach User Fee Schedule**

**Community Development Department Fees.....Page 2**

**Non Community Development Fees.....Page 20**

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
<b>PLANNING FEES</b>					
		<b>Use Permits:</b>			
20-085	Use Permit	Review an application for use permit for conformity with code requirements.	Use Permit	\$ 6,396.00	\$ 8,393.00
		<b>Master Use Permits:</b>			
20-086		Review an application for a master use permit for conformity with code requirements.	Master	\$ 9,875.00	\$ 10,908.00
20-087		Review an application to amend a master use permit for conformity with code requirements	Amendment	\$ 5,126.00	\$ 7,414.00
20-088		Review an application for a conversion to a master use permit from a use permit for conformity with code requirements.	Conversion	\$ 4,704.00	\$ 5,035.00
20-089	Planned Development	Review an application for a Commercial Planned Development for conformity with code requirements.	Commercial	\$ 9,342.00	\$ 7,864.00
20-090		Review an application for a Residential Planned Development for conformity with code requirements.	Residential	\$ 6,244.00	\$ 8,393.00
20-091	Planned Development (continued)	Review an application for a Sr. Citizen Residential Planned Development for conformity with code requirements.	Sr. Citizen Residential	\$ 6,244.00	\$ 8,393.00
20-092	Coastal Development Permit	Review an application for a coastal development that involves a public hearing in an appealable area or an administrative permit, or a request to transfer an ownership of a coastal development permit.	Administrative	\$ 1,324.00	\$ 1,509.00
20-093			Hearing	\$ 4,871.00	\$ 3,948.00
20-094			Hearing w / another discretionary application	\$ 2,142.00	\$ 1,940.00
20-095			Transfer	\$ 165.00	\$ 155.00
20-096	Variance	Review an application for a variance from the terms of the Zoning Code.		\$ 6,184.00	\$ 8,421.00

NOTE: ALL OTHER FEES NOT DEFINED IN THIS TABLE ARE BASED ON FULLY BURDENED RATES AND ARE EXECUTED AT THE DISCRETION OF THE CITY MANAGER

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-097	Minor Exception	Review a proposed minor exception from the terms of the Zoning Code.	Without Notice - Small Project or Revision	\$ 1,477.00	\$ 353.00
20-098			With Notice or larger project or 3,000+ sq. ft.	\$ 1,985.00	\$ 1,575.00
20-099	Sign Exception	Review a proposed sign exception from the terms of the Zoning Code.		\$ 4,082.00	\$ 3,125.00
20-100	Tentative Parcel Map Review	Reviewing a tentative parcel (4 or fewer lots / units) map to identify any special conditions and determine extent to which it complies with appropriate code and State Subdivision Map Act Requirements.	Administrative	\$ 1,333.00	\$ 1,397.00
20-101			Hearing	\$ 3,622.00	\$ 3,546.00
20-102			Hearing w / another discretionary application	\$ 1,402.00	\$ 1,301.00
20-103	Tentative Tract Map Review	Reviewing a tentative tract map (more than 4 lots or units) to identify any special conditions and determine extent to which it complies with appropriate code and State Subdivision Map Act Requirements.	Hearing	\$ 4,134.00	\$ 4,074.00
20-104			Hearing w / another discretionary application	\$ 1,338.00	\$ 1,493.00
20-105	Lot Line Adjustment	Reviewing the proposed change to the property boundary into the same or fewer lots and issuing a certificate of compliance.		\$ 1,153.00	\$ 1,184.00
20-106	Certificate of Compliance	Review of records in order to determine compliance with the Subdivision Map Act.		\$ 1,653.00	\$ 1,652.00
20-107	Development Permit Amendment	Review an application for amending a Use Permit, Variance, Development Agreement and Residential, Commercial, or Senior Citizen Residential Planned Development.		\$ 4,949.00	\$ 5,035.00
20-108	Telecomm. Antenna Permit	Review an application for a Telecommunications Antenna Permit in order to ensure that it conforms to code requirements.	New - Private Property (Macro, Tower or other that is NOT a Small Cell or eligible facility)	\$ 2,746.00	\$ 2,428.00
20-109			Amendment - Private property (Macro, Tower or other that is NOT a Small Cell or eligible facility)	\$ 1,172.00	\$ 1,706.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-110	Telecomm. Antenna Permit	Review an application for a Telecommunications Antenna Permit in order to ensure that it conforms to code requirements.	New in Public R-O-W (Tower or similar)	\$ 3,118.00	\$ 2,951.00
20-111			New or Ammendment to a Small Cell or eligible facility (Public Property, Private Property, and R-O-W)	\$ 1,358.00	\$ 2,307.00
20-112			New or Ammendment antenna on City property	\$ -	\$ 2,307.00
20-113			Appeal of Directors decision for public ROW to Hearing officer	Hearing Officer Rate	Hearing Officer Rate
20-114			Add on fee for all Telecom Permits as needed for consultants	Actual Cost	Actual Cost
20-115	Small Day Care Center Permit	Review of a small day care center to ensure that it complies with code requirements		\$ 329.00	\$ 334.00
20-116	Large Family Day Care Home Permit	Review an application for a permit for a large family day care home to ensure that it complies with code requirements, as well as inspecting the site.		\$ 1,225.00	\$ 1,224.00
20-117	Group Entertainment Permit	Review an initial application for Class I (on-going) permit or a Class II (one-occasion) which allows for entertainment either incidental with the business being conducted or for which admission is being charged.	Class I	\$ 607.00	\$ 612.00
20-118			Class II	\$ 662.00	\$ 670.00
20-119		Review an application for renewing an ongoing Class I Group Entertainment Permit.	Renewal	\$ 424.00	\$ 418.00
20-120	Alcohol License Public Determination	Review of a public determination of convenience and necessity of a proposed alcohol license		\$ 1,828.00	\$ 950.00
20-121	Alcohol / Live Music	Add-on to specific development permits with alcohol or live music.		\$ 110.00	\$ 108.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-122	Bodywork (Massage)	Review an application for an owner of bodywork (massage) business for compliance with City codes and standards.	Application - Owner	\$ 399.00	\$ 411.00
20-123		Review an application to change a business location for a bodywork operation.	Business Location Change	\$ 346.00	\$ 358.00
20-124		Review documentation of a bodywork (massage) application which is associated with another special type of business and meets certain criteria.	Exemption	\$ 346.00	\$ 199.00
20-125	Sign Permit	Review an application for a permanent sign for conformity with code requirements.	Single Tenant	\$ 325.00	\$ 361.00
20-126			Multi Tenant	\$ 489.00	\$ 510.00
20-127			Face Change	\$ 129.00	\$ 139.00
20-128		Temporary	Review an application for a temporary sign for conformity with code requirements.	\$ 227.00	\$ 247.00
20-129			<b>**Performance Bond also required.</b>		
20-130	Sign Program	Administrative review of an application for a sign program for conformity with code requirements.		\$ 797.00	\$ 830.00
20-131	Temporary Use Permit	Review an application for an administrative permit for a temporary use permit.	Standard	\$ 787.00	\$ 816.00
20-132			Major	\$ 787.00	\$ 1,193.00
20-133	Home Occupation Permit	Review an application for a home occupation business use for conformity with zoning regulations.		\$ 65.00	\$ 68.00
20-134	Appeals	Process an appeal to the Planning Commission of an administrative decision. <b><i>This fee is set by Council Policy.</i></b>	Appeal to PC - Admin	\$ 500.00	\$ 500.00
20-135		Appeal an administrative decision to the City Council. <b><i>This fee is set by Council Policy.</i></b>	Appeal to CC - Admin	\$ 500.00	\$ 500.00
20-136		Process an appeal to the City Council of the PPIC - related to traffic. <b><i>This fee is set by Council Policy.</i></b>	Appeal to CC - PPIC (Traffic)	\$ 500.00	\$ 500.00



**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-137	Appeals Cont.,	Process an appeal to the City Council of the PPIC - related to encroachment. <i>This fee is set by Council Policy.</i>	Appeal to CC - PPIC (Encroachment)	\$ 500.00	\$ 500.00
20-138		Process an appeal to the City Council of a Planning Commission Decision. <i>This fee is set by Council Policy.</i>	Appeal to CC - PC	\$ 500.00	\$ 500.00
20-139	Continuance	Review of a request by the applicant to continue the review of a development application to a future meeting prior to the meeting.	Standard	\$ 460.00	\$ 455.00
20-140			Extra Meeting	\$ 2,892.00	\$ 1,482.00
20-141	Time Extension Plan Review	Review administratively a request for an extension of time to complete a planning entitlement.	Administrative	\$ 327.00	\$ 334.00
20-142		Review an application for a time extension for completing a planning entitlement based upon the discretion of the Planning Commission.	Discretionary	\$ 2,334.00	\$ 2,332.00
20-143	Encroachment Permit	Review a permit for a right-of-way (permanent) private encroachment.	R-O-W Development	\$ 1,624.00	\$ 1,770.00
20-144		Review a permit for transfer, revision, or minor permanent private encroachment.	Transfer / Revision / Minor	\$ 758.00	\$ 767.00
20-145	City Fence Agreement	Review of a proposed non-standard fence which abuts the public right-of-way		\$ 319.00	\$ 353.00
20-146	New / Change Building Address Process	Processing a request to number or re-number a building lot.	Minor	\$ 339.00	\$ 348.00
20-147			Major	\$ 899.00	\$ 954.00
20-148	Planning Extra Plan Check	An hourly fee for plan checks over the standard number of plan checks within the Planning Dept.		\$ 151.00	\$ 136.00
20-149	Zoning Business Review	Review of a new business for conformance with Zoning Codes.		\$ 68.00	\$ 68.00
20-150	Outdoor Display Permit	Review an application to issue a permit for an outdoor display of merchandise in order to ensure conformity with code requirement.		\$ 160.00	\$ 159.00
20-151	Temporary Encroachment Permit (Sidewalk Dining Permit)	Review an application to issue a permit for a sidewalk dining permit in order to ensure conformity with code requirements.		\$ 283.00	\$ 192.00

NOTE: ALL OTHER FEES NOT DEFINED IN THIS TABLE ARE BASED ON FULLY BURDENED RATES AND ARE EXECUTED AT THE DISCRETION OF THE CITY MANAGER

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-152	Zoning Report	Providing written report on the zoning regulations for a particular property.		\$ 535.00	\$ 553.00
20-153	Zoning Code Interpretation	Reviewing a request for an interpretation of the Municipal Code regarding zoning and issuing a report on it.		\$ 463.00	\$ 466.00
20-154	Final Parcel Map Review	Reviewing final parcel map to determine extent to which it complies with appropriate code requirements. <b>**Map Copy Deposit of \$500</b>		\$ 539.00	\$ 601.00
20-155	Plan Check / Inspection - Landscape & Irrigation	Review an application for landscape and irrigation to conform to code requirements.	SFR 0 - 7,500 Sq. Ft.	\$ 595.00	\$ 503.00
20-156			MFR / Comm. / SFR > 7,500 Sq. Ft.	\$ 1,122.00	\$ 916.00
20-157	Reasonable Accommodation Process	Review a request to receive a reasonable accommodation for disabled persons		\$ -	\$ 343.00
20-158	Precise Development Plan - Affordable Housing	Reviewing a precise development plan specific to affordable housing requirements.		\$ -	\$ 4,077.00
20-159	Site Development Plan	Review a site development plan for Multi-Family Housing developments of 6 or more units.		\$ -	\$ 6,388.00
20-160	Emergency Shelters - PS and IP zones only	Review of emergency shelters for conformance with Zoning Code.		\$ -	\$ 2,583.00
20-161	Mills Act Contract	Contract Maintenance is an ongoing Annual Fee, starting one year after final approval of the Contract and annually thereafter for the life of the Mills Act contract. If done separately from Landmark Designation, then the following fees shall apply. If done the same time as designation - add on fee of \$1000 will apply		\$ -	\$ 7,455.00
20-162	Historic Preservation Designation	Review of applications for historic preservation designation.	Landmark	\$ -	\$ 1,000.00
20-163			Historic District	\$ -	\$ 1,000.00
20-164			Conservation District	\$ -	\$ 1,000.00
20-165			Amendment or Recession	\$ -	\$ 6,618.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-166	Historic Preservation Certificate of Appropriateness	Review of Historic Preservation Certificate of appropriateness.	Administrative	\$ -	\$ 2,146.00
20-167			Commission	\$ -	\$ 8,633.00
20-168			Economic Hardship	\$ -	\$ -
20-169	Noticing Fees	Support associated with conducting noticing on planning applications.	Coastal Permit - 100ft radius	\$ 72.00	\$ 182.00
20-170			Large Family Day Care - 100 ft radius	\$ 72.00	\$ 56.00
20-171			Minor Exception - 300 ft radius	\$ 72.00	\$ 129.00
20-172			Other Permits - 300-500 ft radius	\$ 72.00	\$ 263.00
20-173			Code, General Plan, or Zoning Amendments	\$ 72.00	\$ 588.00
<b>TRAFFIC ENGINEERING</b>					
20-174	Development (Parking) Traffic Review	Review of parking / traffic conditions for development permits, including environmental assessment and amendment to development permits.	Development Permits	\$ 1,149.00	\$ 879.00
20-175			Environmental Assessment / Amendment to Dev. Permits	\$ 711.00	\$ 1,516.00
20-176	Reserved Parking	Reserve parking per vehicle or moving van permit.	Per Parking Space	\$ 80.00	\$ 76.00
20-177	Parking Request	Administrative Review of a parking-related issue, such as a request for a red zone or disabled parking space. <i>This fee is set by Council Policy</i>		\$ 100.00	\$ 100.00
20-178	Traffic Request	Administrative Review of a limited scale traffic-related issue, such as a request for installation of a crosswalk or traffic calming measure. <i>This fee is set by Council Policy</i>		\$ 100.00	\$ 100.00
20-179	Stop Sign Request (2nd Request)	Processing a request to install a stop sign following initial denial / approval. <i>This fee is set by Council Policy</i>		\$ 500.00	\$ 500.00
20-180	Appeal to PPIC	Appeal an administrative decision to the Parking & Public Improvement Commission. <i>This fee is set by Council Policy</i>	Traffic	\$ 500.00	\$ 500.00
20-181			Encroachment	\$ 500.00	\$ 500.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-182	Construction Management and Parking Plan Review Fee	Supplemental traffic and parking review of remodels or minor projects.	Per Location		\$ 102.00
<b>BUILDING DIVISION FEES - FLAT AND MISCELLANEOUS</b>					
20-183	Building / Trades Permit Extension	Extension of building, mechanical, electrical, or plumbing permit prior to building permit expiration	Permit Extension	\$ 108.00	\$ 76.00
20-184	Building / Trades Permit Reinstatement	Reinstatement of an expired building, mechanical, electrical, or plumbing permit. <i>[See MBMC 9.01.050]</i>	Permit Reinstatement	\$ -	\$ 148.00
20-185	Building / Trades Plan Check Extension	Extension of building, mechanical, electrical, or plumbing plan check prior to plan check expiration	Plan Check Extension	\$ -	\$ 76.00
20-186	Building / Trades Plan Check Reinstatement	Reinstatement of expired plan check associated with building, mechanical, electrical, or plumbing permits.	Plan Check Reinstatement	\$ -	\$ 114.00
20-187	Building / Trades Extra Plan Check	Plan Checks over the standard number of plan checks or for non-standard applications.	Processing Fee	\$ 53.00	\$ 65.00
20-188			Hourly Rate	\$ 149.00	\$ 161.00
20-189	Re-Inspection / Extra Inspection	Request for a reinspection or extra inspection over the standard number of inspections (3) of a building site. (1-hr minimum)	Processing Fee	\$ 35.00	\$ 65.00
20-190			Hourly Rate	\$ 125.00	\$ 138.00
20-191	Custom Building Inspection	Inspection requested on a non-inspector working day. (4-hr min.)	Base Fee (4hrs)	\$ 535.00	\$ 582.00
20-192			Each Addl. Hour	\$ 125.00	\$ 138.00
20-193	Construction Operation After Hours Application	Reviewing an application for construction operation for work done after hours.	Request for Interior Commercial	\$ 186.00	\$ 149.00
20-194			Request for Exterior Commercial	\$ 186.00	\$ 733.00
20-195	Building Demolition	Review and inspection of a building demolition to ensure compliance with City Codes.	Partial	\$ 544.00	\$ 620.00
20-196			Full	\$ 544.00	\$ 423.00
20-197	Moving a Building	Review an application for moving a building within the City.		\$ 3,353.00	Actual Cost

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**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

<b>Reference Number</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE APRIL 18, 2020</b>
<b>20-198</b>	<b>Construction Site Sign Production</b>	Processing and production of contractor information signs for construction sites.	Base Fee	\$ 26.00	\$ 32.00
<b>20-199</b>			Per Sign	\$ 30.00	\$ 30.00
<b>20-200</b>	<b>Building Permit Transfer</b>	Transfer the ownership of a permit.		\$ 53.00	\$ 65.00
<b>20-201</b>	<b>Residential Bldg Records Report</b>	Provide a building records report on an address.	Per Application	\$ 309.00	\$ 294.00
<b>20-202</b>			Duplicate	\$ 53.00	\$ 43.00
<b>20-203</b>	<b>Staging Residential</b>	Review request for staging for residential properties.		\$ 761.00	\$ 295.00
<b>20-204</b>	<b>Temporary Certificate of Occupancy</b>	Review request for a temporary Certificate of Occupancy to allow for occupancy before the final certificate is issued.	Certificate	\$ 1,760.00	\$ 666.00
<b>20-205</b>			Extension	\$ 237.00	\$ 302.00
<b>20-206</b>	<b>Board of Building Appeals</b>	Processing an appeal of a Building Administrative Decision to the Board of Building Appeals.		\$ 488.00	\$ 938.00
<b>20-207</b>	<b>Comm Dev Refund Processing</b>	Processing a refund of a Community Development fee due to the actions of the applicant.		\$ 92.00	\$ 112.00
<b>20-208</b>	<b>Comm Dev Record Retention</b>	Retaining a permanent copy of records in Community Development.	Base Fee	\$ 35.00	\$ 43.00
<b>20-209</b>			Digital Copy	\$ 53.00	\$ 65.00
<b>20-210</b>			Data Extraction:	\$ 67.00	\$ 83.00
<b>20-211</b>	<b>Garage Sale Permit</b>	Review an application for a garage and yard sale permit. The municipal code allows 3 permits per household per year.		\$ 8.00	\$ 11.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
<b>Building Permits (Combination)</b>					
20-212	Kitchen / Bathroom Remodel	Review and inspection of residential kitchen / bathroom remodels	Up to 500 sq ft	\$ -	\$ 825.00
20-213			501-1,000 sq ft	\$ -	\$ 1,100.00
20-214			1,000+ sq ft	\$ -	\$ 1,375.00
20-215			Each addl 500 sq. ft.	\$ -	\$ 287.00
20-216	New Pool / Spa	Review and inspection of new pool or spa being installed.	Residential	\$ 259.00	\$ 978.00
20-217			Commercial	\$ 259.00	\$ 1,423.00
20-218	New Pool / Spa with Vault	Review and inspection of new pool or spa with a vault	Residential	\$ 259.00	\$ 1,560.00
20-219			Commercial	\$ 259.00	\$ 2,037.00
<b>Building Permits (Miscellaneous)</b>					
20-220	Grading Fees - Plan Check	Review of application associated with reviewing different grading categories	51-1,000 CY	\$ 220.00	\$ 1,002.00
20-221			1,001-10,000 CY	\$ 220.00	\$ 1,245.00
20-222			10,001-100,000 CY	\$ 343.00	\$ 1,487.00
20-223	Shoring Plan Check and Inspection	Reviewing and inspection of shoring requirements	500 sq. ft.	\$ 780.00	\$ 1,189.00
20-224			1,000 sq. ft.	\$ 1,201.00	\$ 1,622.00
20-225			3,000 sq. ft.	\$ 3,713.00	\$ 1,812.00
20-226			5,000 sq. ft.	\$ 4,501.00	\$ 2,330.00
20-227	Solar Permit Plan Check and Inspection	Review and inspect Solar / PV Permits for building and fire codes <i>[Plan Check and Inspection are set by council at \$50 each and both are required for permit issuance]</i>	Residential	\$ 100.00	\$ 100.00
20-228			Commercial up to 50 kw	\$ 100.00	\$ 100.00
20-229			Commercial 51-250 kw	\$ 100.00	\$ 100.00
20-230	Summary of Accessibility Upgrades for Commercial Projects	Review of accessibility upgrade hardship application.	Existing Buildings Valued less than LA County Accessibility Code	\$ 286.00	\$ 1,132.00
20-231			Existing Buildings Valued more than LA County Accessibility Code	\$ 286.00	\$ 1,512.00
20-232	Remodel Residential Pool / Spa	Review and inspection of residential pool and spa remodels for each discipline reviewed (electrical, plumbing, mechanical)	Remodel - per discipline	\$ 259.00	\$ 655.00
20-233	Tenant Improvement Commercial Pool / Spa	Review and inspection of commercial pool and spa remodels for each discipline reviewed (electrical, plumbing, mechanical)	TI - per discipline	\$ 259.00	\$ 1,043.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-234	Residential Room Addition / Remodel	Review and inspection of residential room addition and / or remodel.	Up to 500 sq. ft.		\$ 954.00
20-235			501-1,000 sq. ft.		\$ 1,553.00
20-236			1,000+ sq. ft.		\$ 1,877.00
20-237			Each addl 500 sq. ft. above 1,000 sq. ft.		\$ 287.00
20-238	Windows / Doors	Review and inspection of window / door permits per City standard form.	Up to 5		\$ 550.00
20-239			Greater than 5		\$ 687.00
20-240	Tent Permit (Building)	Review and inspection of temporary tents	Up to 400 sq. ft.		\$ 1,208.00
20-241			401-1,500 sq. ft.		\$ 1,831.00
20-242			1,500+ sq. ft.		\$ 3,009.00
20-243	Decks / Porches / Patios / Pergolas / Gazebos	Review and inspection of standalone decks / porches / patios / pergolas. Gazebos	Up to 500 sq. ft.		\$ 2,312.00
20-244			Greater than 500 sq. ft.		\$ 3,243.00
20-245			Addl 500 sq. ft.		\$ 368.00
20-246	Fences (greater than 6')	Review and inspection of standalone fences greater than 6"	All Others		\$ 768.00
20-247			ROW Adjacent		\$ 946.00
20-248	Retaining Wall	Review and inspection of retaining walls and block walls.	Retaining Wall		\$1,362
20-249	Block Walls		Block Wall		\$917
20-250	Re-Roof	Review and inspection of re-roofing projects for residential and commercial projects  Note: Does not include reroof with solar. Separate permit required for solar panels.	Residential		\$ 542.00
20-251			Commercial - Up to 1,500 sq. ft.		\$ 542.00
20-252			Commercial - 1,501-5,000 sq. ft.		\$ 610.00
20-253			Commercial - Greater than 5,000 sq. ft.		\$ 679.00
20-254			Commercial - Each Addl. 1,000 sq.ft. above 5,000 sq.. ft.		\$ 103.00
20-255	Re-Stuccoing / Siding / Façade	Review and inspection of standalone re-stucco / siding / façade projects.			\$ 687.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
<b>Mechanical, Electrical, and Plumbing Permits</b>					
<b>Electrical</b>					
20-256	Miscellaneous Electrical Permit	Review and inspection of standard and standalone over the counter electrical projects.		\$ 68.00	\$ 315.00
20-257	Temporary Power Pole	Review and inspection for each temporary power pole or piggy-back pole.		\$ 112.00	\$ 315.00
20-258	EV Charging Station	Review and inspection of EV Charging Stations	Residential	\$ -	\$ 422.00
20-259			Commercial	\$ -	\$ 529.00
20-260	Battery Backup	Review, inspect and issue permit for battery backups.		\$ -	\$ 422
20-261	Residential Remodel / Addition	Electrical upgrades to residential additions or remodel projects	per sq. ft.	\$ -	\$ 0.74
20-262	Commercial Tenant Improvement	Electrical upgrades, additions, or improvement to commercial / non-residential projects	per sq. ft.	\$ -	\$ 0.58
<b>Mechanical</b>					
20-263	Miscellaneous Mechanical Permit	Review and inspection of standard and standalone over the counter mechanical permits.		\$ 68.00	\$ 283.00
20-264	HVAC Permit	Review and inspection of HVAC permits	New / Relocate	\$ 68.00	\$ 670.00
20-265			Replacement / Change-Out	\$ 68.00	\$ 464.00
20-266	Residential Remodel / Addition	Mechanical upgrades to residential additions or remodel projects	per sq. ft.	\$ -	\$ 0.65
20-267	Commercial Tenant Improvement	Mechanical upgrades, additions, or improvement to commercial / non-residential projects	per sq. ft.	\$ -	\$ 0.56



**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
	<b>Plumbing</b>				
20-268	Miscellaneous Plumbing Permit	Review and inspection of standard and standalone over the counter plumbing permits.		\$ 68.00	\$ 315.00
20-269	Water Heater Permit	Review and inspection of water heater permit		\$ 92.00	\$ 283.00
20-270	Cesspool Removal Fee	Review and inspection for cesspool removal		\$ -	\$ 335.00
20-271	Residential Remodel / Addition	Plumbing upgrades to residential additions or remodel projects	per sq. ft.	\$ -	\$ 0.65
20-272	Commercial Tenant Improvement	Plumbing upgrades, additions, or improvement to commercial / non-residential projects	per sq. ft.	\$ -	\$ 0.56
	<b>Code Enforcement Fees</b>				
20-273	Violation Inspection Fee	Per hour violation inspection fee for code enforcement violations (2-hr min.)		\$ -	\$ 232.00
20-274	Non-Compliance Fee	Per Hour fee for non-compliance related inspections (6-hr min)		\$ -	\$ 697.00
<b>RIGHT-OF-WAY (ROW) FEES</b>					
20-275	Temporary Encroachment Permit - In ROW for Extended Period of Time		Pedestrian Canopy	\$ 247.00	\$ 310.00
20-276			Temp Fencing	\$ 247.00	\$ 310.00
20-277			Scaffolding	\$ 247.00	\$ 310.00
20-278			Extend	\$ -	\$ 60.00
20-279			Reinstate	\$ -	\$ 60.00
20-280	Street Use Permit - Temporary Use of Street Affecting Traffic		POD/ Roll-Off Bin or Lowboy	\$ 130.00	\$ 398.00
20-281			Crane	\$ 247.00	\$ 290.00
20-282			Concrete Pour	\$ 247.00	\$ 290.00
20-283			Delivery/Hauling of Materials	\$ 247.00	\$ 290.00
20-284			Storage of Materials	\$ 247.00	\$ 290.00
20-285			Equipment / Material Staging	\$ 247.00	\$ 290.00
20-286			Deposit for POD / Roll-Off Bin	\$ 465.00	\$ 465.00
20-287			Add-Ons	\$ -	\$ 53.00
20-288			Extend	\$ -	\$ 53.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-289	Public Works Permit - Generally Requires Special Rules or Review		Sandblasting	\$ 247.00	\$ 227.00
20-290			Vehicle on Strand or Walk Street	\$ 340.00	\$ 447.00
20-291			Over Quantitative Discharge	\$ 240.00	\$ 227.00
20-292			Well Monitoring	\$ -	\$ 227.00
20-293			Add-Ons	\$ -	\$ 60.00
20-294			Extend	\$ -	\$ 60.00
20-295	Excavation Permit - Involves Breaking Ground/Infrastructure		<b>Non-Utility Excavation</b>		
20-296			Curb & Gutter	\$ 231.00	\$ 337.00
20-297			Sidewalk	\$ 231.00	\$ 337.00
20-298			Driveway Approach	\$ 231.00	\$ 337.00
20-299			Add-Ons	\$ -	\$ 60.00
			Extend	\$ -	\$ 60.00
20-300	Excavation Permit - Involves Breaking Ground/Infrastructure		<b>Utility Excavation</b>		
20-301			Sewer Line	\$ 393.00	\$ 474.00
20-302			Water Line	\$ 393.00	\$ 474.00
20-303			Undergrounding	\$ 393.00	\$ 474.00
20-304			Sewer/Water Line Combo	\$ 393.00	\$ 474.00
20-305			Add-Ons	\$ -	\$ 60.00
			Extend	\$ -	\$ 60.00
20-306			<b>Utility Company Excavation</b>		
20-307			0-200 l.f.	\$ 393.00	\$ 641.00
20-308			200+ l.f.	\$ 1,038.00	\$ 1,128.00
20-309	200+ l.f. per l.f.	\$ 2.00	\$ 2.00		
20-310	Extra Inspections - per hr	\$ -	\$ 110.00		
	Extend	\$ -	\$ 60.00		
20-311	Lane Closure - Secondary Permit Only		Simple	\$ 247.00	\$ 106.00
20-312			Complex / Custom (incl. 1-hr of inspection)	\$ 931.00	\$ 453.00
20-313			Extra Inspections - per hr	\$ -	\$ 110.00
20-314			Add-Ons	\$ -	\$ 25.00
20-315			Extend	\$ -	\$ 25.00
20-316	Oversize Permit		Individual - <i>Set by Statute</i>	\$ 16.00	\$ 16.00
20-317			Annual	\$ 90.00	\$ 85.00
20-318			Extend	\$ -	\$ 25.00

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# COMBO PERMIT SQUARE FOOTAGE TABLE

## Combination Permits: New Construction and Tenant Improvements (includes Building, Mechanical, Electrical, and Plumbing)

Occupancy Type	Description	Sq Ft	Total Plan Check Cost		Total Inspection Cost		Total Cost Per Unit	
			Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft
<b>A - New (Other than A2)</b>	Assembly such as arenas, theaters, amphiteaters	500	\$3,957.79	\$106.78	\$3,603.90	\$97.23	\$7,561.68	\$204.01
		5,000	\$8,762.73	\$41.87	\$7,979.20	\$38.12	\$16,741.92	\$79.99
		50,000	\$27,602.59	\$55.21	\$25,134.47	\$50.27	\$52,737.06	\$105.47
<b>A2 - New</b>	Restaurant	500	\$4,816.83	\$129.95	\$4,557.58	\$122.96	\$9,374.41	\$252.91
		5,000	\$10,664.69	\$50.95	\$10,090.71	\$48.21	\$20,755.40	\$99.16
		50,000	\$33,593.78	\$67.19	\$31,785.74	\$63.57	\$65,379.52	\$130.76
<b>B or M - New</b>	Business or Retail	1,500	\$6,238.73	\$83.42	\$8,272.27	\$187.07	\$14,511.01	\$270.49
		5,000	\$9,158.57	\$196.91	\$14,819.56	\$318.62	\$23,978.13	\$515.53
		15,000	\$28,849.49	\$192.33	\$46,681.62	\$311.21	\$75,531.11	\$503.54
<b>E - New</b>	Educational Centers (i.e. Daycares)	500	\$3,647.99	\$98.42	\$5,091.09	\$137.35	\$8,739.08	\$235.77
		5,000	\$8,076.83	\$38.59	\$11,271.92	\$53.85	\$19,348.75	\$92.44
		50,000	\$25,442.01	\$50.88	\$35,506.56	\$71.01	\$60,948.57	\$121.90
<b>F-1, F-2 - New</b>	Factory	500	\$2,995.85	\$80.82	\$7,935.62	\$214.09	\$10,931.47	\$294.92
		5,000	\$6,632.95	\$31.69	\$17,569.84	\$83.94	\$24,202.79	\$115.64
		50,000	\$20,893.79	\$41.79	\$55,345.00	\$110.69	\$76,238.79	\$152.48
<b>H1-H5 - New</b>	Hazardous Occupancies (above the threshold specified by Building Code)	500	\$3,326.11	\$89.73	\$7,853.26	\$211.87	\$11,179.37	\$301.61
		5,000	\$7,364.16	\$35.18	\$17,387.49	\$83.07	\$24,751.65	\$118.26
		50,000	\$23,197.11	\$46.39	\$54,770.59	\$109.54	\$77,967.70	\$155.94
<b>I - New</b>	Institutions	500	\$4,133.71	\$111.52	\$5,091.09	\$137.35	\$9,224.80	\$248.87
		5,000	\$9,152.23	\$43.73	\$11,271.92	\$53.85	\$20,424.16	\$97.58
		50,000	\$28,829.54	\$57.66	\$35,506.56	\$71.01	\$64,336.10	\$128.67
<b>L - New</b>	Labrotaries	500	\$3,387.45	\$91.39	\$6,643.84	\$179.24	\$10,031.29	\$270.63
		5,000	\$7,499.98	\$35.83	\$14,709.77	\$70.28	\$22,209.75	\$106.11
		50,000	\$23,624.94	\$47.25	\$46,335.78	\$92.67	\$69,960.72	\$139.92
<b>R-1 - New</b>	Hotels / Motels	1,000	\$4,246.18	\$141.54	\$6,499.92	\$216.66	\$10,746.10	\$358.20
		10,000	\$16,984.72	\$40.57	\$25,999.66	\$62.11	\$42,984.39	\$102.68
		100,000	\$53,501.88	\$53.50	\$81,898.94	\$81.90	\$135,400.83	\$135.40
<b>R-2 - New</b>	Multi-Family / Apartment Housing	1,000	\$2,774.84	\$92.49	\$7,387.34	\$246.24	\$10,162.18	\$338.74
		10,000	\$11,099.35	\$26.52	\$29,549.37	\$70.59	\$40,648.72	\$97.11
		100,000	\$34,962.95	\$34.96	\$93,080.52	\$93.08	\$128,043.47	\$128.04

Note: All other fees not defined in this table are based on Direct Costs or Fully Burdened Rates and are executed at the discretion of the City Manager. Page 412 of 1239  
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## Combination Permits: New Construction and Tenant Improvements (includes Building, Mechanical, Electrical, and Plumbing)

Occupancy Type	Description	Sq Ft	Total Plan Check Cost		Total Inspection Cost		Total Cost Per Unit	
			Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft
R-3 - New*	Custom Single-Family Home	1,000	\$3,116.22	\$118.79	\$4,183.18	\$182.03	\$7,299.39	\$300.83
		3,000	\$5,492.10	\$94.99	\$7,823.82	\$228.91	\$13,315.92	\$323.91
		6,000	\$8,341.85	\$139.03	\$14,691.25	\$244.85	\$23,033.10	\$383.88
S-1 - New	Low Hazard Warehouse / Parking Garage	500	\$2,402.78	\$64.82	\$4,722.98	\$127.42	\$7,125.75	\$192.24
		5,000	\$5,319.86	\$25.42	\$10,456.90	\$49.96	\$15,776.76	\$75.38
		50,000	\$16,757.57	\$33.52	\$32,939.23	\$65.88	\$49,696.80	\$99.39
S-2 - New	Moderate Hazard Warehouse / Parking Garage	500	\$2,267.75	\$61.18	\$5,535.03	\$149.33	\$7,802.78	\$210.51
		5,000	\$5,020.91	\$23.99	\$12,254.83	\$58.55	\$17,275.73	\$82.54
		50,000	\$15,815.86	\$31.63	\$38,602.70	\$77.21	\$54,418.56	\$108.84
U - New	Utility / Miscellaneous Structure	50	\$435.06	\$117.37	\$301.28	\$81.28	\$736.33	\$198.65
		500	\$963.24	\$64.22	\$667.04	\$44.47	\$1,630.27	\$108.68
		5,000	\$3,852.94	\$77.06	\$2,668.15	\$53.36	\$6,521.09	\$130.42
Shell (Cold) - New	Shell Building consisting only of foundation and empty structure.	500	\$3,188.31	\$86.02	\$4,461.30	\$120.36	\$7,649.60	\$206.38
		5,000	\$7,059.07	\$33.73	\$9,877.52	\$47.19	\$16,936.59	\$80.92
		50,000	\$22,236.06	\$44.47	\$31,114.20	\$62.23	\$53,350.26	\$106.70
A (Other than A-2) - TI	Tenant Improvement / Addition to a Religious Institution, Arena, Theater, etc.	300	\$3,560.38	\$160.09	\$1,912.45	\$85.99	\$5,472.83	\$246.08
		3,000	\$7,882.86	\$62.77	\$4,234.25	\$33.72	\$12,117.10	\$96.49
		30,000	\$24,830.99	\$82.77	\$13,337.88	\$44.46	\$38,168.88	\$127.23
A-2 - TI	Tenant Improvement / Addition to a Restaurant	150	\$2,733.22	\$245.80	\$1,347.66	\$121.19	\$4,080.88	\$366.99
		1,500	\$6,051.49	\$96.38	\$2,983.78	\$47.52	\$9,035.26	\$143.89
		15,000	\$19,062.19	\$127.08	\$9,398.89	\$62.66	\$28,461.08	\$189.74
TI - All Others	Tenant Improvement / Addition to any type of occupancy that does not qualify as an arena, theater, institution or restaurant.	150	\$3,031.23	\$272.60	\$1,070.09	\$96.23	\$4,101.32	\$368.83
		1,500	\$6,711.29	\$106.88	\$2,369.23	\$37.73	\$9,080.53	\$144.62
		15,000	\$21,140.58	\$140.94	\$7,463.09	\$49.75	\$28,603.66	\$190.69

**Note: Building Official and Community Development Director have the discretion to charge time and materials for any project considered outside the scope of the projects listed above.**

\*Production Homes are charged full fee for initial plan, and 25% of plan check fee for additional plans. Inspection fees are not discounted.

\*\*Foundation only is charged as 10% of the building permit fee.

\*\*\* Plan check and permit fees calculated through this study are in relation to requirements imposed by the California Building Code (CBC). The CBC dictates the types of development projects and applications, which require different permits. The plan check and inspection fees are to review those projects and applications to ensure conformance with those building code requirements.

**Exhibit A Continued -**

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED)**

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
<b>CITY CLERK</b>					
20-001	Initiative Petition Processing	A formal notice of intent to circulate an initiative petition for a municipal measure. <i>[California Election Code Section - 9202(b)]</i>		\$ 200.00	\$ 200.00
20-002	Candidate Processing	Process a candidate for office in the City not to exceed \$25. <i>[California Election Code Section - 10228]</i>		\$ 25.00	\$ 25.00
20-003	Candidate Statement	Process a candidate statement for publication electronically or in voter guide per <i>California Election Code Section 13307</i> .	Bi-Annual (10 or less)	Actual Cost	Actual Cost
20-004	Reproduction Service	Making a copy of a City document upon request. <i>[Per City Resolution 6302]</i>	Regular Copies	\$ 0.10	\$ 0.10
20-005			Election Documents	\$ 0.10	\$ 0.10
20-006	Archive Retrieval	Based upon request, retrieve an archived document per box pickup, delivery, and re-file in storage. Direct cost to cover contractor costs		Actual Cost	Actual Cost
20-007	Copy Service	Making a copy of an audiotape, CD, DVD, or PDF file.	Tape / CD / DVD / PDF	\$ 7.00	\$ 8.00
20-008	Lobbyist Registration	Process registration for lobbyist.		\$ 14.00	\$ 30.00
<b>FINANCE FEES</b>					
20-009	Return Check & Insufficient Funds Fee	Re-processing of checks or other payments due to insufficient funds. <i>[California Civil Code Section 1719]</i>	First Check	\$ 53.00	\$ 25.00
20-010			Subsequent Check	\$ 53.00	\$ 35.00
20-011	Business License Identification Decal	Issue a decal when a business license requires the use of a vehicle on request.		\$ 4.00	\$ 5.00
20-012	Custom License Listing Request	Providing a unique listing of customized business and animal licensing information.	Custom	\$ 40.00	\$ 40.00
20-013			Existing	\$ 20.00	\$ 25.00
20-014	Dog Licenses	Licensing of animals within the City Limits. - 50% discount for seniors 62+ with income under \$10,000.	Spayed / Neutered	\$ 20.00	\$ 21.00
20-015		- No Charge for handicapped, disabled or seeing eye dogs.	All Others	\$ 52.00	\$ 48.00
20-016		- Late Penalty of 20% per month not to exceed 100%.	Duplicate Tag	\$ 4.00	\$ 4.00

NOTE: ALL OTHER FEES NOT DEFINED IN THIS TABLE ARE BASED ON FULLY BURDENED RATES AND ARE EXECUTED AT THE DISCRETION OF THE CITY MANAGER

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
<b>PARKS AND RECREATION FEES (NON-PROGRAM / ACTIVITY RELATED)</b>					
20-017	<b>Banner Installation</b>	Hanging a banner across the public right-of-way at the request of a private party.	Sepulveda Blvd.	\$ 300.00	\$ 372.00
20-018			All Other	\$ 277.00	\$ 325.00
20-019	<b>Special Events Application</b>	Processing a request for a special event within the City.	Pass-through (only City access no support)	\$ 809.00	\$ 662.00
20-020			Repeat or Legacy (with no major changes)	\$ 809.00	\$ 977.00
20-021			New (or with major changes)	\$ 809.00	\$ 1,417.00
20-022	<b>Film Permits - Application</b>	Review an application for a motion picture or still photography, which takes place in the City.	Motion Picture	\$ 489.00	\$ 528.00
20-023			Still Photography	\$ 178.00	\$ 208.00
<b>POLICE FEES</b>					
20-024	<b>Amplified Sound Permit</b>	Reviewing a Request to use amplified sound in a non-commercial area.		\$ 227.00	\$ 183.00
20-025	<b>Retail Firearm Permit</b>	Review of a request to sell firearms within the City	New	\$ 1,012.00	\$ 944.00
20-026		Renewal of a request to sell firearms within the City.	Renewal	\$ 234.00	\$ 242.00
20-027	<b>Block Party Permit</b>	Review an application for a block party.		\$ 50.00	\$ 50.00
20-028	<b>Weapons Discharge Permit</b>	Review an application for a weapons discharge permit within the City.		\$ 601.00	\$ 603.00
<b>COMMUNITY AFFAIRS</b>					
20-029	<b>Alarm System Permit</b>	Registration of new property alarms within the City.	New	\$ 55.00	\$ 57.00
20-030		Annual renewal of Alarm System Permits already registered within the City.	Renewal	\$ 25.00	\$ 29.00
20-031	<b>Alarm School</b>	As-needed class providing education and best practices for alarm system users who have had "false alarm" incidents. Completion forgives one invoice per year		\$ 64.00	\$ 91.00



**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
	<b>TECHNICAL SUPPORT</b>				
20-032	<b>Fingerprint Card / Live Scan</b>	Fingerprint a person on a card or process a live scan fingerprint. This is the City's charge in addition to any DOJ fees.		\$ 19.00	\$ 23.00
20-033	<b>Digital Reproduction</b>	Providing a Police audio recording upon request.	Audio	\$ 58.00	\$ 96.00
20-034		Providing a police video recording upon request.	Video	\$ 131.00	\$ 213.00
20-035	<b>Police Record Clearance Letter</b>	Research and prepare clearance letter for individuals requesting the service.		\$ 43.00	\$ 56.00
20-036	<b>Police Photos - Film &amp; Digital</b>	Providing copies of police photographs on request.	Per Photo / Page	\$ 5.00	\$ 6.00
20-037		Providing copies of police photographs on a CD upon request.	Per CD	\$ 9.00	\$ 13.00
20-038	<b>Data Research and Release</b>	Research and compilation of data in police records upon request.		\$ 105.00	\$ 119.00
20-039	<b>Special Business - DOJ Check</b>	Processing an individual who is involved in the operation of certain special businesses, which involves checking that individual against the DOJ's records.		\$ 913.00	\$ 1,159.00
20-040	<b>Police Reports</b>	Producing a copy of a police report upon request. <i>[Per City Resolution 6302]</i>	Per Page	\$ 0.10	\$ 0.10
	<b>JAIL OPERATIONS</b>				
20-041	<b>Booking Fee</b>	Process an individual under arrest for booking. *Plus additional County Fees		\$ 259.00	\$ 266.00
	<b>PARKING</b>				
20-042	<b>Impound Vehicle Release</b>	Collection and release of vehicles impounded by the City.	Lot Release (at tow-yard)	\$ 118.00	\$ 137.00
20-043		Collection and field release of vehicles impounded by the City.	Field Release (on-street)	\$ 47.00	\$ 54.00
20-044	<b>Vehicle Inspection / Correction</b>	Inspect vehicle and sign-off citation for correctable violation.		\$ 26.00	\$ 27.00
20-045	<b>Boot Removal</b>	Installation and removal of a parking boot, due to non-payment of 5 or more parking citations.		\$ 109.00	\$ 183.00
20-046	<b>Handicap Violation Waiver Admin Fee</b>	Processing of repeated handicap violation waivers for citations issued to individuals with a handicapped placard. <i>No charge for the first waiver.</i>		\$ 25.00	\$ 32.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
<b>ANIMAL SERVICES</b>					
20-047	Animal Relinquishment	Pick up of dead animals for relinquishment on request.	Dead	\$ 107.00	\$ 118.00
20-048		Pick up of live animals for relinquishment on request.	Live Animal	\$ 213.00	\$ 236.00
20-049	Animal Quarantine Inspection	Inspection of a home and re-checks when an animal is required to be quarantined.		\$ 267.00	\$ 295.00
<b>FIRE</b>					
20-050	Fire Code Annual Permits / State Mandated Fire Inspections	Review, inspect and issue an annual permit based on the business operation as defined by the California Fire Code, Section 105.6, and occupancy classifications as determined by the California State Fire Marshal	<b>Operational &amp; State Mandated</b>		
20-051			0-2,000 SF	\$ 223.00	\$ 232.00
20-052			2,000-10,000 SF	\$ 223.00	\$ 349.00
20-053			10,000+ SF	\$ 223.00	\$ 465.00
			Complex Building	<b>Actual Cost</b>	<b>Actual Cost</b>
			<b>Multi-Family Dwelling Units</b>		
20-054			3-10 units	\$ -	\$ 232.00
20-055			11-20 units	\$ -	\$ 349.00
20-056			20+ units	\$ -	\$ 465.00
20-057			High Rise	\$ 782.00	\$ 813.00
20-058		Issue a fire code permit for a soundstage involving a major review and inspection. (Per Soundstage) <i>[Current fees collected by agreement.]</i>	Soundstage	\$ 6,667.00	\$ 6,667.00
20-059	Fire, Temporary Permit	Review, inspect, and issue a permit for an event that will have one or more operational permits as defined by the California Fire Code, Section 105.6	Minor Event	\$ 279.00	\$ 290.00
20-060		Review, inspect and issue a permit for an event that consumes the time and resources of the fire department, based on the judgement of the Fire Marshal	Major Event	\$ 476.00	\$ 560.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-061	<b>Fire, Temporary Permit</b>	Review, inspect and issue a permit for an individual operation under the California Fire Code, Section 105.6 with specific start and end times	One Time Permit	\$ 279.00	\$ 290.00
20-062		A temporary permit may require a Fire Safety Officer to stand by during the course of the permit, as determined by the Fire Marshal. Staffing by the Fire Department for a major event	City Staff support Costs at Fully Burdened Rate/hour	Actual Cost	Actual Cost
20-063	<b>Fire Re-Inspection</b>	Reinspection of an Annual Business Inspection or Temporary Permit **Per hour <del>**No charge for first two inspections-</del>		\$ 223.00	\$ 232.00
20-064	<b>Fire Annual Business Inspection</b>	Providing an annual fire and life safety inspection of a business with the City.  <del>**No Charge for first two inspections</del>	0-2,000 SF	\$ 276.00	\$ 220.00
20-065			2,000-10,000 SF	\$ 404.00	\$ 335.00
20-066			10,000+ SF	\$ 828.00	\$ 451.00
20-067			Complex Building	Actual Cost	Actual Cost
20-068	<b>Fire Residential Sprinkler</b>	Review a plan and inspect a residential fire sprinkler system for conformity with fire code requirements.	Plan Check	\$ 164.00	\$ 482.00
20-069			Inspection	\$ 220.00	\$ 307.00
20-070	<b>Fire Commercial Sprinkler</b>	Review a plan and inspect a commercial fire sprinkler system for conformity with fire code requirements.	Plan Check	\$ 288.00	\$ 482.00
20-071			<b>Inspection:</b> 1-50 heads	\$ 276.00	\$ 365.00
20-072			51-100 heads	\$ 499.00	\$ 597.00
20-073			101+ heads	\$ 723.00	\$ 829.00
20-074	<b>Fire Alarm System</b>	Review a plan and inspect a fire alarm system for conformity with fire code requirements.	Plan Check	\$ 220.00	\$ 482.00
20-075			<b>Inspection:</b> 0-2,000 SF	\$ 220.00	\$ 307.00
20-076			2,000-10,000 SF	\$ 332.00	\$ 423.00
20-077			10,000+ SF	\$ 555.00	\$ 655.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-078	Fire Protection System	Review a plan and inspect a fire protection system for conformity with fire code requirements, including items such as Hood / Suppression, Medical Gas System, Underground Fire Service Line, Underground Storage Tank, Above Ground Storage Tank, Private Fire Hydrant, etc.	Plan Check	\$ 276.00	\$ 504.00
20-079			Inspection	\$ 443.00	\$ 539.00
20-080	Fire Solar System - Variance Review	Review of solar system for variance from fire code. Variance may not be granted. Cost applies regardless of outcome	Per review request	\$ -	\$ 140.00
20-081	Fire Expedited Review	Request to process plan check in an expedited manner (includes 2 rechecks).	Per request	\$ -	\$ 687.00
20-082	Fire Revision	Revision after a permit has been issued.	Revision - per revision	Actual Cost	Actual Cost
20-083	Ambulance Transport	Ambulance transport with advanced life support. <i>[Per Resolution 6262]</i>	ALS	Current LA County Rate	
20-084		Ambulance transport with basic life support. <i>[Per Resolution 6262]</i>	BLS (Service provided by McCormick Ambulance)	Current LA County Rate	
<b>PUBLIC WORKS FEES</b>					
	<b>ADMINISTRATIVE</b>				
20-319	Barricade Rental	Assist residents with the daily rental of barricades without and with flasher, 8ft. In length, delineators, 18 inch cones and temporary no parking cardboard signs for block parties. This permit includes two 8' Street Closure Barricades.	Block Party Package	\$ 26.00	\$ 36.00
20-320		Assist residents with the daily rental of delineators, 18 inch cones and temporary no parking cardboard signs for moving purposes.	Moving Package - Standard	\$ 30.00	\$ 40.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-321	Barricade Rental (Cont.,)	*Includes the price of the delineators and signs.	Moving Package - Deluxe	\$ 45.00	\$ 51.00
<b>CIVIL ENGINEERING</b>					
20-322	Final Tract Map Review	Reviewing the final tract map to determine extent to which it complies with appropriate code requirements. <b>**Map Copy Deposit of \$500</b>	Application	\$ 748.00	\$ 852.00
20-323	New / Relocate Utility Pole	Review a request for a new or relocated utility pole.	Standard	\$ 2,091.00	\$ 2,397.00
20-324		Review a request for a new or relocated utility pole requiring PPIC review.	PPIC Review	\$ 2,614.00	\$ 3,001.00
20-325	Online Bid and Proposal Service Fee for Capital Projects and (Public Construction)	Service fee associated with setting up, loading digital plans, specifications and other bidding documents on-line to facilitate bid submittal online by contractors.	Simple Projects (Under \$100k)	\$ -	\$ 60.00
20-326			Moderately Complex Projects (\$100k-\$500k)	\$ -	\$ 81.00
20-327			Complex Projects (Greater than \$500k)	\$ -	\$ 100.00
<b>TREES</b>					
20-328	Tree Permit - Private Property	Remove, replace, or protect a tree on private property under the terms of the Tree Ordinance.	Dead / Dying Tree	\$ 322.00	\$ 100.00
20-329			Removal / Replacement	\$ 481.00	\$ 100.00
20-330			Protection	\$ 352.00	\$ 100.00
20-331			Removal in Public Right-of-Way	\$ 210.00	\$ 100.00
20-332	Tree Trimming Permit	Review and inspect tree trimming request.	Private Property	\$ 65.00	\$ 83.00
20-333			In Public ROW	\$ 65.00	\$ 138.00
<b>UTILITIES</b>					
20-334	Commercial SUSMP Review	Review of a commercial stormwater mitigation plan for compliance with national and local stormwater standards.		\$ 776.00	\$ 846.00
20-335	Temporary Water Meter Rental	Install or move a temporary 3" fire hydrant meter at a construction site. <b>**Meter deposit of \$1,500 required.</b>	Installation	\$ 97.00	\$ 241.00
20-336			Move	\$ 77.00	\$ 145.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-337	<b>Water Meter Test</b>	Field or bench calibration of a water meter upon a request by a resident or business.	5/8' - 1" meter	\$ 250.00	\$ 355.00
20-338		**Charges are refundable if meter is running fast.	1.5"+ meter	\$ 327.00	\$ 433.00
20-339	<b>Water Service Turn-On</b>	Turning on water service after water service has been turned off to a residence or business for contractor to work on water system or for non-payment of water bill. **\$15 collection for payment in the field.	Monday - Thursday 8:00 am - 4:30 pm	\$ 47.00	\$ 154.00
20-340		***5% Penalty on unpaid water bills (per Resolution 5726).	Afterhours, weekends, or holidays	\$ 218.00	\$ 369.00
20-341	<b>Water Meter Installation Inspection</b>	Installation of new water meter upon request	3/4" - 1" meter	\$ 71.00	\$ 96.00
20-342		**Material costs not included	1" - 2" meter	\$ 122.00	\$ 164.00
20-343			Greater than 2" meter	<b>Actual Cost</b>	<b>Actual Cost</b>
20-344	<b>F.O.G. &amp; Clean Bay Restaurant Inspections</b>	Annual inspection of kitchen equipment/fixtures and Best Management Practices for compliance with stormwater and wastewater regulation compliance.	Initial Inspection	\$ 200.00	\$ 193.00
20-345			Follow-up Inspection	\$ 109.00	\$ 139.00
20-346	<b>Clean Bay Restaurant Inspection for Stormwater Permit Compliance</b>	Annual inspection of kitchen equipment / fixtures and best management practices for compliance with stormwater regulation compliance. **Plus additional County Fees		\$ 204.00	\$ 221.00
20-347	<b>Waste Management Plan</b>	Review & processing of the plan and weight tickets for any demolition or remodel over \$100,000 in value for its waste management impact.		\$ 252.00	\$ 280.00

# Appendix D: Affirmatively Furthering Fair Housing

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# 1 Introduction

Fair housing occurs when individuals of similar income levels in the same housing market have the same range of housing choice available to them regardless of their characteristics as protected under local, State, and Federal laws. Fair housing choice occurs when citizens pursuing housing options are free from discrimination on the basis of race/ethnicity, religion, sex, marital status, ancestry, national origin, color, familial status, or disability—hereinafter referred to as “protected characteristics”—by the California Fair Employment and Housing Act, California Government Code Section 65008, and other State and Federal fair housing and planning laws. In 2018, Assembly Bill 686, Housing Discrimination: Affirmatively Further Fair Housing, amended Sections 65583 and 65582.2 of the California Government Code to require a public agency to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing.

From freeway expansion to discriminatory housing loan practices, historically underserved communities across the nation have experienced decades of housing disinvestment and infrastructure underinvestment, leaving many communities with higher rates of air pollution, poverty, unemployment, educational attainment, and health risks.<sup>1</sup> State and Federal laws, such as the Fair Housing Act, have established pathways for local jurisdictions to create more diverse and equitable communities, but reversing decades of discriminatory policies at all levels of the public and private sectors is complex, and many challenges to equitable development remain. The General Plan Housing Element must affirmatively further fair housing by first identifying segregated living patterns and barriers to fair housing, then identifying potential sites for affordable housing in areas of opportunity and implementing programs that aim to replace segregated living patterns and transform racially and ethnically concentrated areas of poverty. Ensuring that sites for housing, particularly units available for lower-income households, are located in high-resource areas, rather than concentrated in areas of high segregation and poverty, requires jurisdictions to plan for housing with regards to the accessibility of various opportunities, including jobs, transportation, good education, and health services.

This appendix serves as an assessment of fair housing practices pursuant to California Government Code Section 65583(c)(10) in the City of Manhattan Beach (City). Housing Elements are required to include the following:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and outreach capacity.
- An analysis of available Federal, State, and local data and knowledge to identify integration and segregation patterns and trends; racially or ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs within the jurisdiction, including displacement risk.
- An assessment of the factors that contribute to the fair housing issues identified in the analysis.

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<sup>1</sup> Affirmatively Furthering Fair Housing, April 2021. California Department of Housing and Community Development.

- An identification of the jurisdiction’s fair housing priorities and goals, giving highest priority to the greatest contributing factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.
- Measurable strategies and actions to implement the fair housing priorities and goals in the form of programs to affirmatively further fair housing.

## 2 Regional Analysis of Impediments

The City is committed to affirmatively furthering fair housing choice and promoting equal housing opportunity in accordance with the requirements of Federal and State fair housing law. To achieve this, the City participates in the regional Analysis of Impediments to Fair Housing Choice for the Community Development Commission and the Housing Authority of the County of Los Angeles (HACoLA) and works to remove these impediments. The Analysis of Impediments identifies impediments to fair housing choice, contributing factors, and goals for overcoming the barriers that have been identified as contributing to fair housing issues pertaining specifically to the “Urban County” and the areas served by the HACoLA (“service area”).<sup>2</sup> These impediments are in relation to the following fair housing issues:

- Segregation and integration
- Racially or ethnically concentrated areas of poverty
- Disparities in access to opportunity
- Disproportionate housing needs
- Discrimination or violations of civil rights laws or regulations related to housing

Relevant portions of the regional Analysis of Impediments have been incorporated into this assessment of fair housing for the City’s General Plan Housing Element to complement the analysis, and identify contributing factors, strategies, and actions, where applicable.

## 3 Housing Element Outreach

The City has been able to enhance the types and levels of community engagement due to significant strides in technology in recent years. Past engagement may have had fewer forms of media, meaning that public meetings were the primary media, with surveys and stakeholder interviews and other types of engagement taking a secondary role. Public meetings may have occurred during only one specific time and offered in a language not understood by a significant portion of the community, resulting in people unable to attend and/or participate. Virtual meetings could also be inaccessible if individuals did not have reliable internet.

Engagement related to the Housing Element has attempted to be comprehensive while in the context of the COVID-19 pandemic. Community engagement and outreach has been solely done in English, because the majority of the population (98 percent per 2019 Census data) comes from an English-only-speaking household or speak English “very well.” Opportunities for public participation are typically advertised in

---

<sup>2</sup> [http://web.mit.edu/afs/athena.mit.edu/org/f/fairhousing/plans/CA\\_LACounty\\_AI\\_volume-i.pdf](http://web.mit.edu/afs/athena.mit.edu/org/f/fairhousing/plans/CA_LACounty_AI_volume-i.pdf).

two local newspapers that are popular and well-read, in addition to advertising the events on the City's social media platforms and City website. Please refer to **Appendix F, Community Engagement Summary**, for a full summary of outreach materials and outreach conducted as part of the Housing Element update.

## 4 Assessment of Fair Housing

### 4.1 Fair Housing Enforcement and Outreach

This section provides information on the organizations that provide fair housing services to providers and consumers of housing, as well as the nature and extent of fair housing complaints received by the fair housing provider within the service area.

Fair housing services available in the service area include outreach and education, complaint intake, and testing and enforcement activities. Organizations that provide fair housing services include the following:

- U.S. Department of Housing and Urban Development (HUD)
- California Department of Fair Employment and Housing
- Housing Rights Center (HRC)
- Housing Authority of the County of Los Angeles (HACoLA)
- Fair Housing Council of Orange County

The City contracts with the HRC for fair housing and mediation services, and provides fair housing information and referrals upon request. The HRC, which primarily operates in Los Angeles County, receives multi-year grants from HUD to conduct testing in areas where statistics point to discrimination, specifically, persistent housing discrimination based on race, national origin, familial status, and disability. The organization also provides resolution for housing discrimination, including mediation and litigation services. HACoLA provides online resources on its website, such as links to various organizations, including HUD, HRC, and advocacy groups, as well as relevant policy documents.

For the region Los Angeles–Long Beach–Anaheim, the Fair Housing Council of Orange County provides similar services to HACoLA's, and additionally provides low-cost advocacy, mediation, individual counseling, and comprehensive community education.

#### 4.1.1 Findings, Lawsuits, Enforcement Actions, Settlements, or Judgments Related to Fair Housing or Civil Rights

Data collected from 2008 through 2016 shows that the most common basis for complaints in the service area were for disability, familial status, and race, according to the Regional Analysis of Impediments. Of the 2,610 complaints logged from 2008 to 2016, 57 percent were determined to have no cause and 21.6 percent were deemed successfully settled. In recent history, the City has not been involved in any lawsuits related to fair housing, and the City has no ongoing litigation in terms of housing rights or civil rights violations. According to HUD's Office of Fair Housing and Equal Opportunity, from 2013 through 2021, there were seven inquiries in the City. Of the seven inquiries, two were related to familial status and five

were documented as “none.” The inquiries filed were determined have “no valid basis” or “failure to respond.”

The HRC provides the City with quarterly reports of direct services, discrimination inquiries and cases, tenant and rental-owner services, and demographics reporting for the fiscal year (July through June). An average of 12 persons were provided services related to general housing and discrimination from the July 2014 to June 2015 fiscal year through the July 2020 to June 2021 fiscal year. Over the last seven fiscal years, the median number of discrimination cases reported was one. Tenant and rental-owner services provided in the City over the last 7 years were related to late fees, lease terms, substandard housing conditions,<sup>3</sup> security deposits, and other issues. Approximately 78 percent of callers or persons seeking services from the HRC were in-place tenants, and 15 percent were rental owners or management companies. Similar to cases reported in the Regional Analysis of Impediments, the most common complaint in the City was for issues related to accommodations for people with physical and mental disabilities. The City has been successful in addressing general housing and discrimination issues, as 56 percent of reported inquiries were resolved; 20 percent were addressed through mediation and legal aid provided by the HRC; and other cases related to substandard housing conditions were addressed by the City’s Building and Safety and Code Enforcement Departments, and the County of Los Angeles Department of Public Health.

#### 4.1.2 Compliance with Fair Housing Laws

The City is compliant with State fair housing laws, and administers programs and activities relating to housing and community development in a manner to affirmatively further fair housing, including the State’s Density Bonus Law (California Government Code Sections 65915–65918), Housing Element laws, the definition of family, the California Employee Housing Act, and Reasonable Accommodation Procedures. Local fair housing law implemented by the City includes procedures and standards set forth under Section 10.88.070 of the Manhattan Beach Municipal Code for the conversion of existing multifamily rental housing to condominiums. Such conversions may significantly affect the balance between rental and ownership housing within the City, such as reducing the variety of individual choices of tenure, type, price, and location of housing; increasing overall rents; decreasing the supply of rental housing for all income groups; and displacing individuals and families. As such, the City sets forth requirements, including tenant notification, notification of a right to purchase, tenant purchase discounts, and relocation expenses. Special provision is also made for lifetime leases for non-purchasing older adult tenants or tenants with a medical disability. In addition, low- and moderate-income tenants and those with children are provided with an extended relocation period. In evaluating requests for condominium conversions, the City’s Planning Commission must consider the impact of tenant displacement, with emphasis on existing low- and moderate-income tenants.

#### 4.1.3 Other Resources

The following resources are available to the City’s residents:

---

<sup>3</sup> “Substandard housing” problems/conditions as defined by the U.S. Census include households without hot and cold piped water, a flush toilet, and/or a bathtub or shower, and/or households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

**Stay Housed LA County:** The COVID-19 pandemic has cost people their jobs and livelihoods. This has left an estimated one-third of households in Los Angeles County unable to make rent and facing losing their homes. In response, Stay Housed LA County is a tenant assistance program that provides free legal services to tenants facing eviction during the COVID-19 public health crisis.

**CA COVID-19 Rent Relief – Housing Is Key:** This program helps income-eligible households pay rent and utilities for past-due and future payments. The Federal Consolidated Appropriations Act of 2021 provides funding to support the program and tenant (renter) protection laws signed by Governor Newsom.

**Los Angeles County Mortgage Relief Program:** This County of Los Angeles (County) program includes a relief fund that provides grants of up to \$20,000 for qualified property owners, plus expanded foreclosure prevention counseling services.

**Housing Rights Center:** Housing counselors are available to answer questions about tenant/rental-owner rights and obligations, including topics like security deposits, evictions, repairs, rent increases, harassment, and more. Conversations with housing counselors are confidential, and can help residents find the resources they need.

## 4.2 Segregation and Integration

Patterns of segregation have been commonly linked to poorer life outcomes related to income, housing equity, educational attainment, and life expectancy, according to research from the University of California, Berkeley (UC Berkeley).<sup>4</sup> Affirmatively Furthering Fair Housing (AFFH) involves overcoming patterns of segregation to foster inclusive communities. This section will analyze segregation and integration patterns in the City relating to race and ethnicity, household income, familial status, persons with disabilities, and neighborhood segregation using the AFFH Data and Mapping Resources from the California Department of Housing and Community Development (HCD).

### 4.2.1 City Boundary and Geography

The City is located within the southwestern coastal portion of Los Angeles County in what is commonly referred to locally as the “South Bay” area. The City is generally bound by Rosecrans Avenue to the north, Aviation Boulevard to the east, Artesia Boulevard to south, and the Pacific Ocean to the west. Abutting cities are the City of El Segundo to the north, City of Hawthorne and portions of the City of Redondo Beach to the east, and portions of City of Redondo Beach and City of Hermosa Beach to the south. **Figure 1, City Map**, provides an overview of the City’s planning areas that reflect the City’s unique and varied environment. For a description of the distinct planning areas, refer to **Appendix B, Needs Assessment**. Major thoroughfares running east/west in the City include Rosecrans Avenue, Marine Avenue, Manhattan Beach Boulevard—which also serves as a dividing street between the City’s northern and southern areas—and Artesia Boulevard. Major thoroughfares running north/south in the City include Highland Avenue, Sepulveda Boulevard—which also serves as a dividing street between the City’s eastern and western areas—and Aviation Boulevard.

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<sup>4</sup> Menedian, S., and S. Gambhir. 2018. “Racial Segregation in the San Francisco Bay Area.” Othering & Belonging Institute, UC Berkeley. <https://belonging.berkeley.edu/study-finds-strong-correlations-between-segregation-and-life-outcomes-sf-bay-area>.



Figure 1. City Map

## 4.2.2 Race and Ethnicity

The population within the City is primarily White. Approximately 73 percent of City residents are non-Hispanic White. The percentage of Hispanic people residing in the City is 8 percent. The Asian population, at 13 percent, represents the largest non-Hispanic minority.

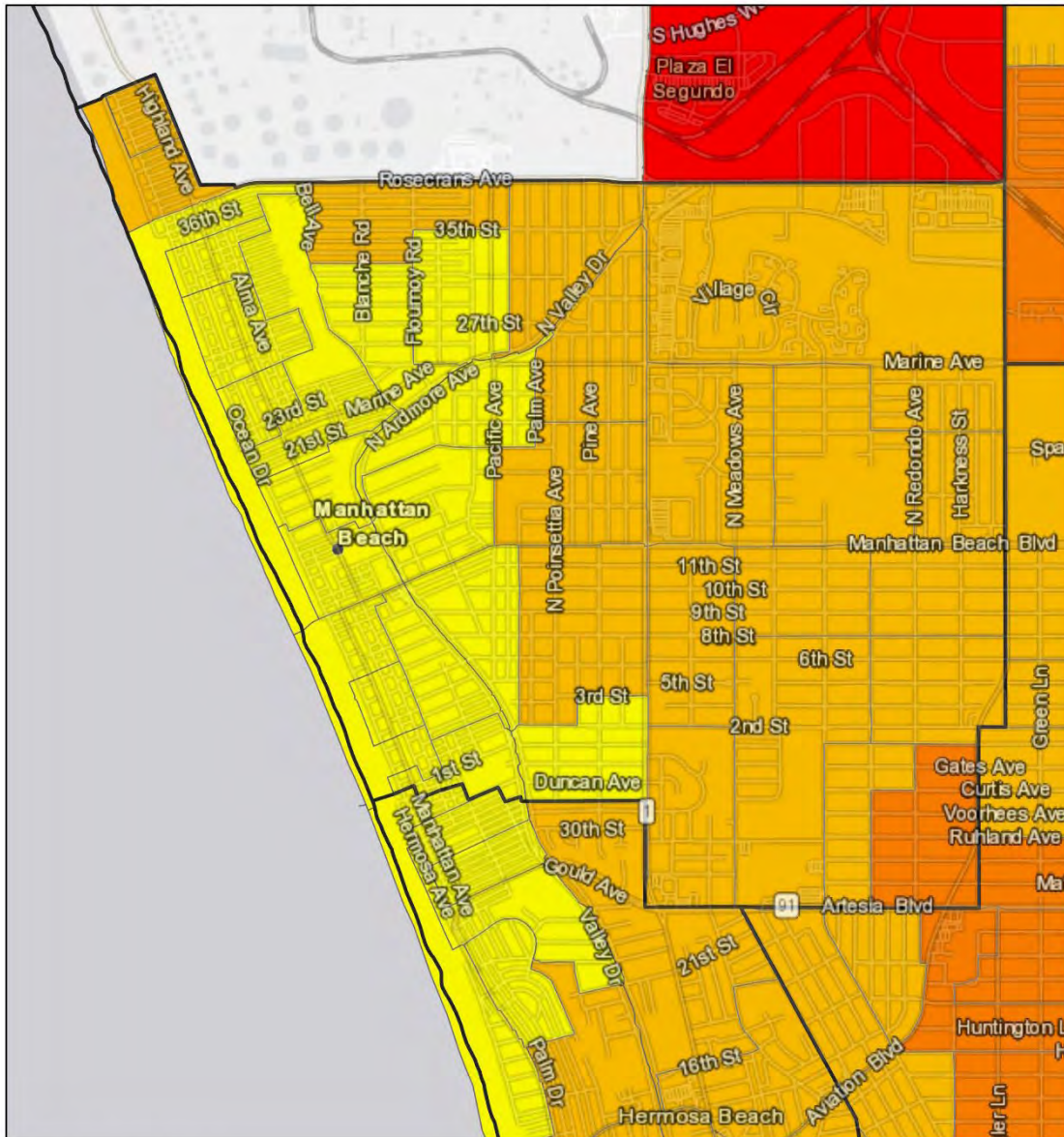
**Figure 2, City Racial Demographics (2018)**, shows the percent of the total non-White population by Census block group. Census block groups east of Pacific Avenue make up 21 percent to 40 percent of the total non-White population in the City. Block groups west of Pacific Avenue make up a non-White population of less than or equal to 20 percent. One block group in the southeast corner of the City, along Artesia Boulevard, makes up a higher percentage of non-White population (41 percent to 60 percent). As compared to **Figure 3, City Racial Demographics (2010)**, which illustrates the percent of the total non-White population by Census block in 2010, patterns over time show that the non-White population of the City increased significantly by 2018. In 2010, more than half of the Census block in the City made up less than 20 percent of the total non-White population in the City and by 2018 block groups in the eastern and southeastern part of the City make up 21 percent to 40 percent of the total non-White population in the City. This shows patterns over time where previously majority-White neighborhoods are becoming increasingly non-White. At a regional scale, including the South Bay and some Gateway Cities<sup>5</sup> areas, the City is among the areas with the lower population of non-White persons, as shown in **Figure 4, Regional Racial Demographics**. This may indicate a regional influence on the City in regard to changing demographics.

Generally, the average racial composition and number of people of different races or ethnicities in neighborhoods differs depending on location. To further examine this, this assessment relies on a calculation of the diversity index, which summarizes racial and ethnic diversity. The diversity index shows the likelihood that two persons, chosen at random from the same area, belong to different race or ethnic groups. Diversity index data is available at the block group level and ranges from 0 (no diversity) to 100 (complete diversity). **Figure 5, Diversity Index**, indicates that the City has low diversity, and particularly lower diversity on the western side (west of Sepulveda Boulevard), and moderate (40–55, 55–70) diversity index scores east of Sepulveda Boulevard and in the southeast corner of the City. At a regional scale, other South Bay cities east of the City have higher diversity, with block groups scoring a diversity index of greater than 85.

For regional assessments, areas with a shade of light gray indicate no data is available. The area shaded light gray north of the City, outside of City boundaries, in **Figures 2 and 4**, is the location of the Chevron refinery.

---

<sup>5</sup> "Gateway Cities" locally refers to a crescent of land along the southeast edge of Los Angeles County, bordering nearby Orange County, that encompasses 27 cities, including Compton, Long Beach, South Gate, and Lynwood. For a full list of cities, see Los Angeles County Economic Development Corporation at <https://laedc.org/wtc/chooselacounty/regions-of-la-county/gateway-cities/>.



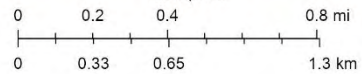
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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group

- ≤ 20%
- 21 - 40%
- 41 - 60%
- > 81%

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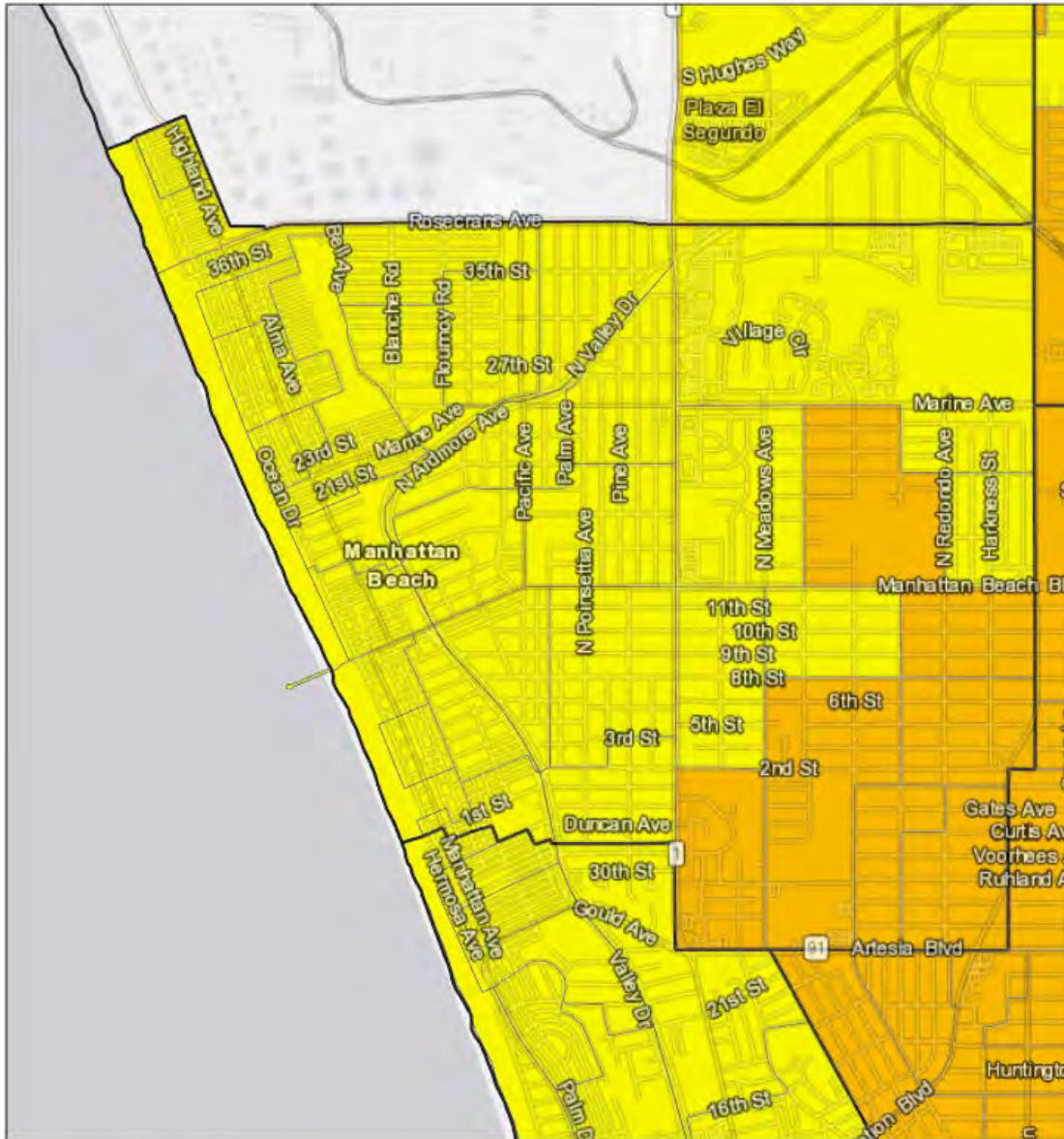
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Figure 2. City Racial Demographics (2018)





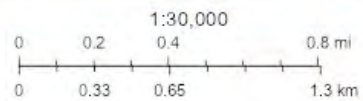
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City/Town Boundaries

(A) Racial Demographics (2010) - Block Group

≤20%

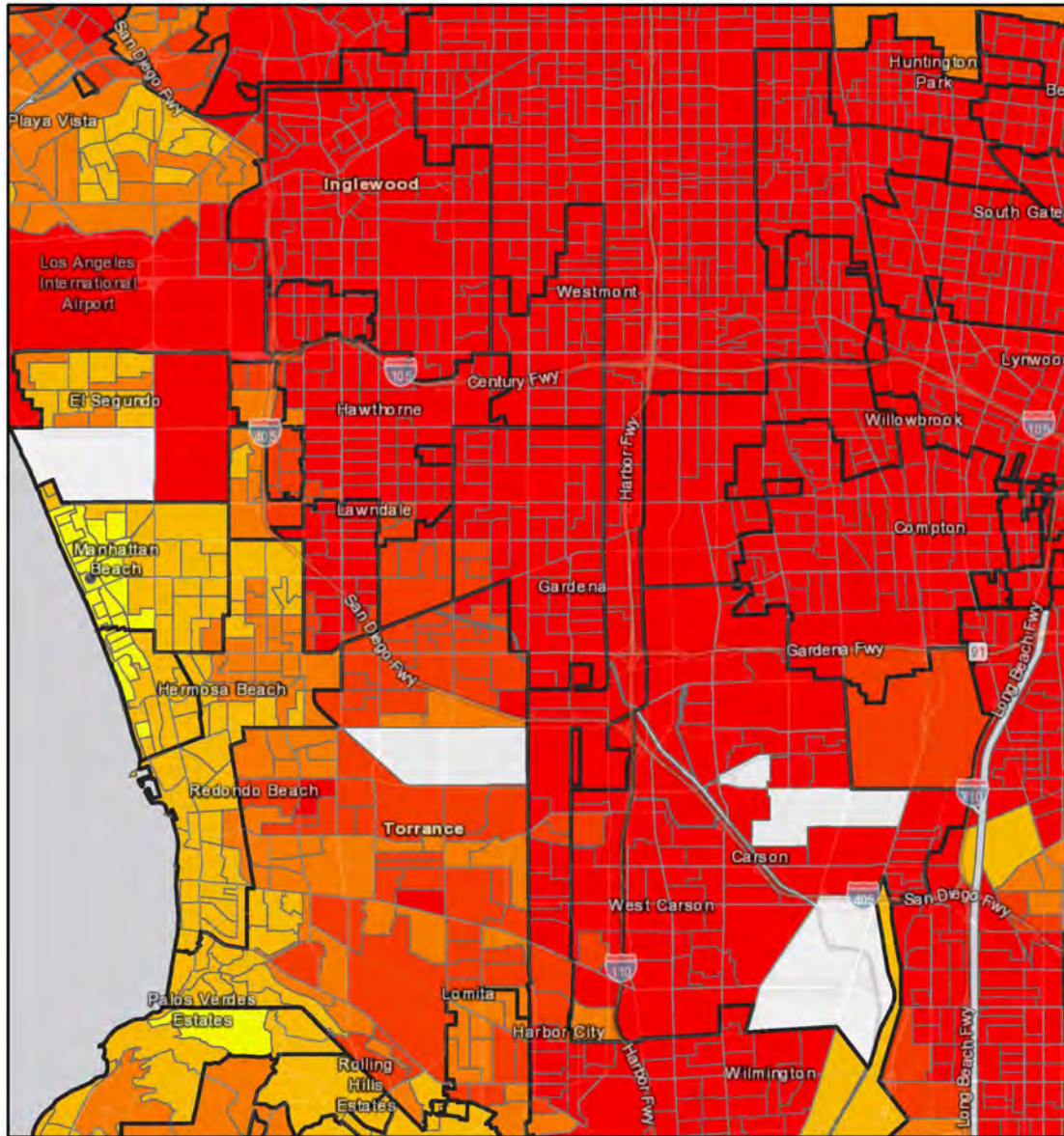
21 - 40%



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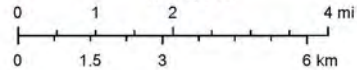
Figure 3. City Racial Demographics (2010)



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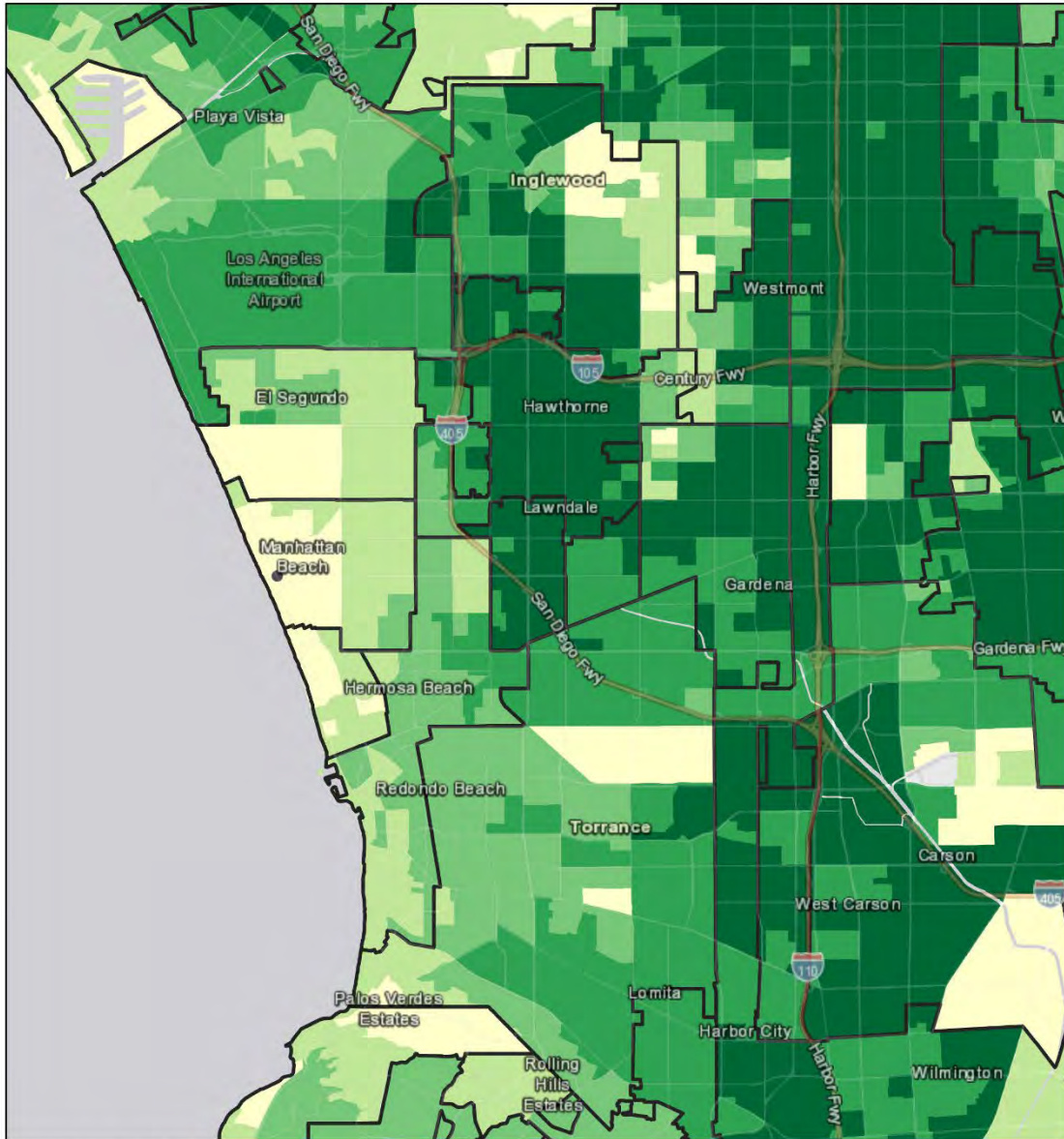
-  City/Town Boundaries
- (R) Racial Demographics (2018) - Block Group
-  ≤ 20%
-  21 - 40%
-  41 - 60%
-  61 - 80%
-  > 81%



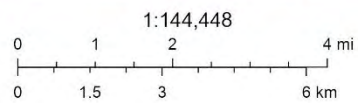
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Figure 4. Regional Racial Demographics



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CA HCD

Figure 5. Diversity Index

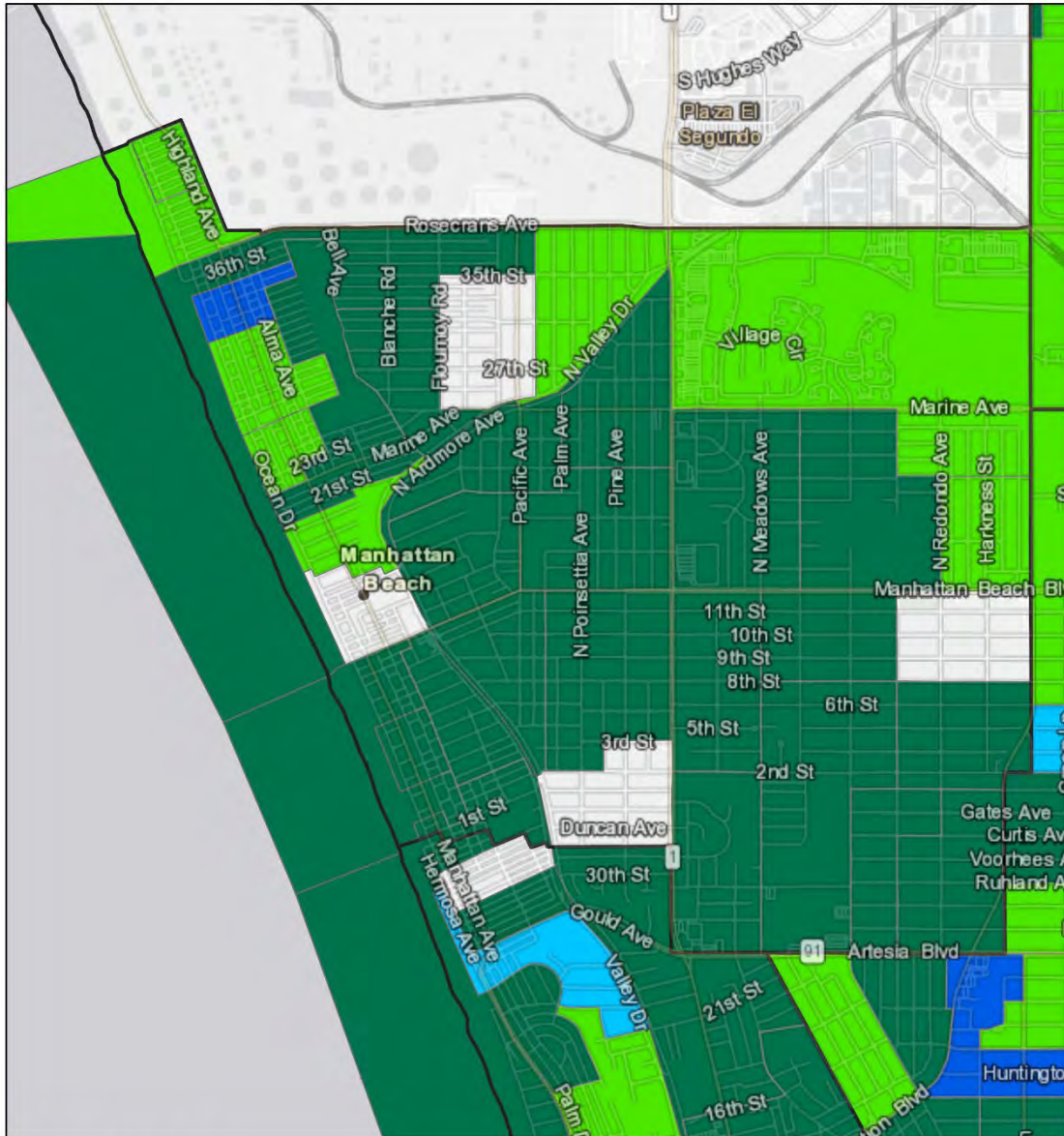
### 4.2.3 Household Income

Discriminatory housing practices of the past, such as redlining, restrictive zoning, urban renewal, and steering, while illegal today, have led to a disproportionate gap in household wealth based on race and ethnicity, especially between Black and White households.<sup>6</sup> Fair housing choice can be impacted by relationships among household income, household type, race/ethnicity, and other factors that create misconceptions, biases, and differential treatments. Because household income is also one of the most important factors for determining a household's ability to balance housing costs with other basic life necessities, this section will analyze median household income and identify any patterns of income and racial segregation at the local and regional levels.






**Figure 6, City Median Income (2015-2019)**, shows the varying median income levels in the City, and indicates that most households have a median income greater than the 2020 State median income of \$87,100. As a point of comparison, the City's median household income is \$153,023, and the County median household income is \$68,004. Households with median incomes greater than \$125,000 are located throughout the City but make up the majority in the central and southern areas of the City. Households with a median income of less than \$125,000 but greater than \$87,100 are located in the northern areas of the City. One block group in the northwest corner of the City, near Highland Avenue and 36th Street, indicates a median income of less than \$87,100 but greater than \$55,000. When compared to the previous five years as shown in **Figure 7, City Median Income (2010-2014)**, household median income throughout the City has generally been greater than \$100,000, indicating little change over time. However, the household median income has been decreasing to less than the 2020 State median income in small pockets of neighboring cities. This may be caused by the changing household demographics in neighboring cities in the past five years. Although there are no major local patterns of income segregation, the City has a high number of moderate- to above moderate-income households when compared to the South Bay and Gateway Cities areas, as shown in **Figure 8, Regional Median Income**. **Figure 8** indicates a clear separation of income groups between the coastal and relative inland cities. East of the City, cities such as Lawndale and Torrance have a mix of incomes and a greater population of lower-income households. At a regional level, there is a spatial trend in some areas that have a high concentration of non-White populations and lower-income households (see **Figure 6 and Figure 8**).

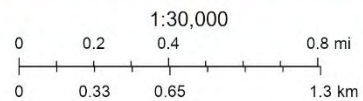
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<sup>6</sup> <https://www.americanprogress.org/issues/race/reports/2019/08/07/472617/systemic-inequality-displacement-exclusion-segregation/>



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-  City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group
  -  < \$55,000
  -  < \$87,100 (HCD 2020 State Median Income)
  -  < \$125,000
  -  Greater than \$125,000



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Figure 6. City Median Income (2015-2019)



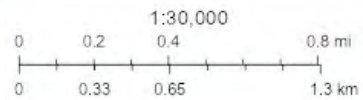
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City/Town Boundaries

(A) Median Income (ACS, 2010-2014) - Tract

<100,000

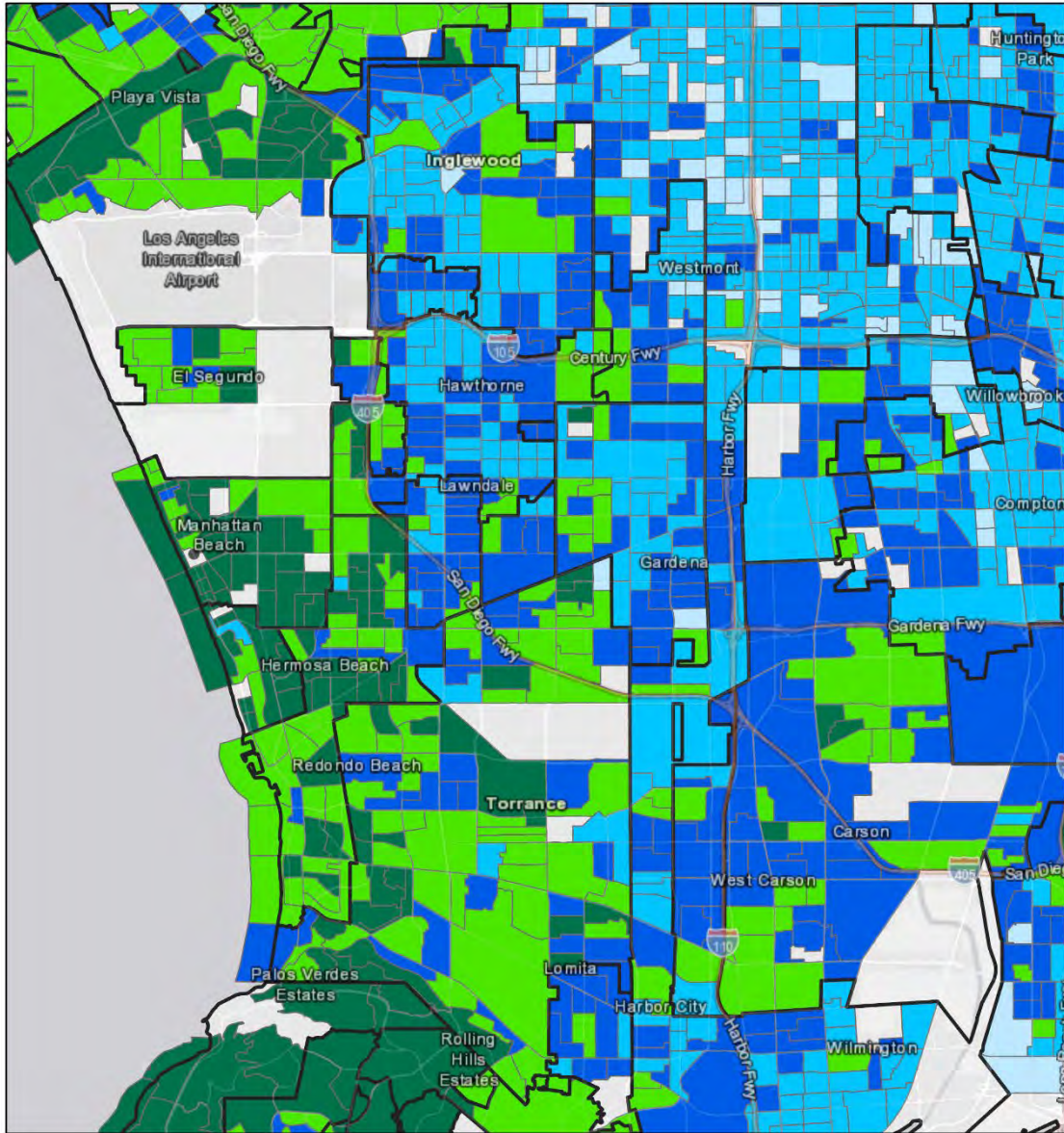
Greater than \$100,000



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




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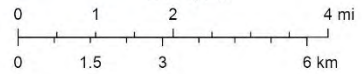
Figure 7. City Median Income (2010-2014)



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-  City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group
-  < \$30,000
-  < \$55,000
-  < \$87,100 (HCD 2020 State Median Income)
-  < \$125,000
-  Greater than \$125,000



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

Figure 8. Regional Median Income

#### 4.2.4 Familial Status

Familial structures can impact the care of children, type of housing needed, financial needs, and more. For example, single-parent households generally require more support for childcare than married or cohabitating couples, which can impact the jobs available to parents, income levels, and the amount of support afforded to children. Large families also have a special set of obstacles, such as fewer options or access to adequately sized and affordable housing. According to the HCD, past exclusionary zoning policies have led to discriminatory effects on protected characteristics such as race, disability, and familial status.<sup>7</sup> Family structure has evolved over time in the United States, with fewer couples marrying and cohabitation occurring more often. Families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some rental owners may charge larger households a higher rent or security deposit. And according to a 2016 study by HUD, compared to households without children, households with children were shown slightly fewer units and were commonly told about units that were slightly larger, and as a result, slightly more expensive to rent.<sup>8</sup> Therefore, this section will analyze patterns or trends of segregation or integration related to familial status at the local and regional levels.

**Figure 9, Population Living Alone**, indicates that there is a low percentage of the population 18 years and older in households living alone at the tract level. The majority of the City, and region, shows less than 20 percent of the population 18 years and older living alone. There is one tract in the northwest corner of the City where approximately 40 percent to 60 percent of the population lives alone. It can be expected that the population living alone is a lower percentage as the cost of living in the region is unfeasible for many with single incomes. In contrast, **Figure 10, Population Living with a Spouse**, shows the majority of tracts within the City have approximately 60 percent to 80 percent of its population 18 years and older who live with a spouse. When compared to the region, the City is one of the few cities that have a percent of population 18 years or older living with a spouse that is over 60 percent. Similarly, most coastal cities have a proportion of the population 18 years or older living with a spouse that is 40 percent to 60 percent. However, less than 40 percent of the population of inland and Gateway cities are 18 years and over live with their spouse. **Figure 11, Children in Married-Couple Households**, and **Figure 12, Children in Single-Headed Households**, show the percentage of children in married-couple and single-headed households at the tract level. **Figure 11** indicates that most of the tracts in the City and coastal cities have high percentages, 60 percent to 80 percent and greater than 80 percent, of children in married-couple households, and cities east of the coastal areas have lower (20 percent to 40 percent) and moderate (40 percent to 60 percent) percentages of children in married-couple households. **Figure 12** indicates that the majority of the City has less than or equal to 20 percent of children who live in single-headed households; other coastal cities show a similar trend, and cities to the east indicate low (20 percent to 40 percent) to moderate (40 percent to 60 percent) percentages of children in single-headed households, with pockets

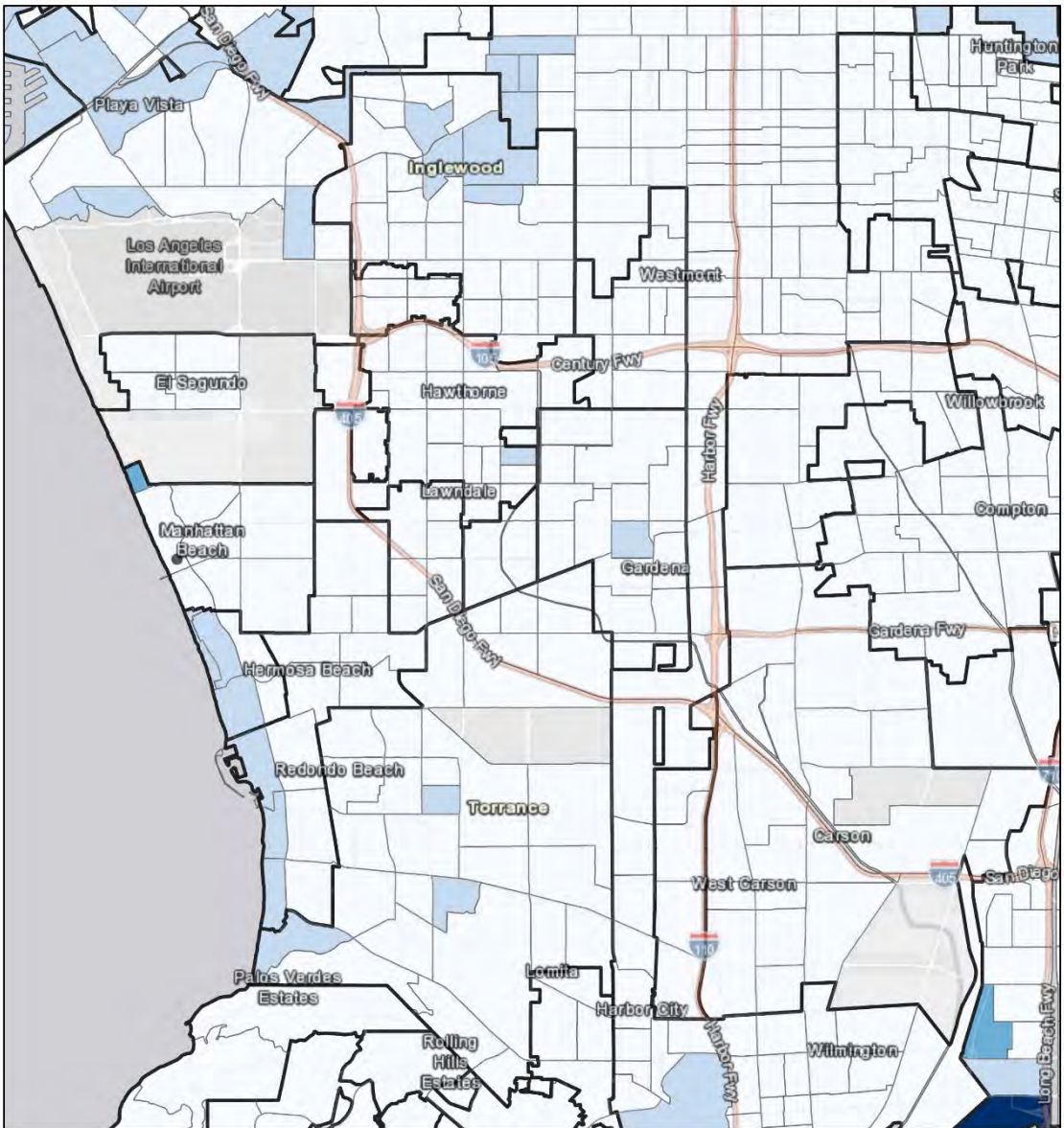
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<sup>7</sup> [https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf)

<sup>8</sup> <https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf>



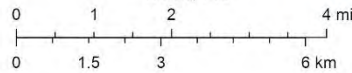
of higher percentages (60 percent to 80 percent) in Inglewood and Playa del Rey–Westchester, located north of the Los Angeles International Airport (LAX).



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City/Town Boundaries

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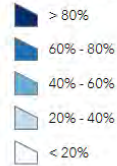
**Legend**

City/Town Boundaries



(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

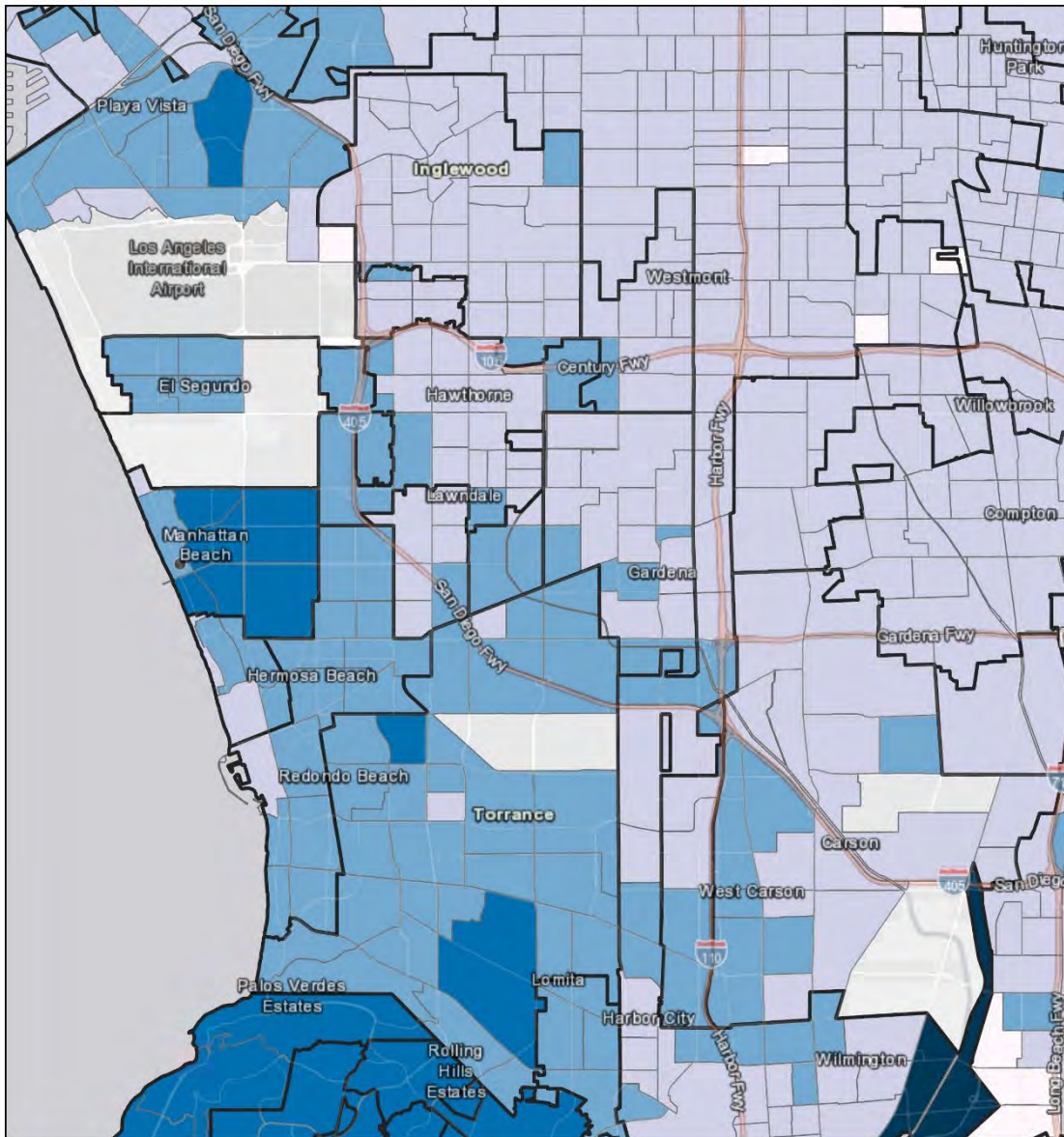
Percent of Population Over 18 Living Alone



CA HCD

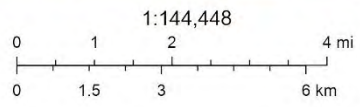
City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

Figure 9. Population Living Alone



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City/Town Boundaries



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**Legend**

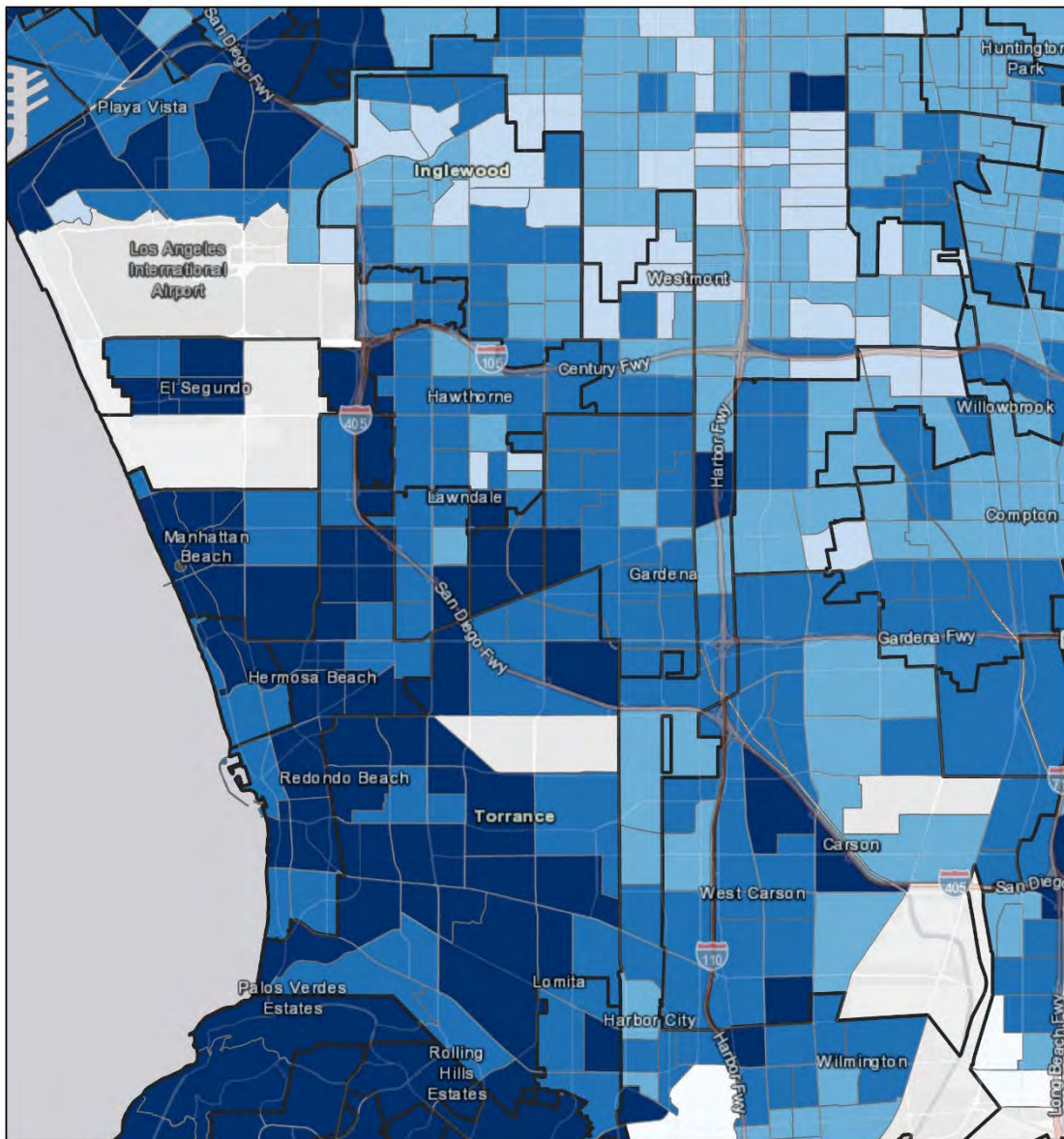
City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract



City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

Figure 10. Population Living with a Spouse



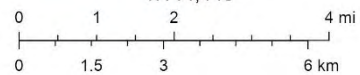
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City/Town Boundaries

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

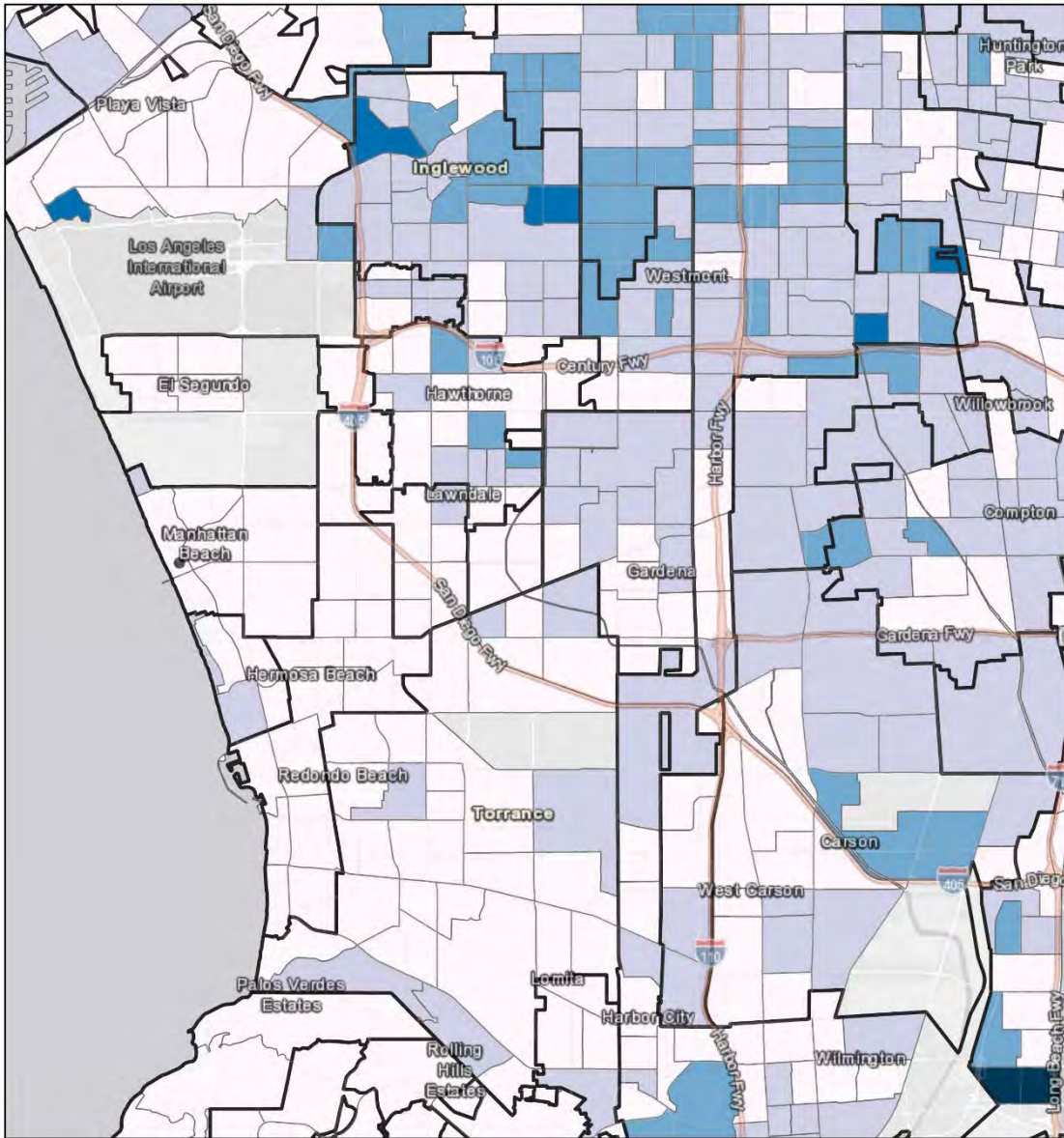
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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CA HCD  
City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

Figure 11. Children in Married-Couple Households



**Legend**

City/Town Boundaries

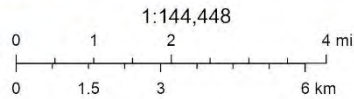
(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

Percent of Children in Female Householder, No Spouse/Partner Present Households

- > 80%
- 60% - 80%
- 40% - 60%
- 20% - 40%
- ≤ 20%

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City/Town Boundaries



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CA HCD

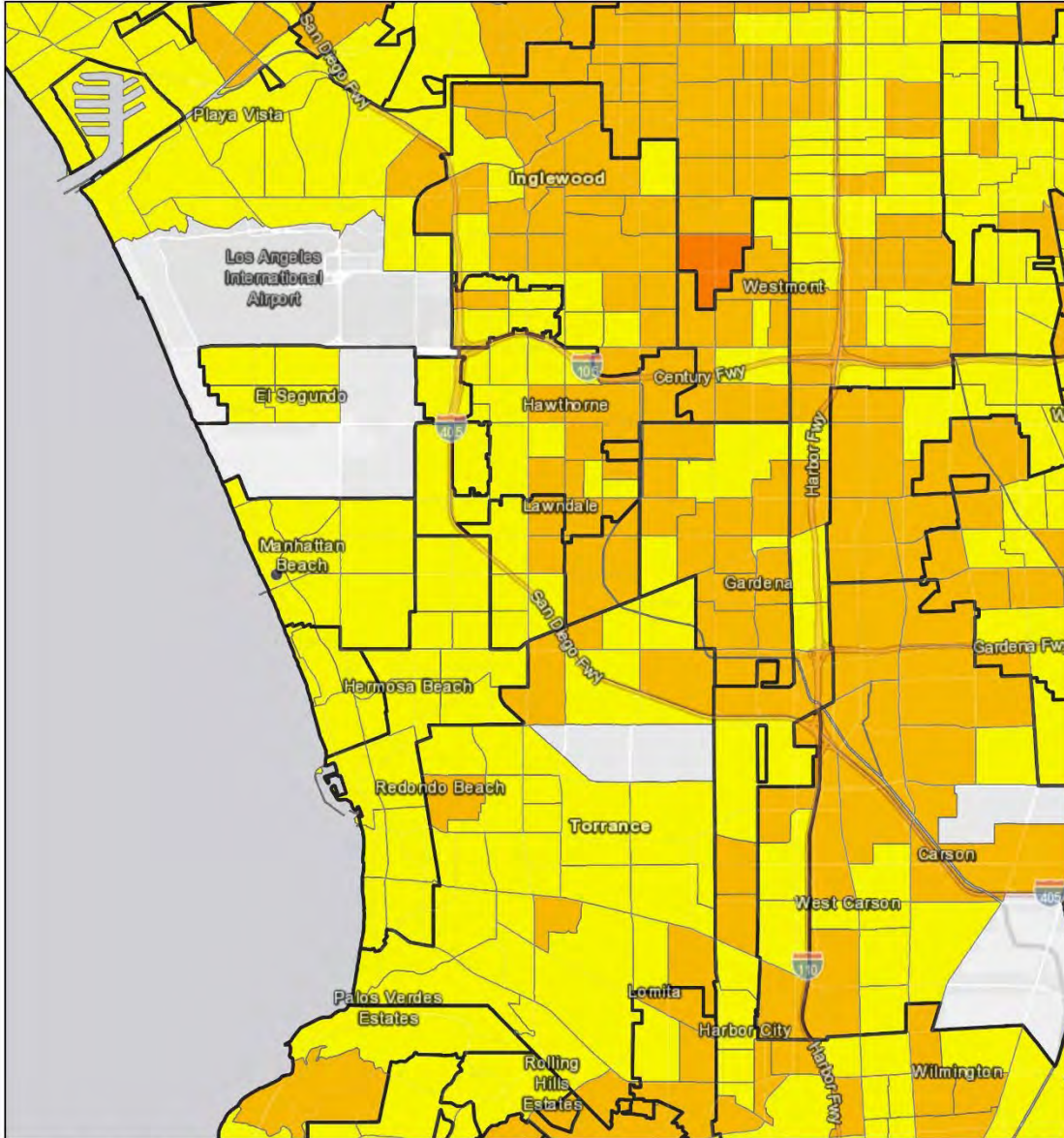
City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

Figure 12. Children in Single-Headed Households

#### 4.2.5 Persons with Disabilities

Persons with disabilities can often experience discrimination in the housing process, or difficulties navigating certain dwelling units or areas. Fair housing choice for persons with disabilities can be compromised based on the nature of a person's disability. Disability types include individuals with hearing, vision, cognitive, ambulatory, self-care, or independent living difficulties. Persons with physical disabilities may face discrimination in the housing market because of the need for home modifications to improve accessibility or other forms of physical assistance. Persons with developmental disabilities or mental disabilities includes cerebral palsy, epilepsy, autism, and other conditions related to intellectual disability. Persons with a mental disability may also face discrimination in the housing market because of stigma around mental disabilities. For example, rental owners may refuse to rent to tenants with a history of mental illness. Another example of housing discrimination is neighborhood opposition to public or private facilities, which impacts people with developmental disabilities seeking a community residential facility. According to California Welfare and Institutions Code Section 4900(e), a "facility" means a public or private facility, program, or service provider providing services, support, care, or treatment to persons with disabilities, even if only on an as-needed basis or under contractual arrangement. This includes a hospital; a long-term health care facility; a community living arrangement for people with disabilities, including a group home; a board and care home; an individual residence or apartment of a person with a disability where services are provided; a day program; a juvenile detention facility; a homeless shelter; a facility used to house or detain persons for the purpose of civil immigration proceedings; and a jail or prison, including all general areas, as well as special, mental health, or forensic units.




According to population disability data available through the U.S. Census Bureau's American Community Survey, 5-Year Estimates, 2015–2019, the percent of the population with a disability, including a developmental disability, is less than 10 percent throughout the City, with no specific area of concentration, as seen in **Figure 13, Population with a Disability**. An analysis of patterns over time for those with a disability shows that the 2010-2014 Census data also reflects less than 10 percent of the City's population across all tracts of the City has a disability, indicating no change over the 9-year period. This is a fairly low number compared to the region, where the population with disabilities can be up to 20 percent in inland South Bay and Gateway cities. According to Appendix B, the most common disability in the City for ages 5 to 17 is cognitive disability, accounting for 1.2 percent of that population. Among the population ages 18 to 64, cognitive disability was also the most common disability, followed by visual disability. In the 65 and older age category, the most common disability was independent living at 12.8 percent, followed by a hearing disability at 10 percent, and ambulatory disability at 9.9 percent. Please see Appendix B for disability classifications. At a regional scale, abutting cities also have 10 percent or less of their population with a disability. The City of Torrance and other cities to the east have a higher population, of 10 percent to 20 percent; tracts in Inglewood and Westmont have a relative high population, with a disability at 20 percent to 30 percent.

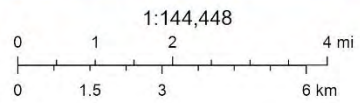


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 City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

-  < 10%
-  10% - 20%
-  20% - 30%



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

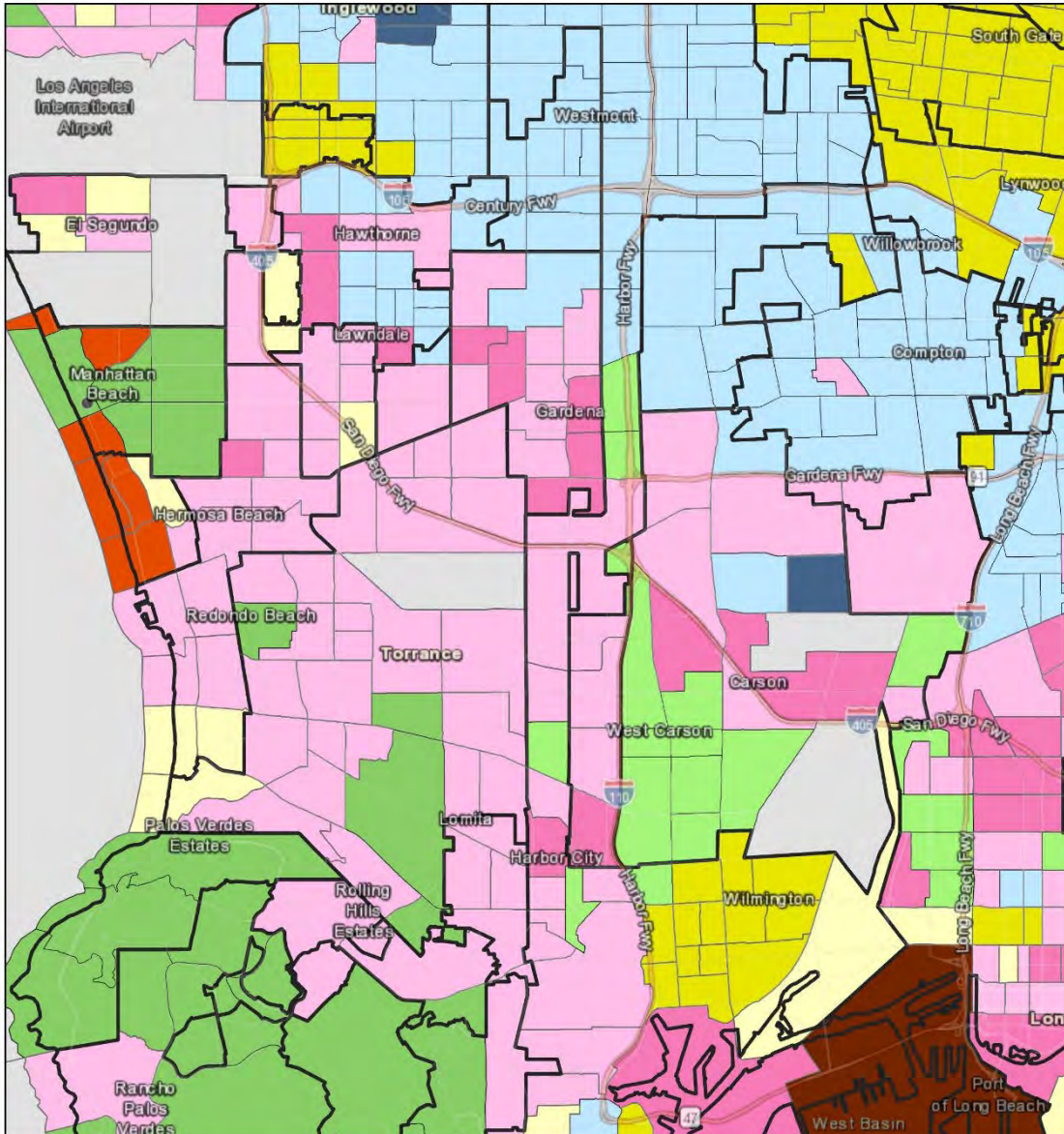
#### 4.2.6 Neighborhood Segregation

Typologies in **Figure 14, Neighborhood Segregation**, identify which racial or ethnic groups have more than 10 percent representation within the given tract. **Figure 14** shows that the majority of the City is occupied by an Asian–White population, and areas to the northwest and southwest of the City are occupied by a mostly White population. There are no diverse tracts identified in the region; however, to the east of the City, the map indicates there are various races/ethnicities, such as Black, White, Asian, or Latinx, making up 10 percent or more of the tract’s population. A “3 Group Mix,”<sup>9</sup> displayed as a light shade of pink in the figure, indicates that there is a mix of three races/ethnicities, and a “4 Group Mix,” displayed as a darker shade of pink, indicates there is a mix of four races/ethnicities. The mix of race and ethnicity in these groups may vary from the aforementioned racial/ethnic groups. Although there are pockets of mixed races, such as Latinx–White, to the south, east, and north of the City, the map also indicates there is a large Black–Latinx community to the east, specifically in the Inglewood and Westmont areas.

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<sup>9</sup> “Mix” of races indicates there are three or four racial/ethnic groups that have more than 10 percent representation within the given tract.

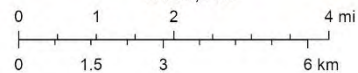




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- City/Town Boundaries
- Latinx-White
- Asian-Latinx
- Mostly Latinx
- Asian-White
- Mostly White
- Black-Latinx
- Mostly Other
- Mostly Black
- 3 Group Mix
- Unpopulated Tract
- 4 Group Mix

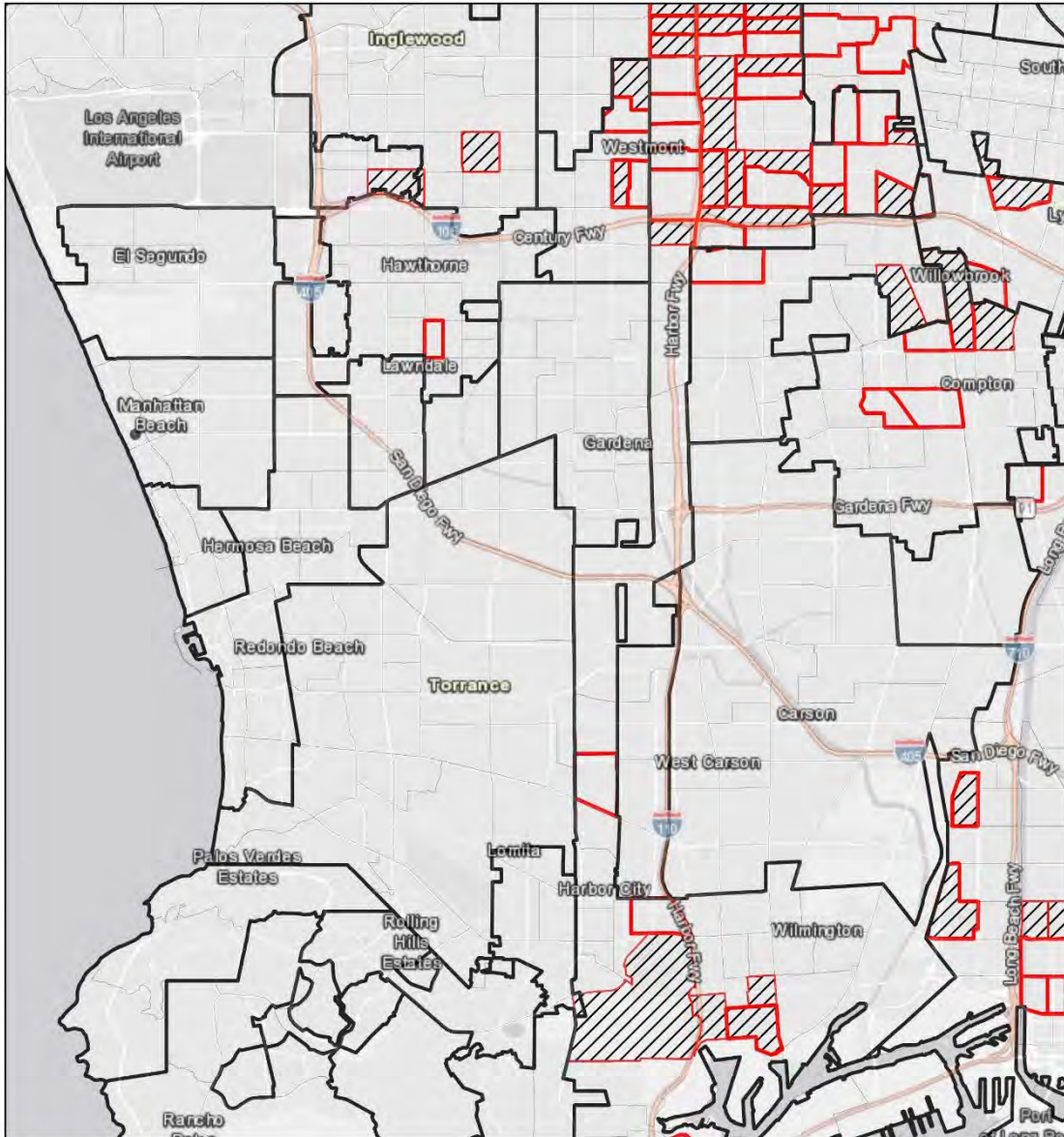


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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | CA HCD

### 4.3 Racially or Ethnically Concentrated Areas of Poverty

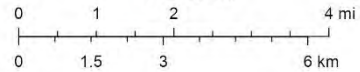
Racially or ethnically concentrated areas of poverty (R/ECAPs) are neighborhoods with concentrations of both poverty and singular races or ethnicities. These are generally Census tracts with a majority of non-White residents and a poverty rate of 40 percent-plus, or three times the average tract poverty rate for the County. In addition to highlighting historic discrimination, R/ECAPs also have lower economic opportunity in the present day. In the City, there are no R/ECAPs or areas of high segregation and poverty at the tract level, as determined by California Tax Credit Allocation Committee (TCAC) opportunity areas mapping analysis of 2021. **Figure 15, Regional R/ECAPs and High Segregation and Poverty**, shows that R/ECAPs and areas of high segregation and poverty are prevalent east of the City in the Gateway Cities region.



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- City/Town Boundaries
- (R) TCAC Area of High Segregation and Poverty (2021) - Tract



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CA HCD  
 City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

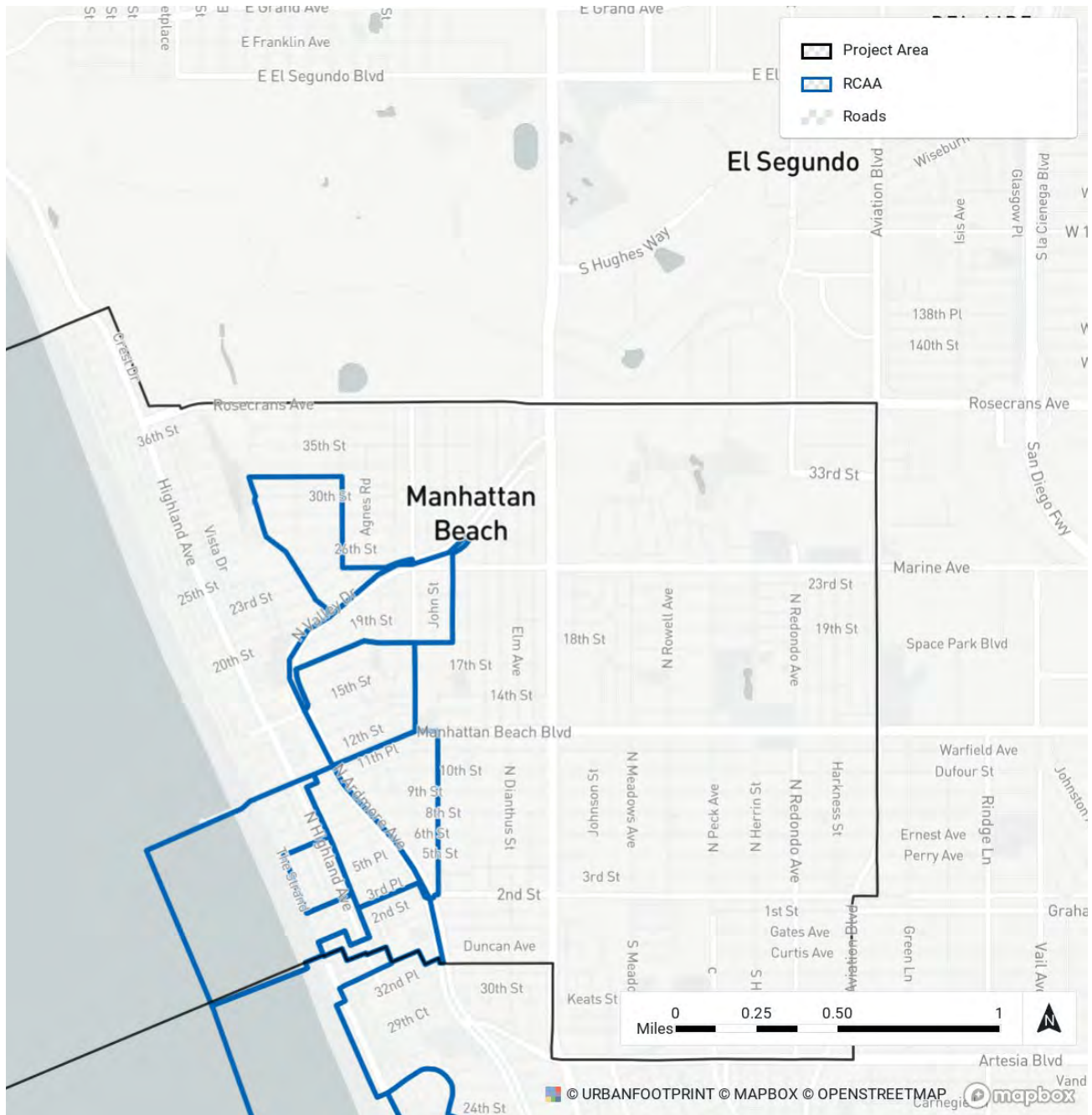
## 4.4 Racial Concentrations in Areas of Affluence

In contrast to R/ECAPs, racially concentrated areas of affluence (RCAAs) are those areas with higher incomes and concentrations of White residents. These are areas where 80 percent or more of the population is White, and the median household income is \$125,000 or more. The RCAA mapping data is not available in the HCD AFFH Data Viewer mapping tool. Therefore, the analysis uses Census data and selected 2019 American Community Survey estimates to identify block groups that meet the RCAA criteria. As shown in **Figure 16, Racially Concentrated Areas of Affluence**, there are several block groups west of Sepulveda Boulevard that are considered an RCAA. The RCAA in the City is generally bound by Rosecrans Avenue to the north and Duncan Avenue to the south; the western and eastern boundaries vary throughout. South of Manhattan Beach Boulevard, the RCAA is generally bound by Pacific Avenue to the east and the Pacific Ocean to the west. North of Manhattan Beach Boulevard and south of Marine Avenue, the RCAA is generally bound by Palm Avenue to the east and N. Valley Drive to the west. North of Marine Avenue and south of Rosecrans Avenue, the RCAA is generally bound by Flornoy Road to the east and Ocean Drive to the west. Local land use decisions that may have contributed to RCAAs includes the lack of regulations that historically allowed for mansionization of homes in the City. Mansionization occurs when large homes replace historically small homes, on consolidated and standard sized lots, appearing out of scale and result in an impression of unrelieved building bulk, screening out light and air and dwarfing existing standard sized buildings in a neighborhood. The consolidation of lots for mansionization has created an inefficient use of land for homes that can only be afforded by affluent households, diminishing capacity in already low-density areas. **Program 23, Preserving Housing Capacity**, details the City's efforts to avoid further mansionization

At a regional scale, some coastal cities, such as Hermosa Beach, Redondo Beach, and Palos Verdes Estates, also have block groups that meet the RCAA criteria (see **Figure 17, Regional Racially Concentrated Areas of Affluence**). Areas north of the City, near Beverly Hills and West Hollywood, also have RCAA block groups. The location of households with a median income of \$125,000 or more along the California coast can be attributed to high land and building costs, as they are among the highest in the country.<sup>10</sup> According to the California Legislature's Nonpartisan Fiscal and Policy Advisor, Legislative Analyst's Office, California's coastal areas are building housing at a rate lower than the demand for housing, which is also contributing to high housing costs. The high cost of living in the City, and along the coast, may indicate why there is a concentration of residents with higher incomes.

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<sup>10</sup> <https://lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.aspx>





## 4.5 Patterns Over Time

### 4.5.1 Mortgage Loan Access

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. Lending policies and requirements related to credit history, current credit rating, employment history, and the general character of applicants permit lenders to use a great deal of discretion, and in the process, can deny loans even though the prospective borrower would have been an acceptable risk.

Like many regions throughout the United States, Los Angeles County has a history of excluding non-White people from the housing market through practices such as mortgage redlining. Mortgage redlining is a mapping exercise practiced in the 1930s by the Federal government's Home Owners' Loan Corporation that was used to guide mortgage-lending desirability in residential neighborhoods based on the racial and ethnic demographics of an area's population. Local real estate developers and appraisers assigned grades of A through D to residential neighborhoods that indicated the following:<sup>11</sup>

- A (Best): Always upper- or upper-middle-class White neighborhoods that the Home Owners' Loan Corporation defined as posing minimal risk for banks and other mortgage lenders, as they were "ethnically homogeneous" and had room to be further developed.
- B (Still Desirable): Generally, nearly or completely White, U.S.-born neighborhoods that the Home Owners' Loan Corporation defined as "still desirable" and sound investments for mortgage lenders.
- C (Declining): Areas where the residents were often working class and/or first- or second-generation immigrants from Europe. These areas often lacked utilities and were characterized by older building stock.
- D (Hazardous): These areas often received this grade because they were "infiltrated" with "undesirable populations," such as Jewish, Asian, Mexican, and Black families. These areas were more likely to be close to industrial areas and to have older housing.

Mortgage redlining made it difficult for people of color to access loans for homeownership because banks refused to lend to areas with the lowest grade. According to Home Owners' Loan Corporation maps from the 1930s, the western portion of the City was considered to be "Declining" with a C grade, and the southern and eastern boundaries were identified as "Hazardous," or D grade (see **Figure 18, 1930s Home Owners' Loan Corporation Map**). Studies link parts of cities historically labeled as Declining or Hazardous to have lower rates of economic mobility than those labeled as Best or Still Desirable.<sup>12</sup> However, this relationship is not applicable in the City because it has high access to opportunity (see **Section 4.6, Access to Opportunity**). Furthermore, present-day median home values in the City are relatively high, at \$2,923,949, according to the Zillow Home Value Index from August 2021. The median home value has increased 12.3 percent since the previous year (2020). The high concentration of White populations in the City today (**Figure 19, Predominant Population - White Majority Tracts**) shows that while the area may have once been more diverse, especially in those areas with a grade of D (**Figure 18, 1930s Home Owners'**

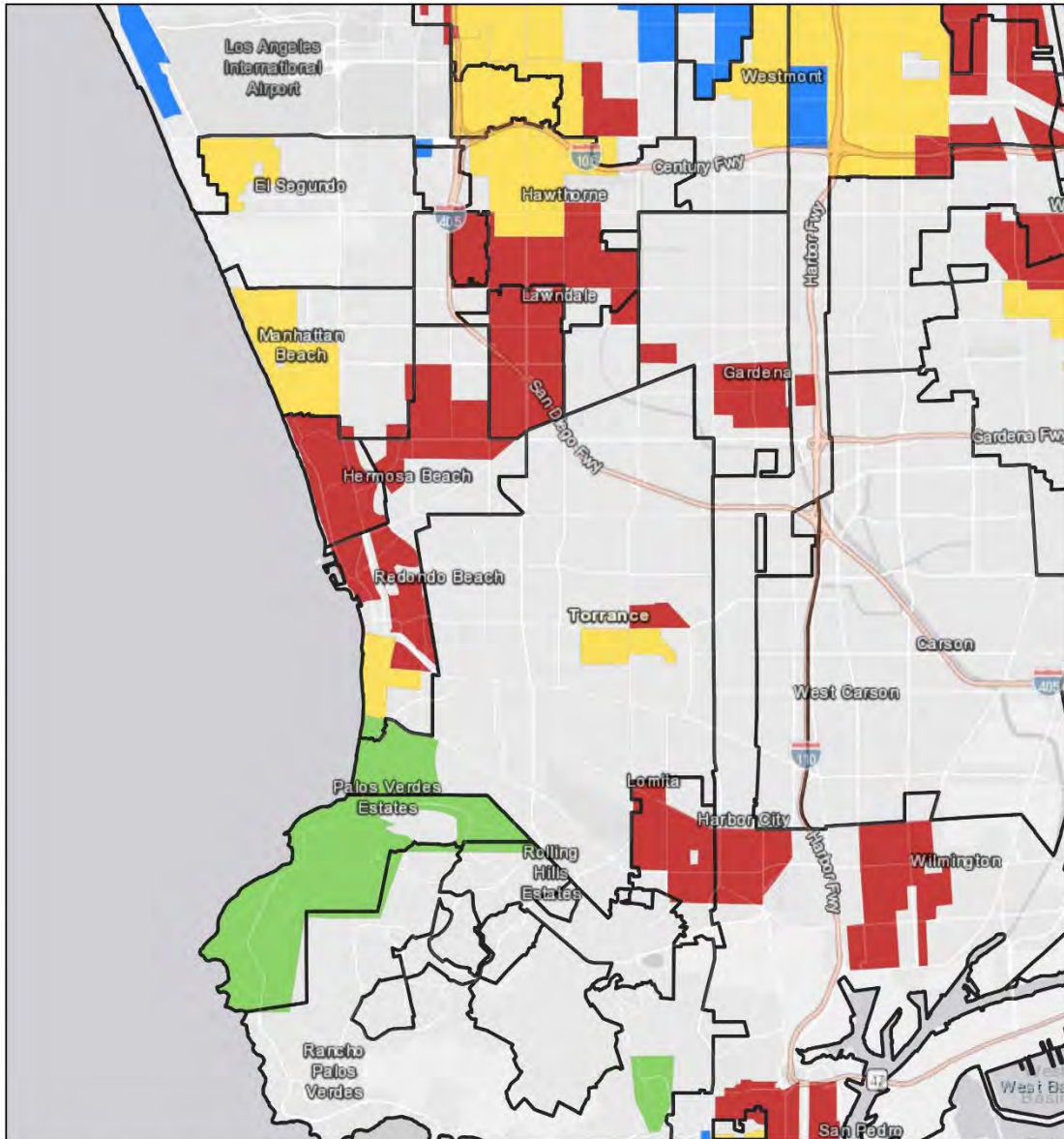
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<sup>11</sup> <https://dsl.richmond.edu/panorama/redlining/#loc=5/36.4571-88.242&advview=full&text=intro>

<sup>12</sup> <https://www.upforgrowth.org/news/legacy-redlining-lives-today-through-exclusionary-zoning>

**Loan Corporation Map**). The exclusion of access to home mortgages may have left many households displaced by households that had access to funds for homeownership without the need for loans, which could explain the majority of the White population in all tracts across the City. Additionally, when compared across the region, those tracts in cities along the coast have higher concentrations of White populations. Coastal communities are often more desirable and housing prices tend to be higher. The City also has a large percentage of households with moderate- and above moderate-incomes, relatively higher than most areas in the region (see **Figure 8**), and parts of the City are considered to be an RCAA, as identified in **Figures 16 and 17**.





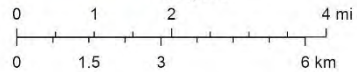
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City/Town Boundaries

(A) Home Owners Loan Corporation Redlining Grade (University of Richmond, 2021)

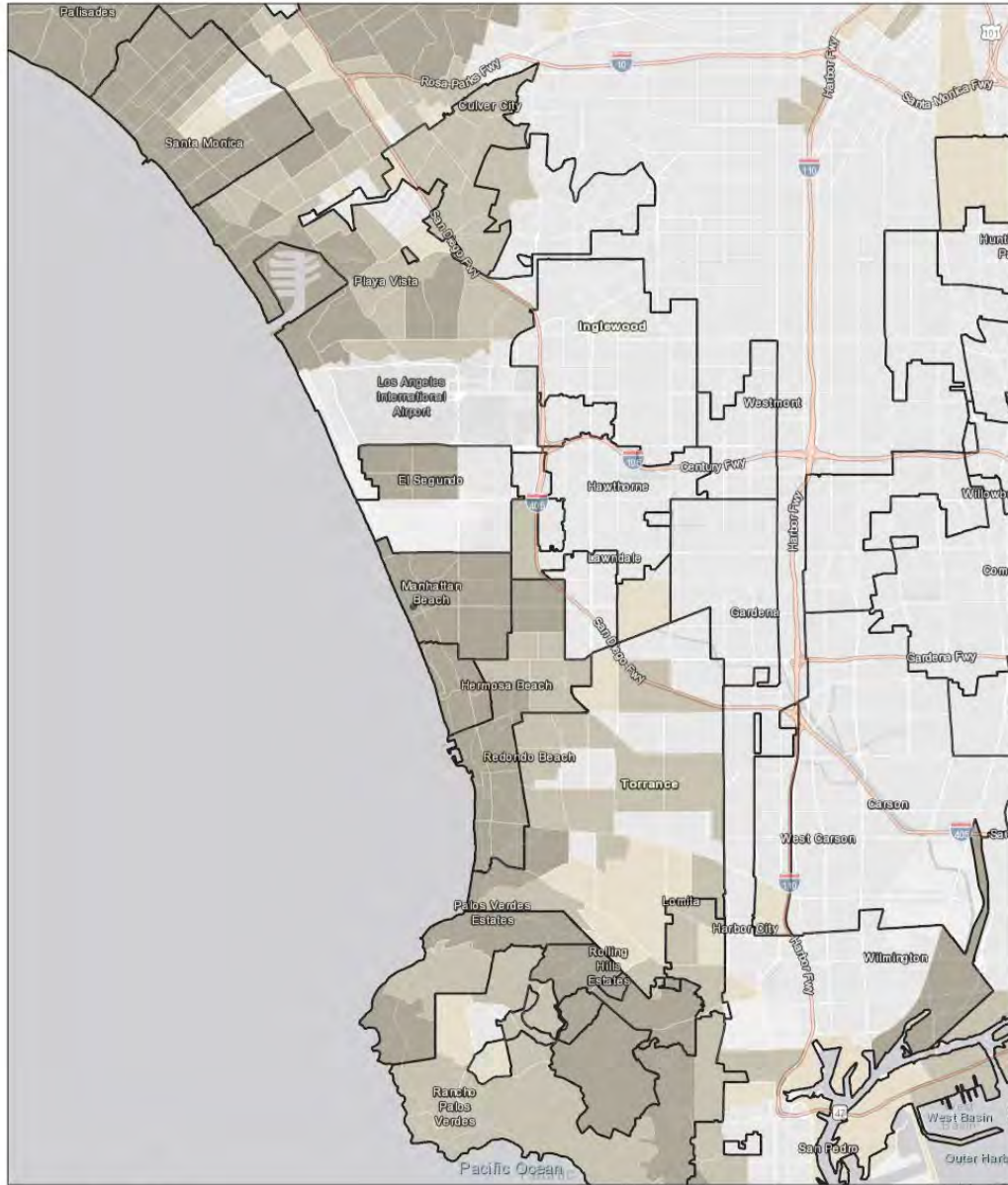
- A (Best)
- B (Still Desirable)
- C (Declining)
- D (Hazardous)



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Figure 18. 1930s Home Owners' Loan Corporation Map



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 City/Town Boundaries  
 (R) Predominant Population - White Majority Tracts  
 Slim (gap < 10%)  
 Sizeable (gap 10% - 50%)  
 Predominant (gap > 50%)

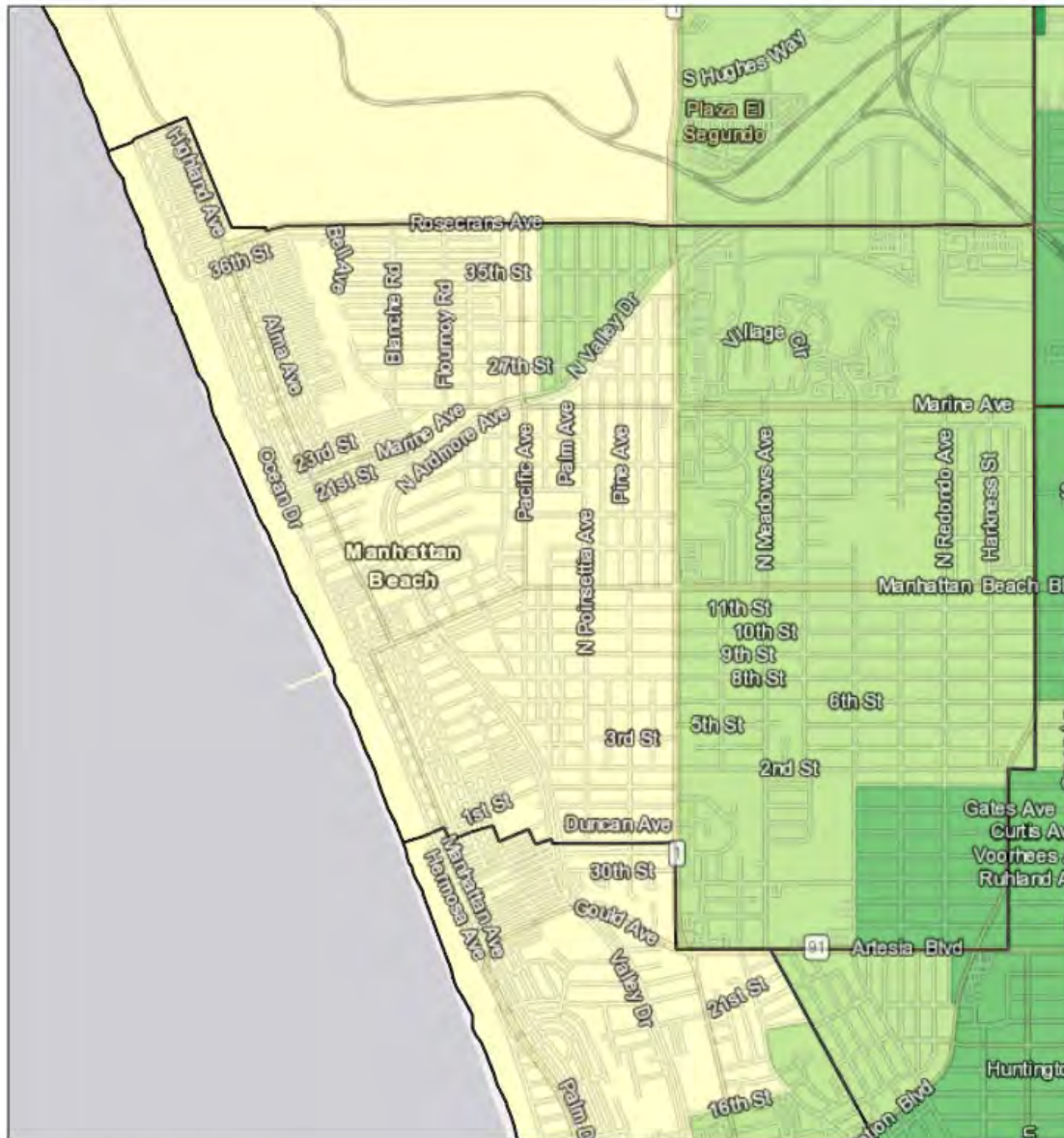
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 0 1.25 2.5 5 mi  
 0 2 4 8 km

Figure 19. Predominant Population – White Majority Tracts

## 4.5.2 Demographic Trends

According to the U.S. Census Bureau's American Community Survey 2019 data, the total population in the City is 35,058, which has remained stable, but with a slight decrease by about 0.22 percent from 2010 to 2021. Los Angeles County, in comparison, has grown 2.3 percent from 2010 to 2021. The racial and ethnic composition of the City differs from the County in that a lower proportion of City residents are Hispanic/Latino or other racial minorities. Approximately 73 percent of City residents are non-Hispanic White, contrasted with 26 percent for the County as a whole. The percentage of Hispanics residing in the City, at 8 percent, is significantly lower than that of the County, with 48 percent Hispanic/Latinx. Asians, at 13 percent, represent the largest non-Hispanic minority in the City. Appendix B provides additional data and analysis of the demographic patterns within the City.

**Figure 20, Diversity Index (2010)**, shows the diversity index of the City by Census block group in 2010. Block groups east of Sepulveda Boulevard have a diversity index of 40 to 55, and an area to the southeast has a higher index of 55 to 70. Block groups west of Sepulveda Boulevard have the lowest diversity. In 2018, as shown in **Figure 21, Diversity Index (2018)**, diversity in the City increased. Specifically, along Rosecrans Avenue where the diversity index is now 40 to 55 and in the southeast where it is 55 to 70 between Artesia Boulevard and 8th Street. As evident by data and maps discussed in **Section 4.2.2, Race and Ethnicity**, patterns over time indicate that the population of cities east of Manhattan Beach are becoming increasingly diverse and non-White. At the City scale, this can clearly be seen at the fringes of the eastern borders of the City. It can be expected that this pattern of increased diversity will continue over time.



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City/Town Boundaries

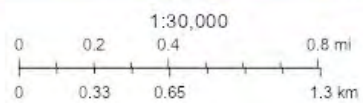
(A) Diversity Index (2010) - Block Group

Lower Diversity

40 - 55

55 - 70

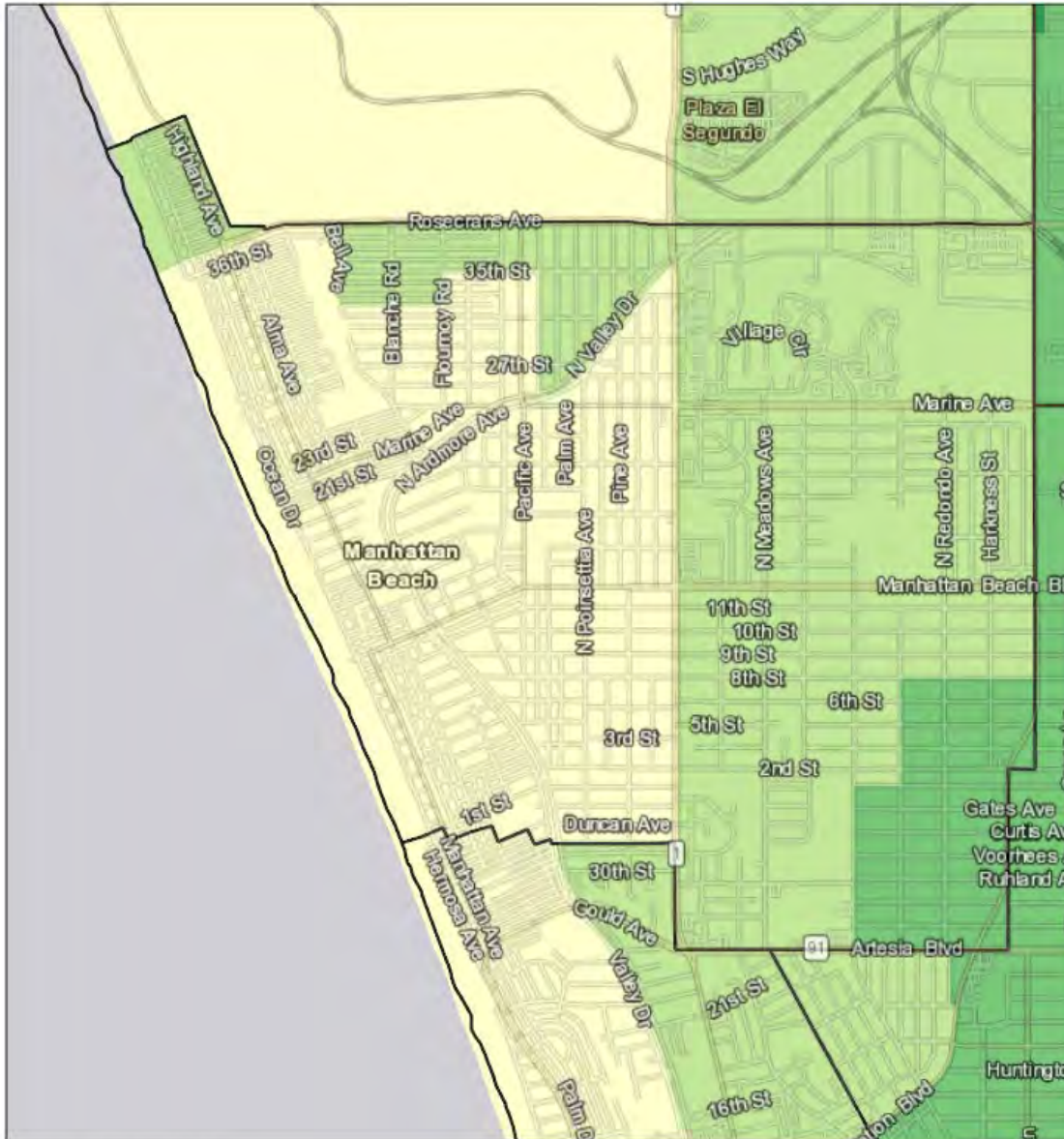
70 - 85



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City of Manhattan Beach, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 |

Figure 20. Diversity Index (2010)

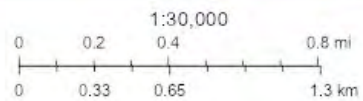


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City/Town Boundaries

(A) Diversity Index (2018) - Block Group

- Lower Diversity
- 40 - 55
- 55 - 70
- 70 - 85



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Figure 21. Diversity Index (2018)

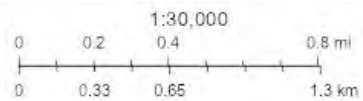
### 4.5.3 Poverty

**Figure 22, Poverty Status (2010-2014)**, provides the poverty status as a percent of total population in the City by Census tract. Poverty accounts for less than 10 percent of the City and surrounding areas, with the exception of a tract in the northwest of the City near Highland Avenue which is 10 percent to 20 percent of the total population. According to the most recent ACS Census data as shown in **Figure 23, Poverty Status (2015-2019)**, all tracts within the City have less than 10 percent of the total population with poverty status, indicating that poverty is not a primary concern for the City. Across the ten-year span, it can be assumed that the poverty status in the City will remain stable over time. Poverty trends are similar across coastal cities in the region where poverty increases further east. Income at the regional scale is further detailed in Section 4.2.3.



12/23/2021, 1:11:04 PM

- City/Town Boundaries
- (A) Poverty Status (ACS, 2010 - 2014) - Tract
- < 10%
- 10% - 20%





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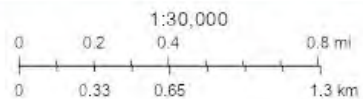
City of Manhattan Beach, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | CA HCD

Figure 22. Poverty Status (2010-2014)



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-  City/Town Boundaries
- (R) Poverty Status (ACS, 2015 - 2019) - Tract
-  < 10%



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City of Manhattan Beach, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 |

Figure 23. Poverty Status (2015-2019)



## 4.6 Access to Opportunity

Lower-income housing and racially segregated communities are disproportionately impacted by a combination of locational factors, such as proximity to landfills, freeways, industrial areas, and other toxins and pollutants. Recent studies have shown that the distribution of affordable housing has been disproportionately developed in minority neighborhoods with poor environmental conditions and high poverty rates, thereby reinforcing poverty concentration and racial segregation in low-opportunity and low-resource areas.<sup>13</sup>

Affordable housing in high-opportunity/high-resource areas provide low-income residents access to resources such as quality schools, employment, transportation, low poverty exposure, and environmentally healthy neighborhoods. Research indicates that among various economic and social factors, being in proximity to certain amenities can encourage positive critical life outcomes.<sup>14</sup> There has been an increased focus in deconcentrating poverty and promoting affordable housing in high opportunity areas. This trend is evident in the states' allocation of Low-Income Housing Credit dollars—the primary subsidy that is available for developing and preserving affordable housing. To allocate these credits, the California Housing Finance Agency developed a scoring system. In recent years, the scoring system has been adjusted to promote investment in affordable housing in areas with access to opportunity in the context of other affordable needs. Several agencies, including HUD and the HCD, in coordination with the California TCAC, have developed methodologies to assess and measure geographic access to opportunity (including education, poverty, transportation, and employment) in areas throughout California. The Opportunity Map created by the California TCAC and HCD (using data from 2020) is used to identify areas in the region with characteristics that are shown by research to support positive economic, educational, and health outcomes for low-income families, particularly long-term outcomes for children.

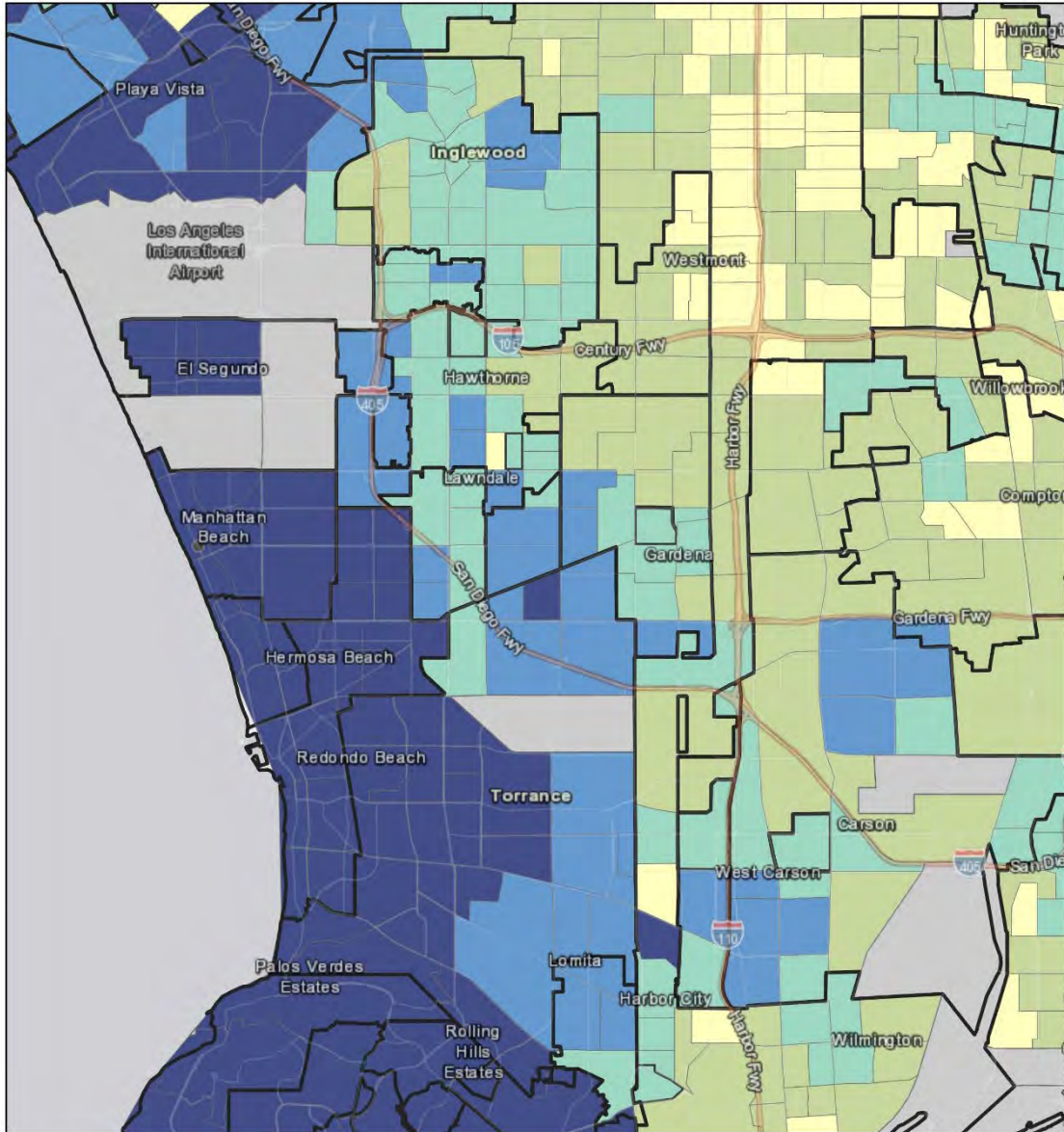
“High Resource” areas are those areas, according to research, that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. The primary function of the California TCAC is to oversee the Low-Income Housing Credit Program, which provides funding to developers of affordable rental housing. The Opportunity Map plays a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity. **Figure 24, Opportunity Map**, identifies the entire City as “Highest Resource”—a composite score that is created from scoring access to opportunity in relation to education, economic development, and the environment. As such, affordable and publicly owned housing can be distributed in virtually any area within the City. **Figure 24** indicates that coastal cities have a composite score of “Highest Resource.” However, toward the east, including Gateway Cities and some South Bay areas, cities have “High” composite scores, and inland areas toward downtown Los Angeles have “Moderate” and “Low” resource scores.

The following sections will review access to opportunity in relation to education, economic development, environment, and transportation, and access to opportunities for persons with disabilities at a local and regional scale.

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<sup>13</sup> [https://www.povertylaw.org/wp-content/uploads/2020/06/environmental\\_justice\\_report\\_final-rev2.pdf](https://www.povertylaw.org/wp-content/uploads/2020/06/environmental_justice_report_final-rev2.pdf)

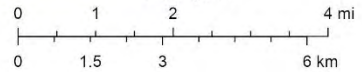
<sup>14</sup> Freddie Mac and the National Housing Trust. 2020. Spotlight on Underserved Markets: Opportunity Incentives in LIHTC Qualified Allocation Plans. [https://www.sahfnet.org/sites/default/files/uploads/resources/opportunity\\_incentives\\_in\\_lihtc\\_qualified\\_allocation\\_plans.pdf](https://www.sahfnet.org/sites/default/files/uploads/resources/opportunity_incentives_in_lihtc_qualified_allocation_plans.pdf)



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-  City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Composite Score - Tract
-  Highest Resource
-  High Resource
-  Moderate Resource (Rapidly Changing)
-  Moderate Resource
-  Low Resource



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CA HCD

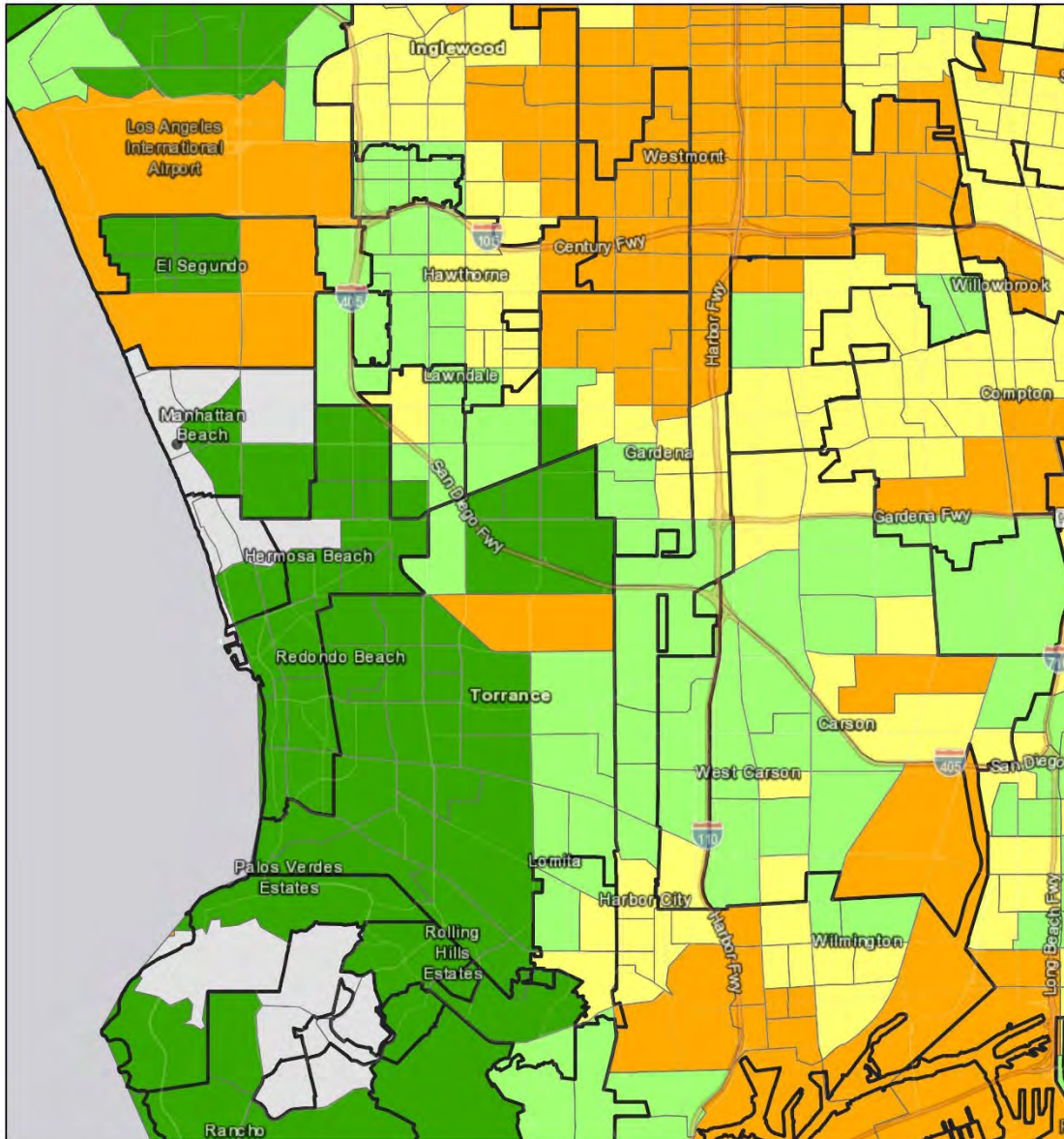
Figure 24. Opportunity Map

#### 4.6.1 Education

The TCAC Opportunity Area Access to Education analysis considers math and reading proficiency standards, high school graduation rates, and student poverty rates. **Figure 25, Access to Education**, shows that the City has more positive education outcomes, or a score of greater than 0.75. According to the Los Angeles County Office of Education, the Manhattan Beach Unified School District is responsible for public education in the City. There is one preschool, five elementary schools, one middle school, and one high school in the district. Areas of the City along the coast and in the northern portions do not have available data in **Figure 25**, however local knowledge indicates that there are two schools along the coast and two schools in the northeastern section of the City. Those areas with the highest educational outcomes correlate with those areas of the City that are most diverse and where there are higher concentrations of children in married couple households.

GreatSchools.org is an online resource that compiles local data on ratings from students, families, and staff to provide performance feedback for schools and quality ratings for review by current and prospective students, producing an overall rating for schools based on aspects of education such as equity, college preparedness, and variety in educational opportunity. Local data shows that Mira Costa High School is rated above average (9/10) according to GreatSchools.org. The median elementary school rating for the district is 9/10, with four schools rated 9/10 and one rated 7/10. The Manhattan Beach Unified School District has strong parental, community, and corporate support through Parent Teacher Associations, volunteering, and endowments from the Manhattan Beach Education Foundation. According to the Manhattan Beach Education Foundation website, the foundation is a community-driven fundraising organization that supplements State funding for programs that inspire learning, enrich teaching, and promote innovation and academic excellence in the public schools of Manhattan Beach.

At a regional level, coastal cities score in the more positive education outcomes range, and other South Bay and Gateway Cities areas to the east score in the less positive outcomes (less than 0.25) and moderate outcomes (0.25 to 0.50, 0.50 to 0.75) categories. The most concentrated area of less positive outcomes is in Westmont and the eastern areas of Inglewood, which are located northeast of the City. Areas north of the City that indicate less positive outcomes are the locations of LAX and the Chevron refinery.



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

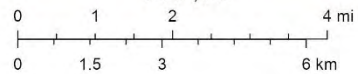
< 0.25 (Less Positive Education Outcomes)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Education Outcomes)

No Data



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

CA HCD

Figure 25. Access to Education

## 4.6.2 Economic

According to recent Census data, approximately 70 percent of the City’s working residents were employed in management and professional occupations. A low percentage of workers (less than 5 percent) were employed in service-related occupations such as waiters, waitresses, and beauticians. Blue collar occupations, such as machine operators, assemblers, farming, transportation, handlers, and laborers, constituted less than 5 percent of the workforce. In the Southern California Association of Governments region, approximately 34.2 percent of working residents were employed in management and professional occupations, followed by sales at 22.8 percent.

**Figure 26, Economic Opportunity**, shows the region’s access to economic opportunity considering the following indicators: poverty, adult education, employment, job proximity, and median home value. The City, along with other coastal cities, have a “more positive” TCAC Opportunity Area economic outcome score (greater than 0.75), and South Bay cities to the east have varying scores, including some tracts scoring less than 0.25, or “less positive” outcomes. Most Gateway Cities have a greater number of tracts indicating less-positive outcomes when compared to cities in the South Bay and Westside,<sup>15</sup> with the exception of the location of LAX and the Chevron refinery.

According to recent Census data, about 93 percent of employed City residents worked in Los Angeles County, but only 23 percent of all workers were employed within City limits. Additionally, local data shows that approximately 30% of Manhattan Beach residents in the workforce, work in the City of Los Angeles, while approximately 8% work in Manhattan Beach and nearly 8% in El Segundo. Approximately 67% of Manhattan Beach residents in the workforce earn more than \$3,333 per month. Access to economic opportunity in terms of proximity to jobs is shown in **Figure 27, Jobs Proximity**. **Figure 27** indicates that the City is in proximity to jobs and has an index score of greater than 80 (closest proximity) in the central and northern areas, and the southern boundary of the City has an above-moderate score of 60 to 80. The coastal cities, with the exception of Palos Verdes Estates, and other South Bay and Gateway Cities areas indicate closest proximity to jobs. Key industries in the South Bay are in aerospace, technology, global communications, medicine, military, and business application. In recent years, Westside and South Bay cities have seen an increase in startup and technology companies—such as Hulu, Postmates, Snapchat, and Google—establishing their headquarters or an office in the cities of Santa Monica, Playa Vista, Venice, and El Segundo. In addition to the aforementioned industries, other key industries in Los Angeles County include fashion, apparel, and lifestyle; food manufacturing; advanced transportation; information technology; trade and logistics; and marketing, design, publishing.<sup>16</sup>

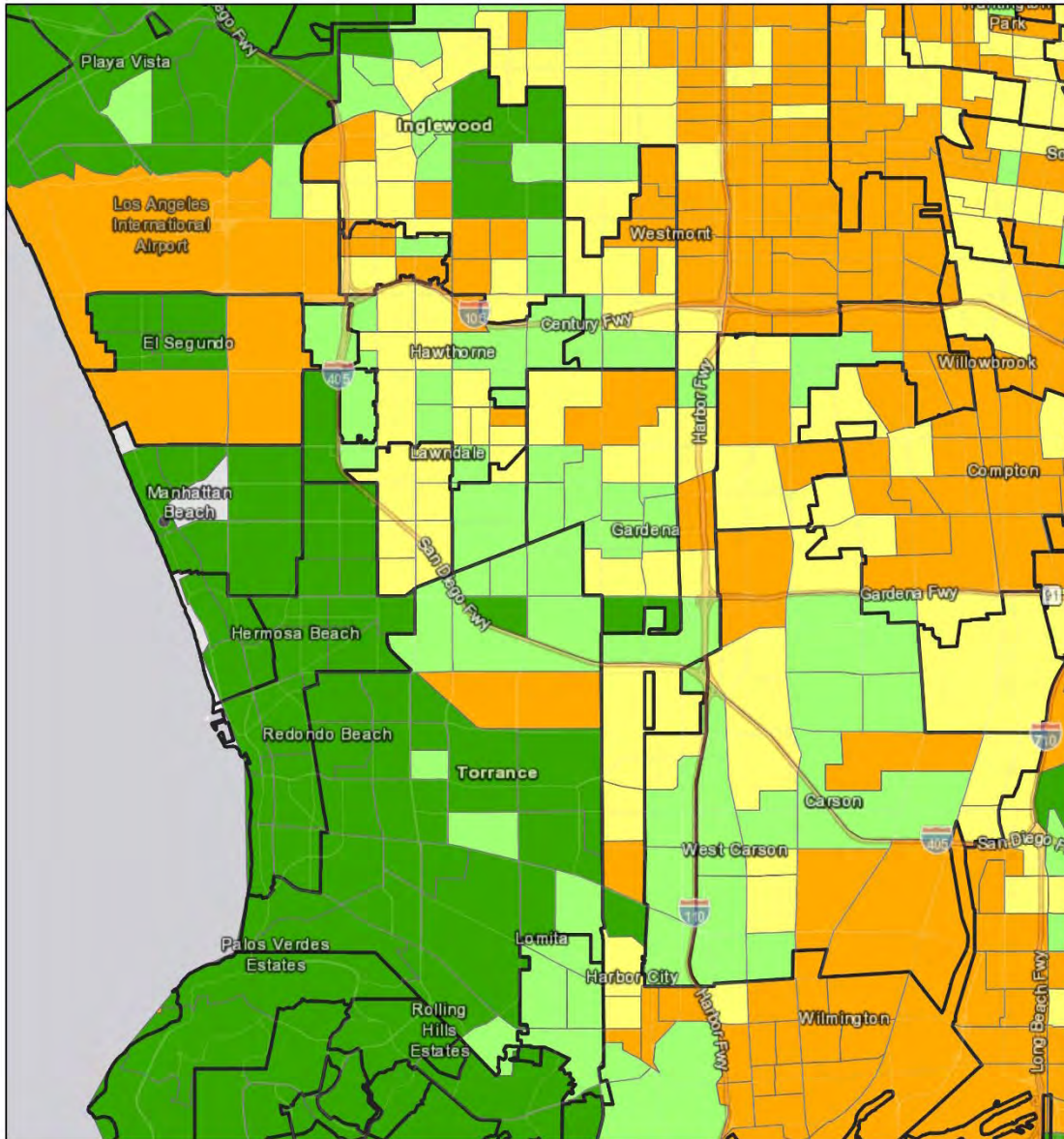
While the City has positive economic outcomes and close job proximity relative to other South Bay cities, a regionally scaled map provides context as to why this is. Better economic outcomes may correlate to higher median income, areas with significant White populations, and where non-single or married-couple households are prominent. This juxtaposes the lower economic outcomes of eastern South Bay, Westside, and Gateway cities where much of the population have a lower household median income, are significantly non-White, and are single income. Job proximity bears no correlation to the

---

<sup>15</sup> “Westside” is a local term used to reference cities generally west of downtown Los Angeles. For a full list of cities, see <https://laedc.org/wtc/chooselacounty/regions-of-la-county/westside/>.

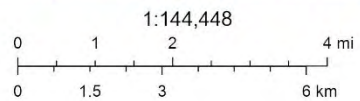
<sup>16</sup> Los Angeles County Economic Development Corporation; <https://laedc.org/industries/overview/>.

previously described factors as it varies across all incomes, demographics, and households. The City just so happens to be within range of LAX, where much of the jobs in the region are located near, making it more desirable for economic reasons.



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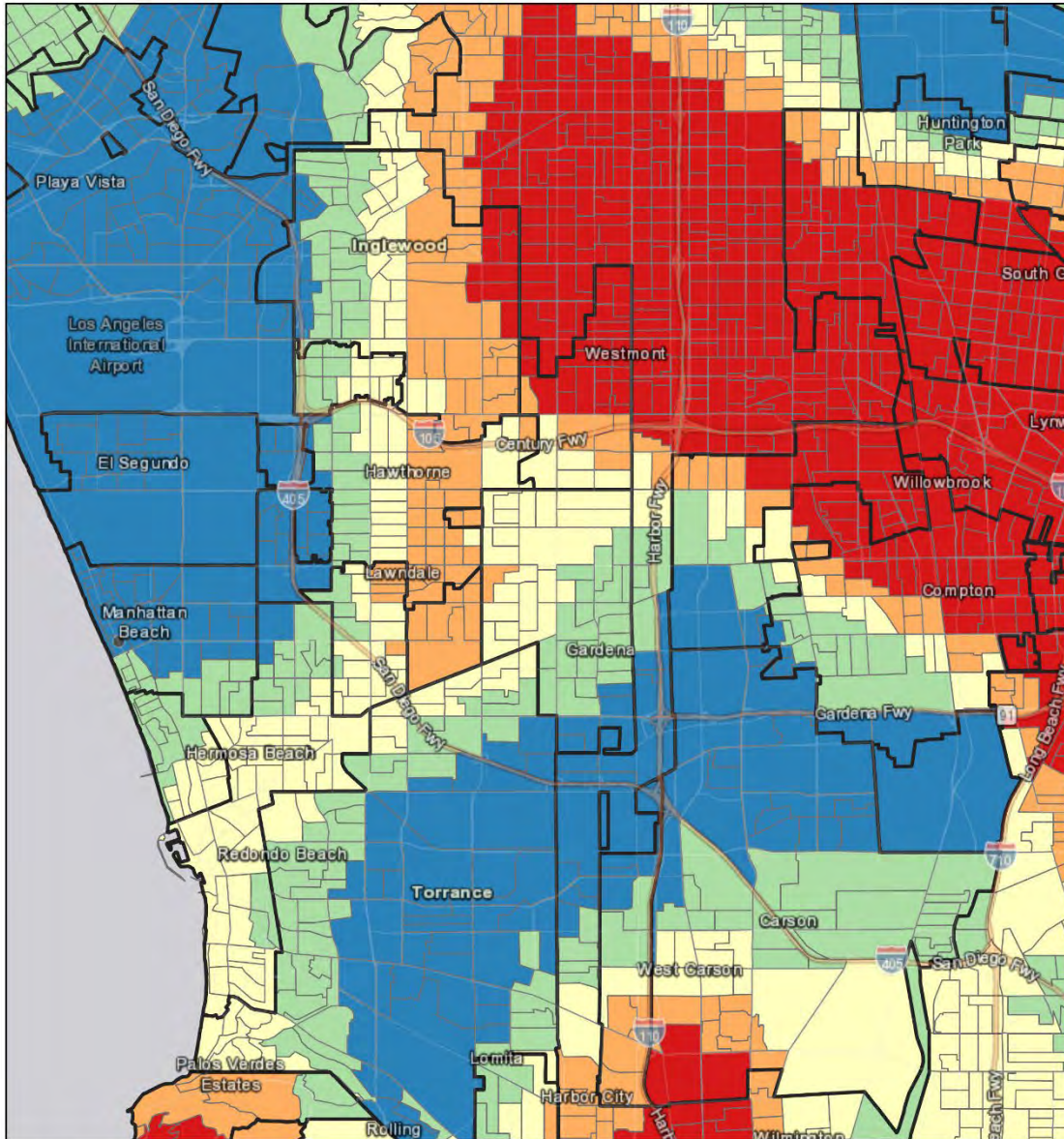
- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Economic Score - Tract
- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data



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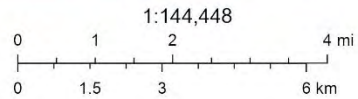
City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

Figure 26. Economic Opportunity



8/19/2021, 1:00:03 PM

- City/Town Boundaries
- (A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group
- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)



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CA HCD  
 County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure 27. Jobs Proximity



### 4.6.3 Transportation

Access to consistent, efficient, and varied modes of transportation is important, especially for persons without access to a personal vehicle. **Figure 28, Access to Transportation**, displays various modes of transportation, pedestrian and bicycle paths, and “High Quality Transit Areas” in the Southern California Association of Governments’ jurisdiction. The majority of the pedestrian and bicycle paths are found in the western area of the City, near the beach areas. Bus services connect the areas north and south, as well as east and west along the main commercial corridors. The nearest light rail line operates outside of the City’s boundaries in El Segundo and Lawndale. The northeastern corner of the City, which is made up of commercial uses, falls within a High-Quality Transit Area due to its proximity to the Green Line. **Figure 29, Regional Access to Transportation**, displays where Manhattan Beach is connected to surrounding areas, including key areas of employment such as Torrance to the southeast and Los Angeles, El Segundo and Playa Del Rey to the north. Regional transit options offer high access to employment opportunity for those without a vehicle, including lower-income households that may not be able to afford a vehicle and those that physically may not be able to drive. Local data shows that that approximately 30% of Manhattan Beach residents in the workforce, work in the City of Los Angeles, while approximately 8% work in Manhattan Beach and nearly 8% in El Segundo. Approximately 42% of Manhattan Beach residents in the workforce travel less than 10 miles for work. Various modes and options for transportation vary throughout the region. Pedestrian and bicycle options are mainly found near recreational areas and along beaches. Public transit and high-quality transit areas correlate to areas with lower median income, single income households, and are located far from jobs. The City has few transit options; however, it can be inferred that residents with higher median income are more likely to own personal vehicles or are located near amenities and jobs.

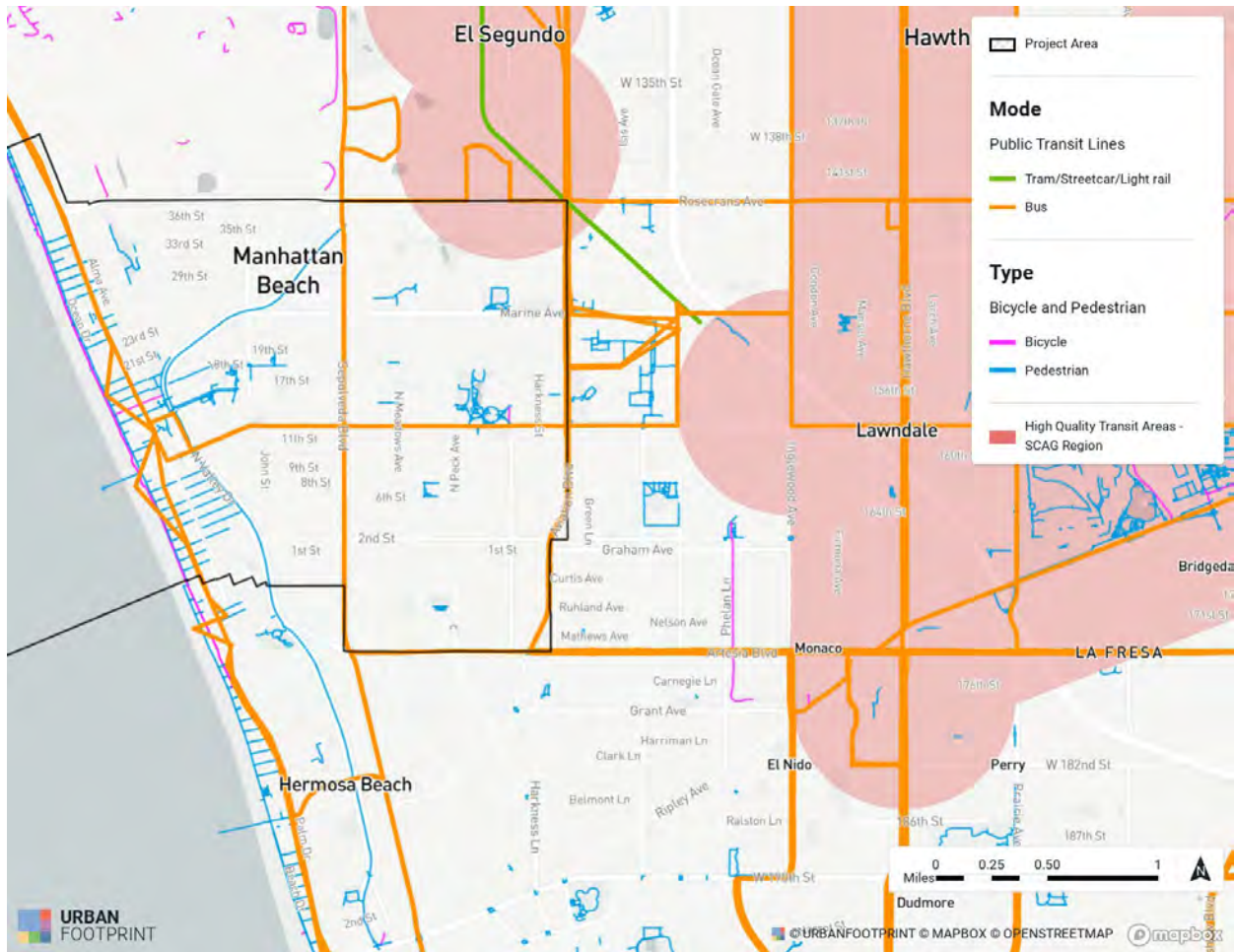


Figure 28. Access to Transportation

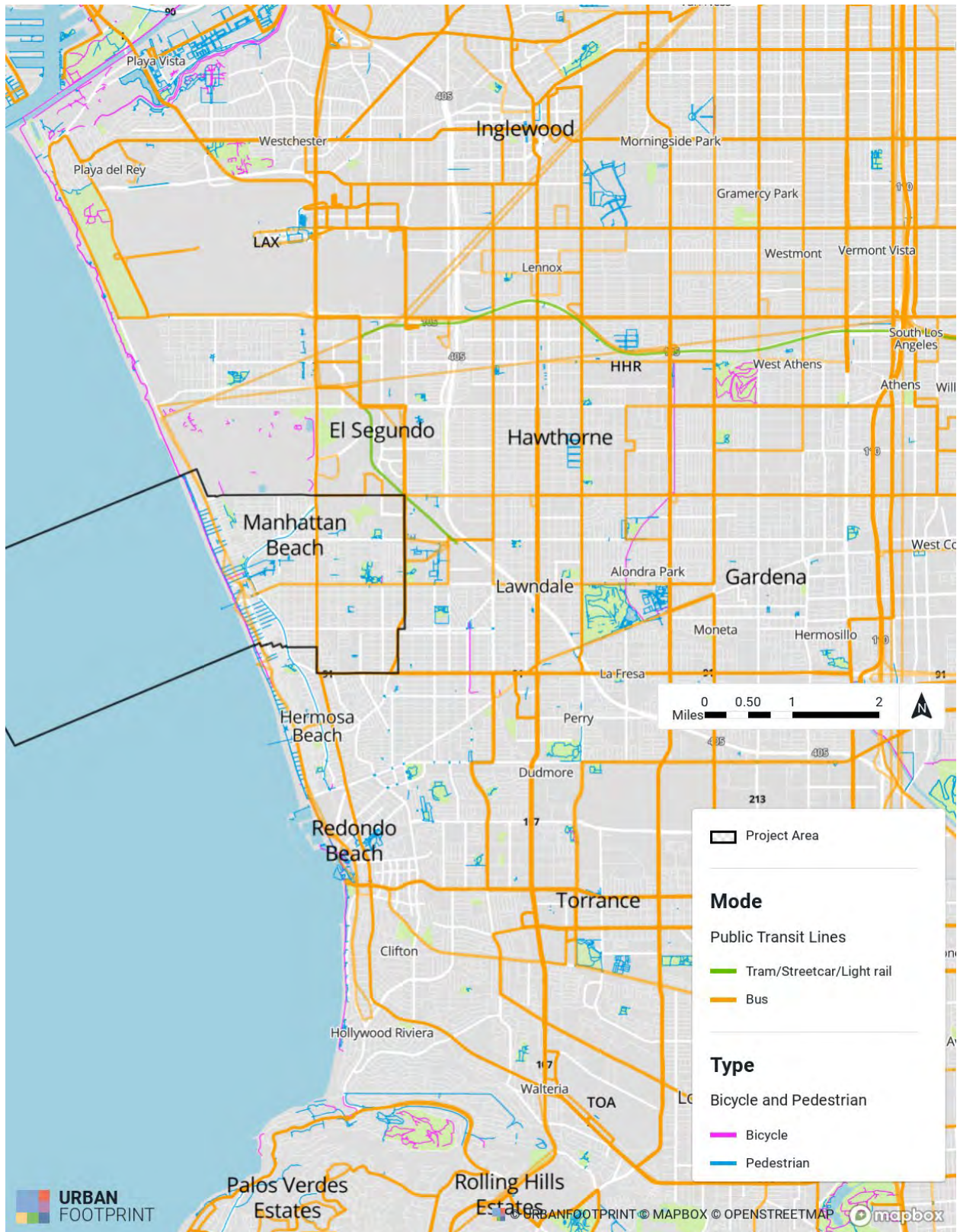


Figure 29. Regional Access to Transportation

#### 4.6.4 Environment

Access to a clean and healthy environment plays an important role in maintaining adequate quality of life. Air pollution, water quality, access to open spaces, and vegetation are among the environmental factors that are weighted in different health indices that attempt to show levels of environmental quality. **Figure 30, Opportunity for Environment**, shows the opportunity for access to environmentally healthy neighborhoods. As shown in **Figure 30**, the southern area of the City is considered to be in a more positive TCAC Opportunity Area outcome range (0.75–1). The tract in the northwest area indicates moderate environmental outcomes (0.5–0.75), and the northeast area indicates less-positive environmental outcomes (less than 0.25). The coastal areas have higher environmental outcome scores, with the exception of LAX, the Chevron refinery, and their surrounding neighborhoods. At a regional scale, areas east of the City generally score in the moderate to above-moderate positive environmental outcomes. Tracts that abut a highway or are made up of industrial or manufacturing uses, such as portions of Torrance, score in the less-positive outcomes range. There may be a tradeoff between positive environmental outcomes and close job proximity. When comparing the environmental opportunity map to **Figure 27, Jobs Proximity**, areas that are furthest from jobs tend to have better environmental opportunity. Economic hubs like LAX and Torrance have less positive environmental outcomes, which may explain why northern tracts of the City that are closer to LAX may have a less positive score. Environmental outcomes have little influence on factors like income, household, and demographics as Inglewood and Coastal cities both have positive environmental outcomes despite having differing socio-economic characteristics.

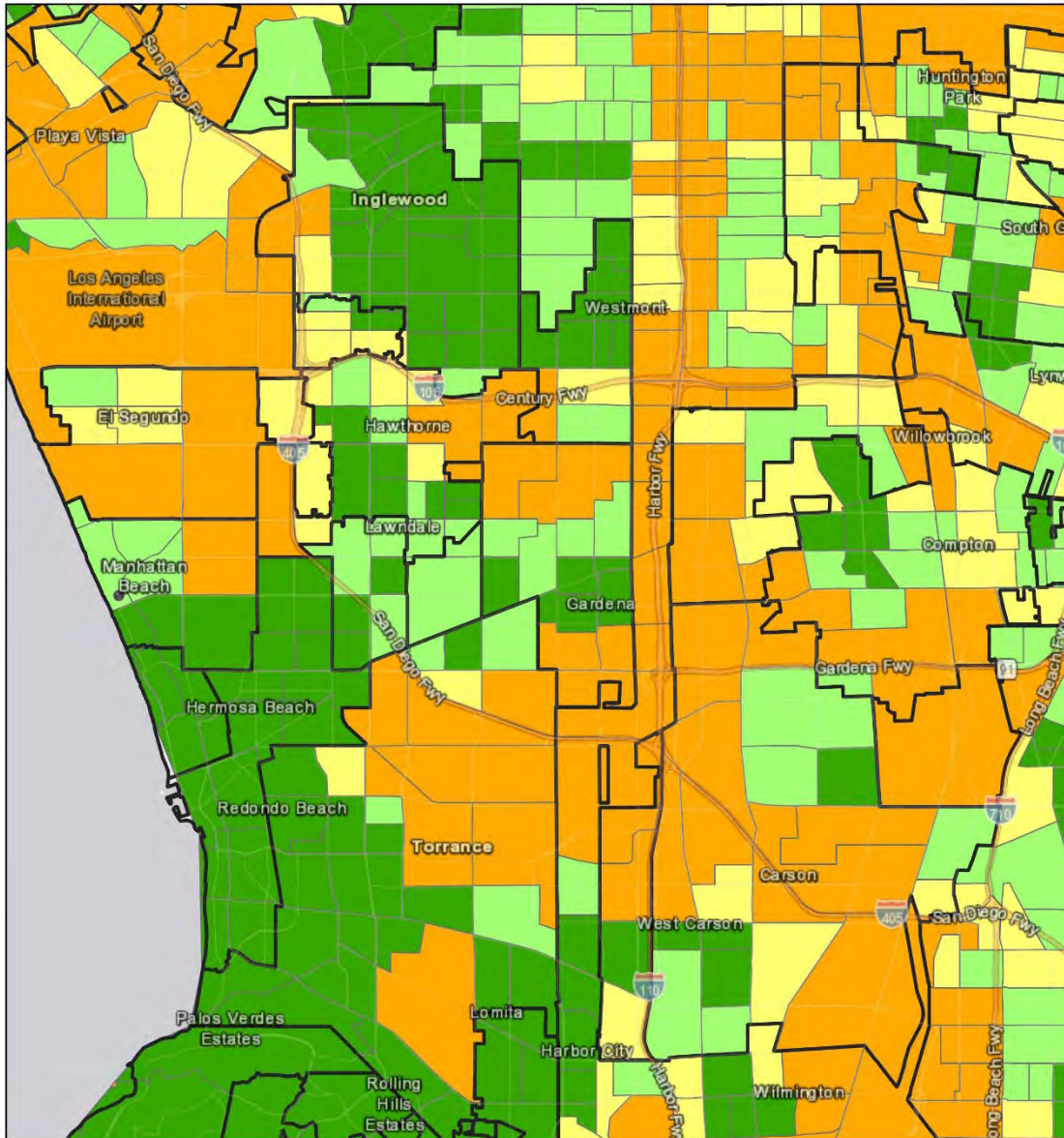
**Figure 31, CalEnviroScreen 3.0**, indicates that the majority of the City ranks in the 1 to 10 percentile range, meaning that residents have low exposure to pollutants. The southeastern area of the City ranks in the 15 to 20 percentile, which is also considered a low score. Some specific factors that are particularly detrimental to residents of this areas as identified by CalEnviroScreen are the following:

- Fine Particulate Matter: Particulate matter, one of six U.S. Environmental Protection Agency criteria air pollutants, is a mixture that can include organic chemicals, dust, soot, and metals. These particles can come from cars and trucks, factories, wood burning, and other activities. Fine particle pollution has been shown to cause many serious health effects, including heart and lung disease.
- Toxic Releases: Facilities that make or use toxic chemicals can release these chemicals into the air. People living near facilities may breathe contaminated air regularly or if contaminants are released during an accident. The local area with the relatively higher exposure to pollutants has a Toxic Release Percentile of 79. The following are nearby toxic release facilities:
  - Chevron Products Co Division of Chevron USA Inc.
  - Northrop Grumman Aerospace Systems
- Hazardous Waste: Waste created by commercial or industrial activities contains chemicals that may be dangerous or harmful to health. Only certain regulated facilities are allowed to treat, store, or dispose of this type of waste. These facilities are not the same as cleanup sites. Hazardous waste includes a range of different types of waste, such as used automotive oil and highly toxic waste materials produced by factories and

businesses. The local area with a relatively higher exposure to pollutants has a Hazardous Waste Percentile of 74. The following are nearby generators of hazardous waste:

- Air Products Manufacturing Corporation
- Honeywell El Segundo Site
- Target Store T0199
- West Basin Municipal Water District DBA Edward C Little Water Treatment

Other health indicators to consider when analyzing access to environmental opportunity include access to healthy food choices and access to medical services. Local data identified three census tracts in the City where up to 22.7 housing units per tract located east of Ardmore Avenue and south of Manhattan Beach Boulevard, as well as north of Ardmore Avenue and east of Bell Avenue are receiving benefits from the Supplemental Nutrition Assistance Program (SNAP). Low food access was also identified for these tracts based on a half mile demarcation to the nearest supermarket and vehicle access. Local data also indicates that the City has poor access to medical services such as hospitals, with the exception of local clinics. The nearest hospitals are located in the cities of Hawthorne and Torrance and are located more than a mile away from the City's outer boundaries.



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City/Town Boundaries

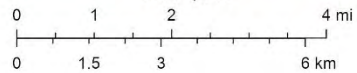
(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

< .25 (Less Positive Environmental Outcomes)

.25 - .50

.50 - .75

.75 - 1 (More Positive Environmental Outcomes)



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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure 30. Opportunity for Environment

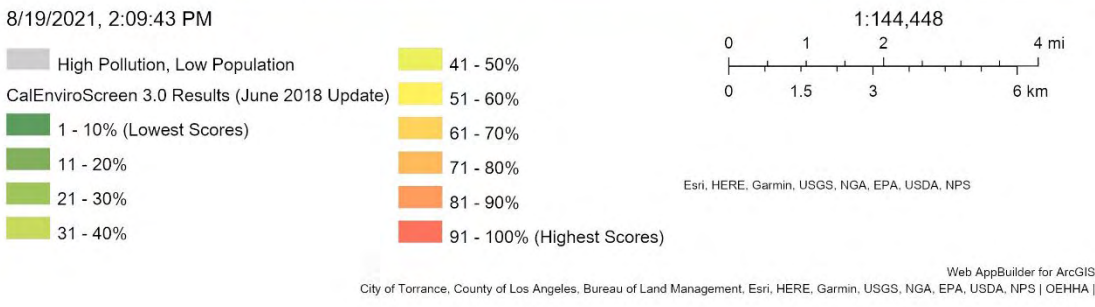
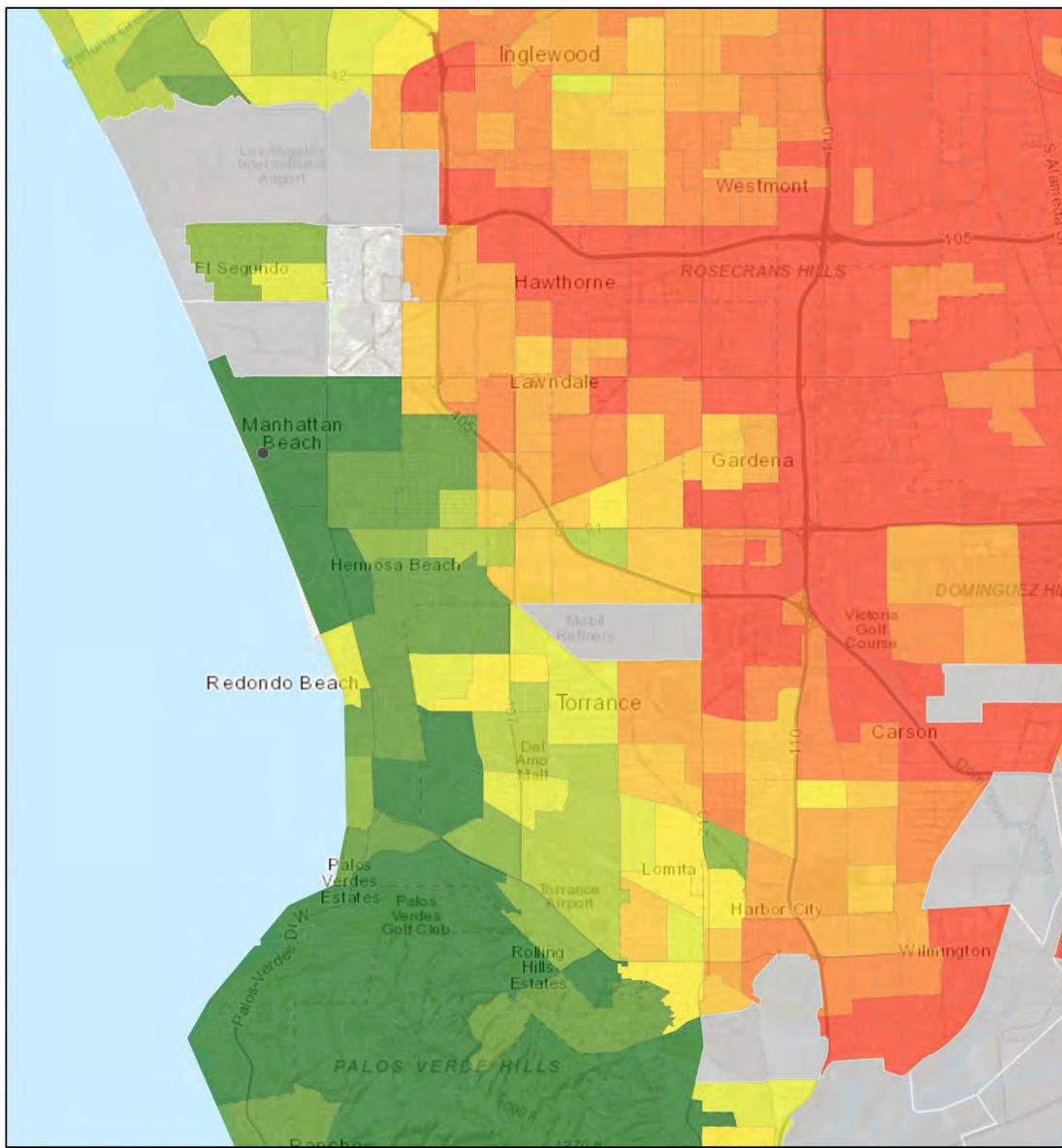


Figure 31. CalEnviroScreen 3.0

#### 4.6.5 Persons with Disabilities

Trends related to persons with disabilities, including local and State analysis of prevalence of disabilities by type and age group, are included in Appendix B. The Needs Assessment also covers services that are offered for persons with disabilities. Some common zoning barriers for persons with disabilities include the following:

- Reasonable Accommodation Procedure
  - Common issues with reasonable accommodation procedures include excessive findings of approval, burden on applicants to prove the need for exception, application costs, and discretionary approvals.
- Family Definition
  - Family definitions in zoning or other land use–related documents can directly impact housing choices for persons with disabilities, particularly regarding group home situations, which are commonly used by persons with disabilities. Regulating the number of people or requiring occupants to be related can be common elements in family definitions that create barriers.
- Excluding Residential Care Facilities
  - Excluding residential care facilities or subjecting these homes to a Conditional Use Permit in single-family zones acts as a barrier to housing choice for persons with disabilities.
- Spacing Requirements
  - Excessive spacing requirements between group homes or community or residential care facilities can directly impact the supply of housing choices for persons with disabilities.
- Unit Types and Sizes
  - The lack of multifamily housing or zoned capacity for multifamily housing and a variety of sizes, from efficiency to four or more bedrooms, can constrain the ability of persons with disabilities to live in a more integrated community setting.
- Lack of By-Right Zoning for Supportive Housing<sup>17</sup>
  - By-right zoning for supportive housing can result in more objective processes that are less likely to discriminate or have the effect of discriminating against persons with disabilities.

The City provides a reasonable accommodations procedure according to State law. Furthermore, the Manhattan Beach Municipal Code’s definition of “family” is in compliance with State requirements, as it does not require a certain relationship among the members, nor does it limit the size or specify other characteristics. Therefore, the definition of “family” does not constrain or limit development of residential

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<sup>17</sup> “Supportive housing” means housing with no limit on length of stay that is occupied by the target population and that is linked to an on-site or off-site service that assists the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community (Government Code 65582).



care facilities or other specialized housing for unrelated individuals or those with disabilities or special needs. “Supportive Housing” under the Manhattan Beach Municipal Code is considered a residential use and is subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone. A potential barrier for persons with disabilities is access to multifamily housing, as there is a lack of variety of housing types in the City. According to California Department of Finance 2019 Population and Housing Unit Estimates, 77.2 percent of housing units in the City are single-family residential detached or attached, 16.3 percent are two- to four-unit multifamily, and 6.4 percent are multifamily with five or more units. Approximately 400 acres of land are zoned to allow for multifamily development, and 1,497 acres are zoned to allow for single-family residential. Although multifamily is permitted in most zones that allow residential uses, most of these zones also allow for single-family residential. Refer to **Appendix C, Constraints and Zoning Analysis**, for a detailed summary of zones, allowable uses, and development standards. The Single-Family Residential Zoning District (RS), which does not allow for multifamily development, accounts for 73 percent of the 1,497 acres zoned to allow for single-family residential. Under HCD’s guidance, Zoning Barriers for Persons with Disabilities, zoning capacity for multifamily residential is considered a barrier for multifamily development. Previously shown in **Figure 13, Population with a Disability**, areas with increasing percentage of population with a disability are located to the east near Gateway cities and Southeast Los Angeles. This correlates to areas where there is more diversity, median household income is lower, and where single-income households are common. As a result, the lower percentage of population with a disability in the City may be due to multiple factors which could include the high cost of housing, a lack of opportunities for those with disabilities, or higher incomes may correlate to better medical care which could decrease the likelihood of having a disability, among other factors.

## 4.7 Disproportionate Housing Needs and Displacement Risk

Homeownership is one of the largest assets for most households in the United States, and, for many households, provides a significant opportunity to build wealth. Over generations, many households have used wealth gained through homeownership to send their children to college or invest in other opportunities, creating access to more wealth. One of the most prevalent consequences of residential segregation is the intergenerational inaccessibility of homeownership.<sup>18</sup> According to the Census, 9,344 households (69.6 percent) in the City were owner-occupied in 2019, and 4,083 units (30.4 percent) were renter-occupied. The homeownership rate within the City is higher than the County’s homeownership rate of 45.8 percent, and the renter-occupancy rate is lower than the County’s rate of 54.2 percent.

Generally, persons with protected characteristics, including minority households, and renter households are more likely to experience higher rent burdens and poor housing conditions, such as lack of plumbing or kitchen facilities, or to experience overcrowding. These populations also have an increased risk of displacement and/or homelessness. Although the City has high ownership rates and a small population of minority households, this section assesses disproportionate housing needs, including displacement risk, with a focus on people with protected characteristics.<sup>19</sup> Disproportionate housing needs are based on

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<sup>18</sup> Disparities in Wealth by Race and Ethnicity in the 2019 Survey of Consumer Finances, 2020.

<https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm>.

<sup>19</sup> “Protected Characteristics” under the Fair Housing Act includes race, color, national origin, religion, sex, familial status, and disability.

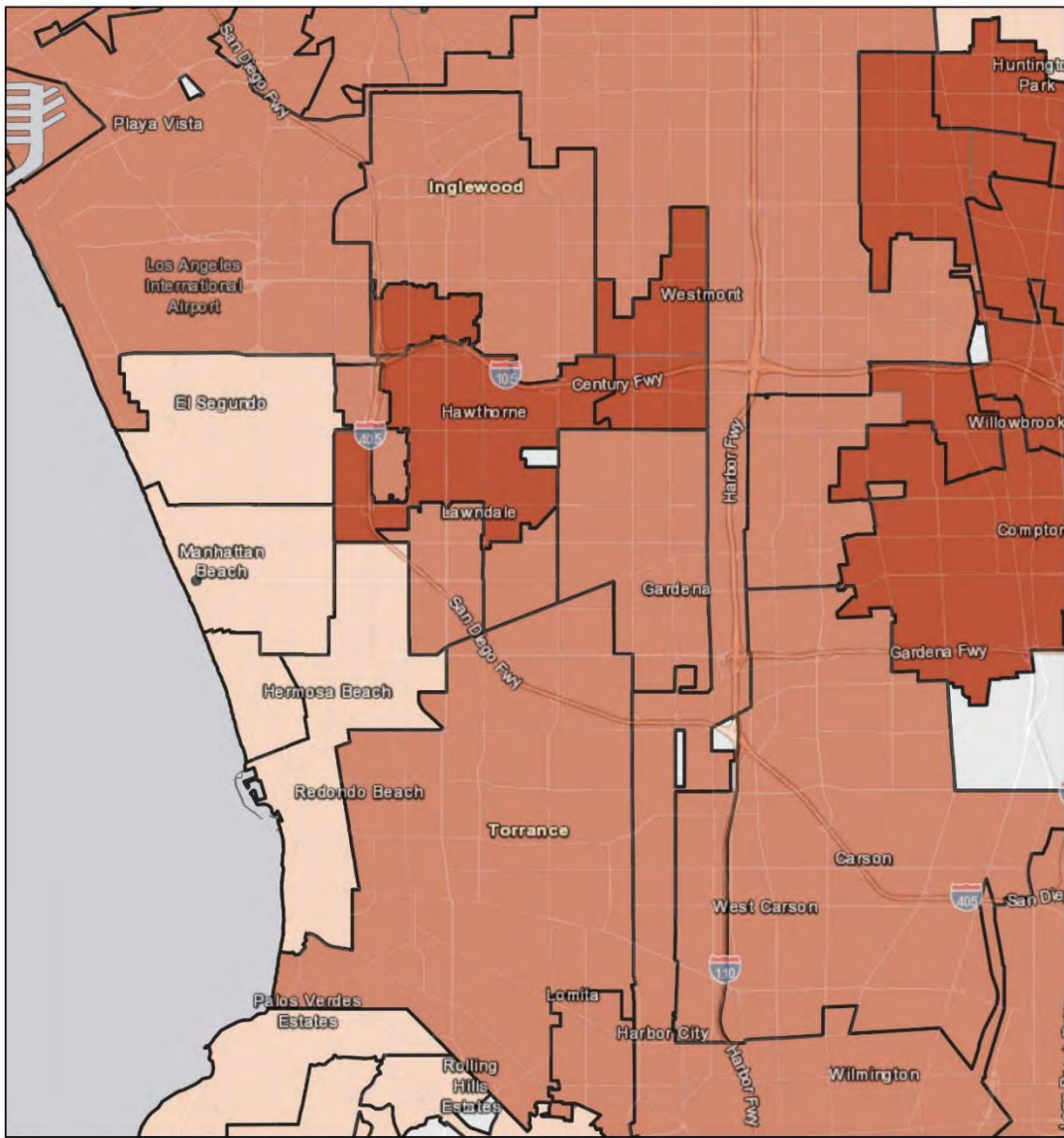
factors such as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.

#### 4.7.1 Substandard Housing

White, non-Hispanic households across the region and in each jurisdiction are the least likely to experience housing problems, and Black and Hispanic households experience housing problems at the highest rates. Substandard housing problems include households without hot and cold piped water, a flush toilet, and/or a bathtub or shower, and households with kitchen facilities that lack a sink with piped water, a range or stove, and/or a refrigerator. **Figure 32, Substandard Housing**, shows the percent of all households with any of the four severe housing problems identified in HCD AFFH mapping tool:

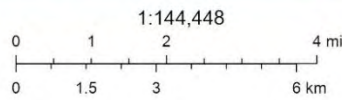
- Lack of a complete kitchen
- Lack of complete plumbing
- Severely overcrowded
- Severely cost burdened

**Figure 32** indicates that less than 20 percent of total households in the City have any of the four severe housing problems. Abutting cities to the north and south also have less than 20 percent of all households with substandard housing. The map indicates that cities to the east have higher percentages of households that experience any of the four severe housing problems, specifically in the 20 percent to 40 percent category, and some have 40 percent to 60 percent of households experiencing substandard housing problems.



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City/Town Boundaries



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

**Legend**

City/Town Boundaries



(A) Percent of all households with any of the 4 severe housing problems (lacks complete kitchen, lacks complete plumbing, severely overcrowded, severely cost-burdened) - (ACS, CHAS) - City Level

Percent of all households with any of the 4 severe housing problems



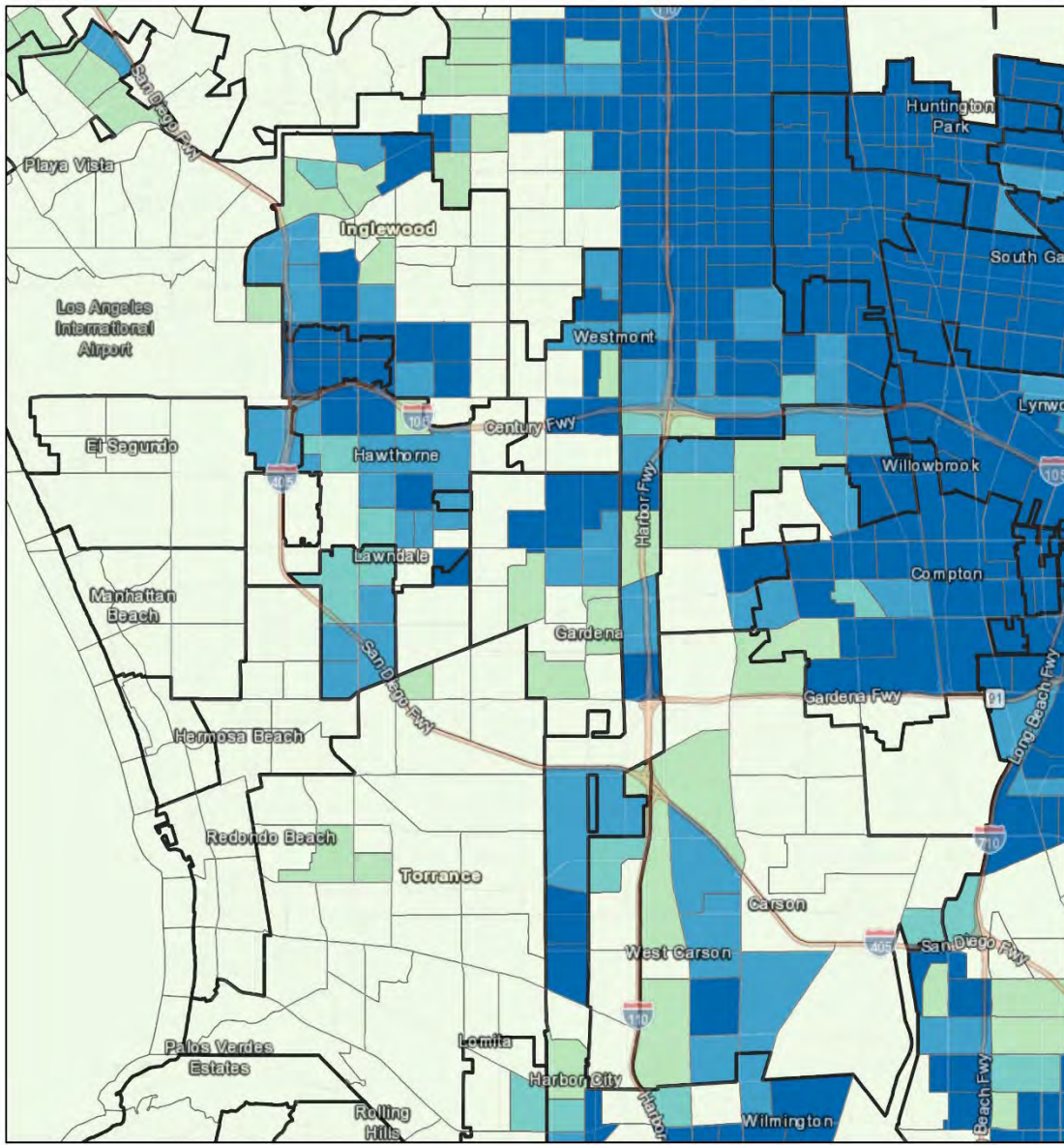
Figure 32. Substandard Housing

#### 4.7.2 Overcrowding

Residential crowding is used to reflect demographic and socioeconomic conditions. Immigrant communities, low-income families, and renter-occupied households are more likely to experience overcrowding.<sup>20</sup> Overcrowding is defined by the U.S. Census Bureau as a housing unit occupied by more than one person per room. A severely overcrowded household is defined as having more than 1.5 persons per room. In this definition, “room” includes living rooms, dining rooms, and bedrooms, but does not include the kitchen or bathrooms. In the City, the percent of overcrowded and severely overcrowded households is less than or equal to 8.2 percent (see **Figure 33, Overcrowding**, and **Figure 34, Severe Overcrowding**). The region has a similar pattern of overcrowding and severe overcrowding, where the coastal cities experience low percentages and the cities to the east experience higher percentages. The areas of Westmont, Willowbrook, and Compton, as well as other cities in the Gateway Cities area, experience higher percentages of overcrowding (**Figure 33**).

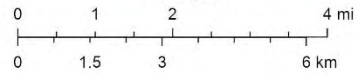
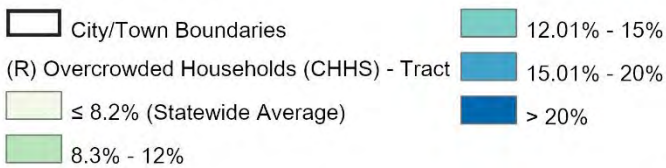
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<sup>20</sup> <https://data.chhs.ca.gov/dataset/housing-crowding>



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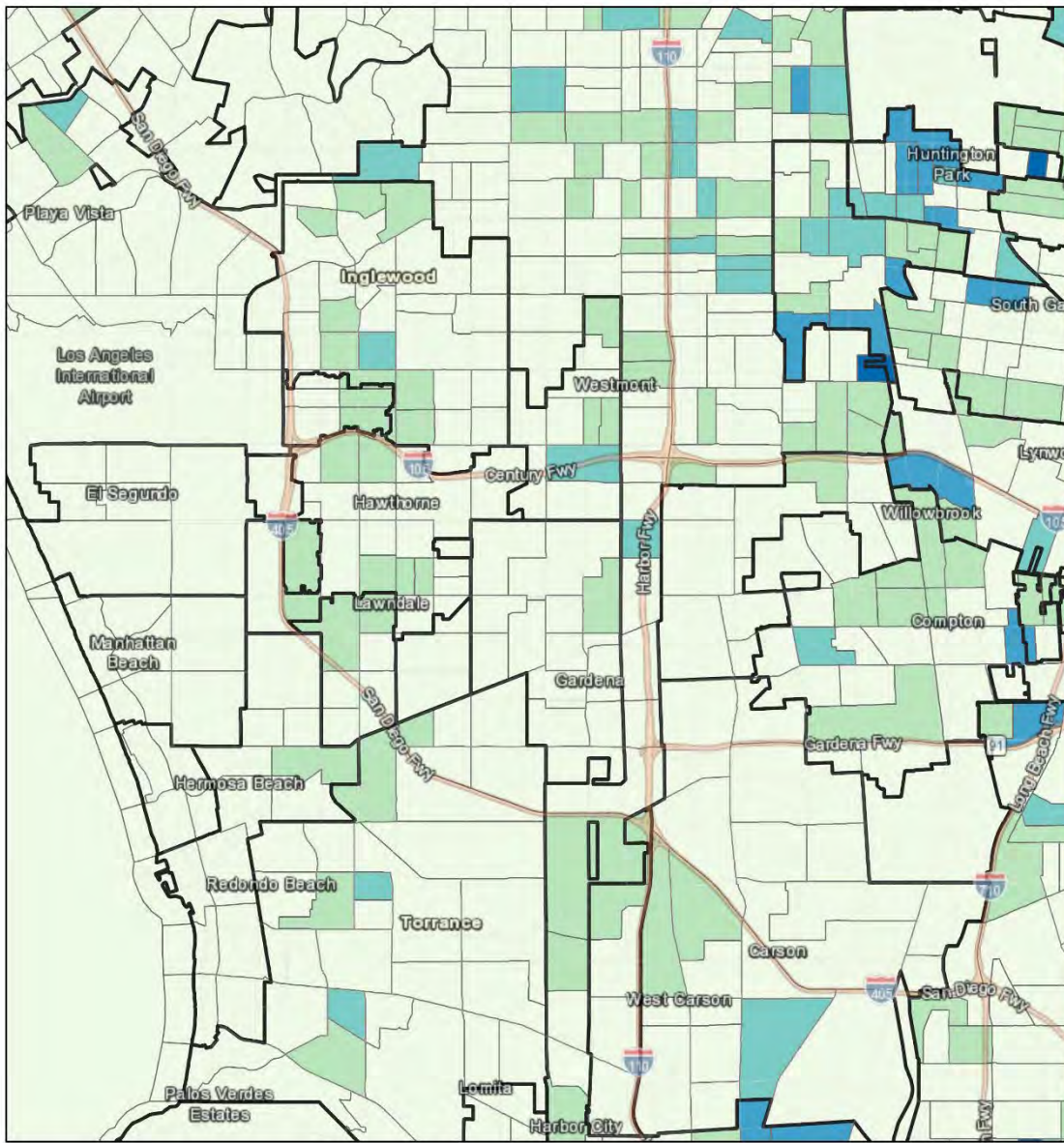
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CA HCD  
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

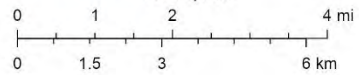
Figure 33. Overcrowding



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- City/Town Boundaries
- (R) Severely Overcrowded Households (CHHS) - Tract
- ≤ 5%
- 5% - 20%
- 20% - 35%
- 35% - 65%
- > 65%



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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure 34. Severe Overcrowding

### 4.7.3 Housing Affordability

According to the Federal government, rental housing is considered “affordable” if the people living there pay no more than 30 percent of their income for housing (rent or mortgage). As identified in Appendix B, approximately 84 percent of lower-income renter households and 55 percent of lower-income owner occupied households overpay for housing. Approximately 70 percent of moderate-income renter households and 51 percent of moderate-income owner-occupied households overpay for housing. Approximately 15 percent of above moderate-income renter households and 18 percent of above moderate-income owner households overpay for housing. This indicates that lower-income households are disproportionately burdened by the cost of housing, especially lower-income renters.

Although the median household income in the City is \$153,023, the average salary for jobs in the City is \$67,947. Persons who work in the City may not be able to live in the City since the cost of living is relatively high when compared to the region. According to the Zillow Home Value Index, August 2021 estimates, the median home value in the City is \$2,923,949. The median rent for a one-bedroom unit is \$2,410, for a two-bedroom unit is \$3,090, for a three-bedroom unit is \$4,110, and for a four-bedroom unit is \$4,480.<sup>21</sup> The Fair Market Rent<sup>22</sup> for the Los Angeles–Long Beach area is relatively lower than rent in the City; for the 2021 fiscal year, a one-bedroom unit was estimated at \$1,605, a two-bedroom unit was estimated at \$2,058, a three-bedroom unit was estimated at \$2,735, and a four-bedroom unit was estimated at \$2,982. Moderate- and above-moderate-income households are also cost burned.

The high cost of living in the City can be seen in **Figure 35, Homeowner Cost Burden (2015-2019)**, with tracts indicating 20 percent to 40 percent and 40 percent to 60 percent of owner households whose mortgages are more than 30 percent of the median household income. The highest level of homeowner overpayment in the City is located in the western boundary, abutting the coast, and the northeast corner. As evident by **Figure 36, Homeowner Cost Burden (2010-2014)**, homeowner overpayment was the same for the previous five years. Although homeowner payment was higher for the general region. This indicates that the City is stable in regard to homeowner mortgages. The City, as well as many other coastal cities have a lower percentage of owner households whose mortgages are more than 30 percent of the median household income when compared to the region. Areas closer to South Los Angeles and Gateway cities bear a higher burden as overpayment by homeowners may reach more than 60 percent and up to over 80 percent.

Renters in the City have varying percentages of the cost burdened population (**Figure 37, Renter Cost Burden 2015-2019**). The southeastern, central, and northwestern areas of the City experience 20 percent to 40 percent cost burden; in the northeastern area renters experience the highest level of cost burden in the City at 40 percent to 60 percent. The lowest percent of renter households who experience overpayment, less than 20 percent of households, is located in the southwestern area of the City abutting Hermosa Beach. Coastal cities’ homeowner and renter households face similar trends, and cities to the east indicate a higher percentage of households experiencing homeowner and renter overpayment. As shown in **Figure 38, Renter Cost Burden (2010-2014)**, renter households who experience overpayment

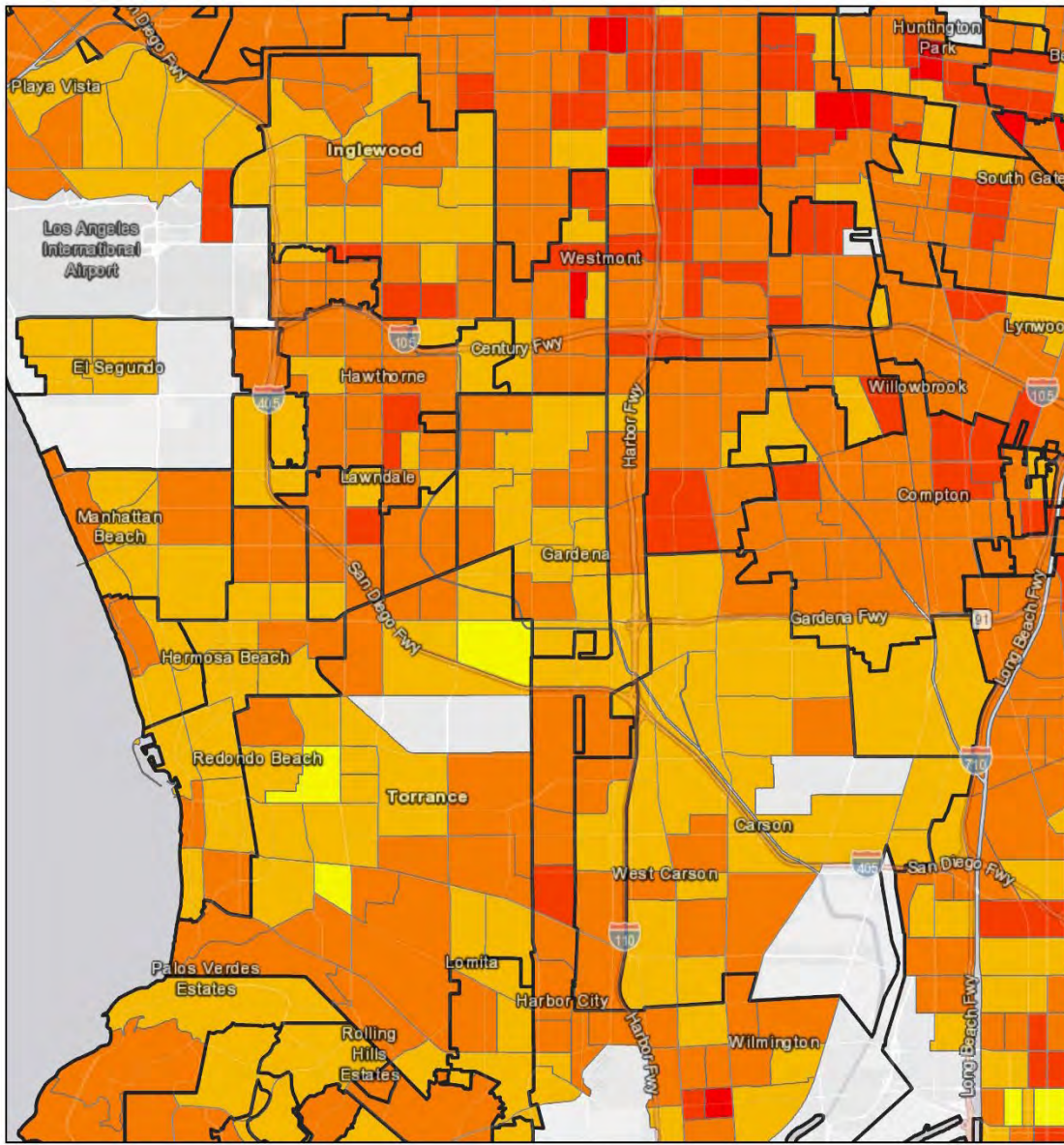
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<sup>21</sup> <https://patch.com/california/manhattanbeach/rent-estimates-manhattan-beach-area>

<sup>22</sup> The Department of Housing and Urban Development (HUD)-formulated Fair Market Rent (FMR) schedule serves as a guide for the maximum rents allowable for those units receiving Section 8 assistance. HUD uses the Consumer Price Index and the Census Bureau housing survey data to calculate the FMRs for each area.

was nearly the same as the previous five years with the cost burden increasing or decreasing in different tracts throughout the city. Patterns over time show that renter households who experience overpayment is less than the previous five years for the region. In comparison to the region, renters in the City have a low-cost burden relative to inland cities where cost burden can exceed 60 percent. This may be attributed to the pattern of wealth commonly associated with coastal cities in Los Angeles and across the state.

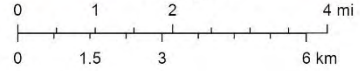




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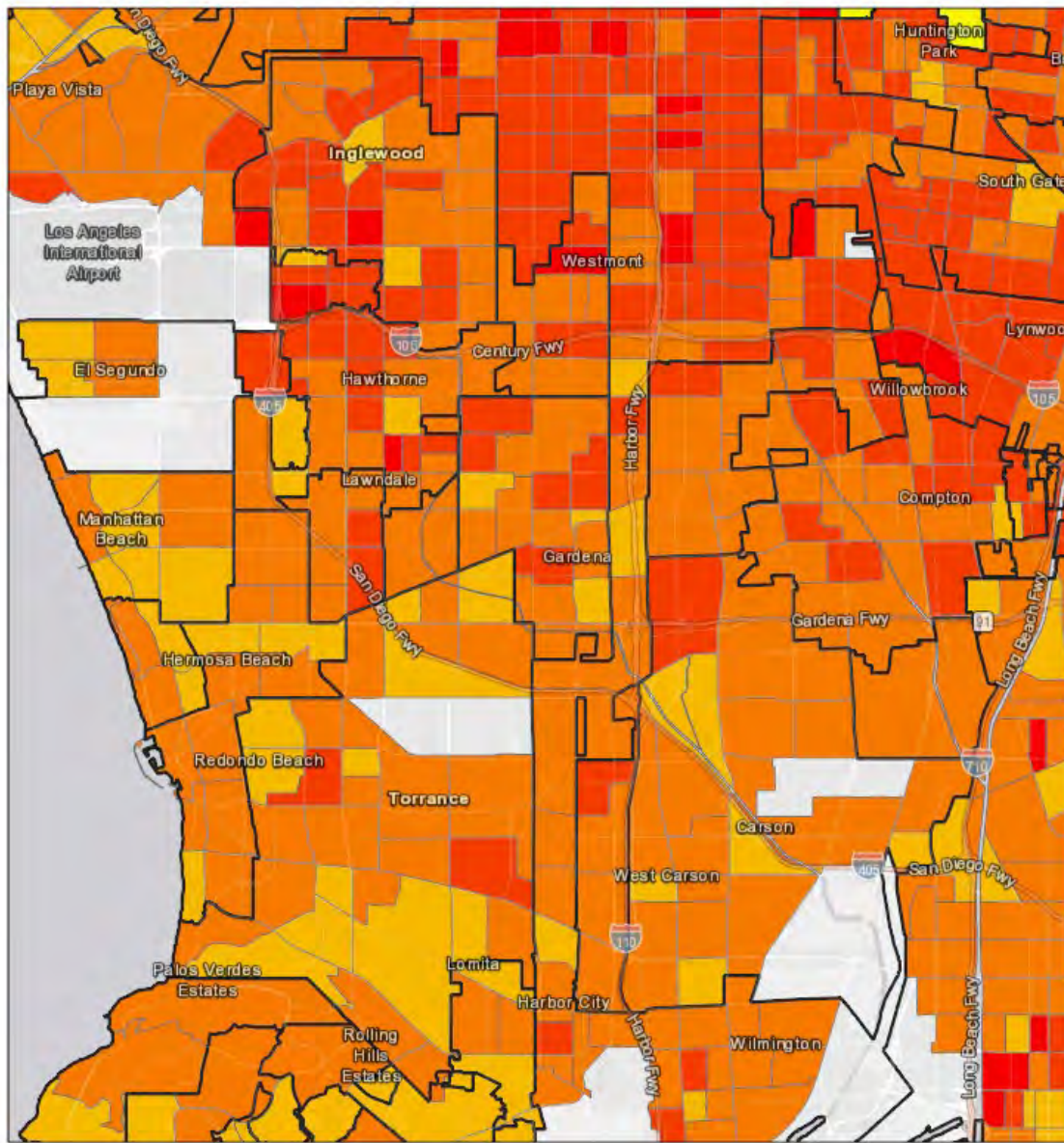
- City/Town Boundaries
- (R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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 County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure 35. Homeowner Cost Burden (2015-2019)

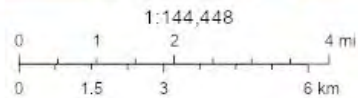


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City/Town Boundaries

(A) Overpayment by Home Owners (ACS, 2010 - 2014) - Tract

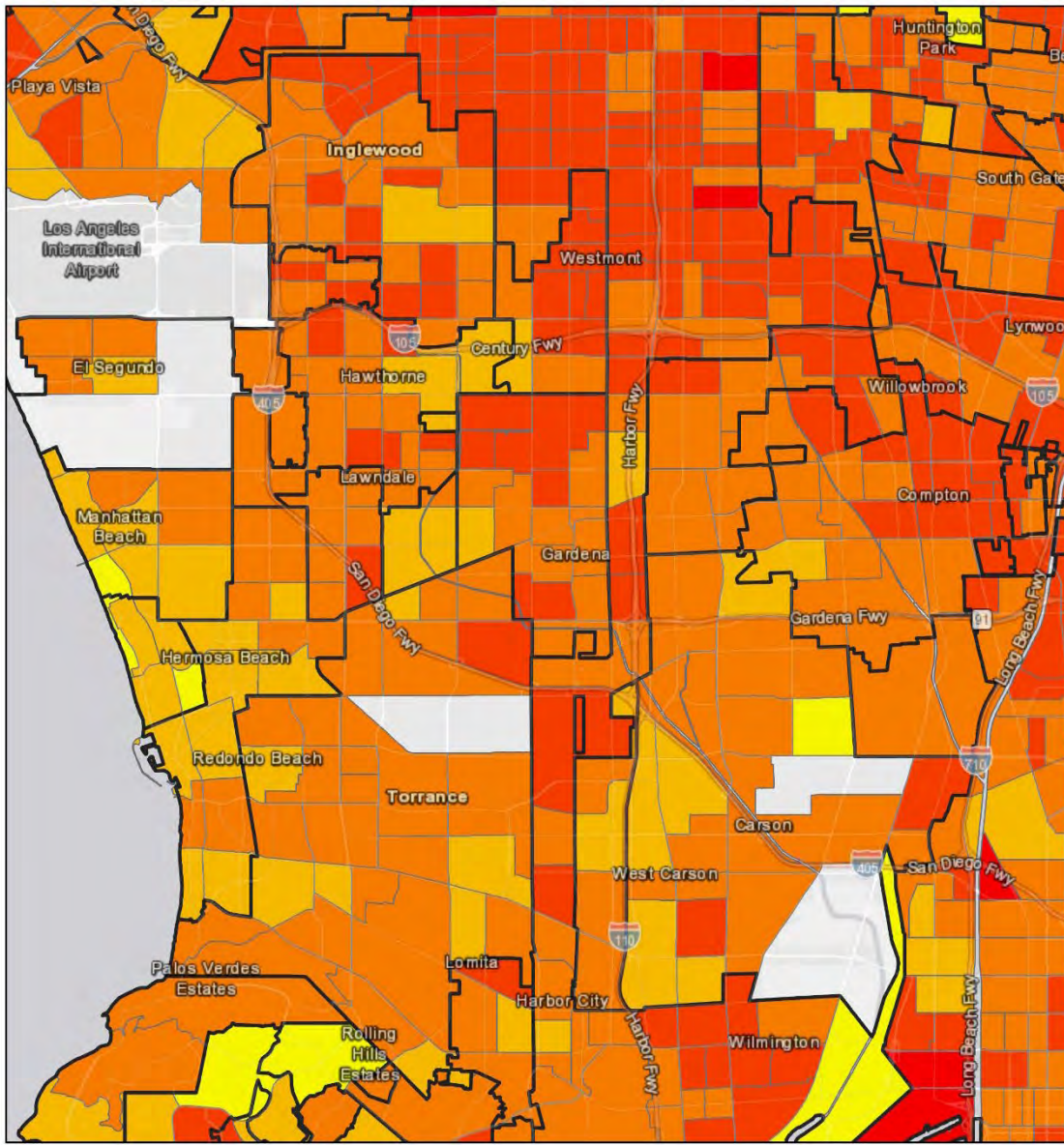
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S.

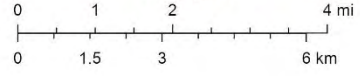
Figure 36. Homeowner Cost Burden (2010-2014)



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- City/Town Boundaries
- (R) Overpayment by Renters (ACS, 2015 - 2019) - Tract
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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CA HCD  
 County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure 37. Renter Cost Burden (2015-2019)

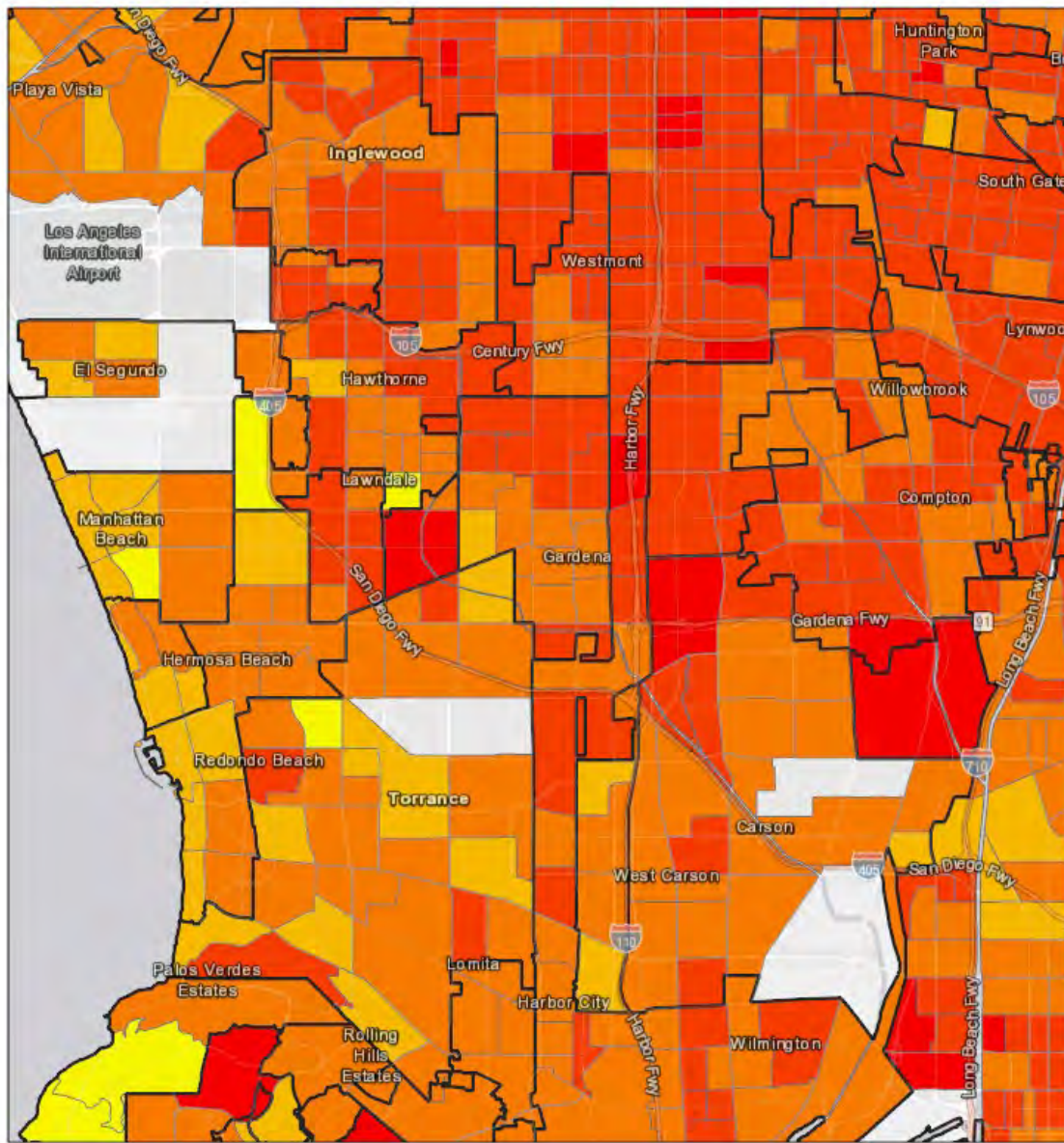


Figure 38. Renter Cost Burden (2010-2014)

#### 4.7.4 Displacement

Displacement is generally caused by disinvestment, new investment, or natural disasters. Gentrification, or the influx of capital and higher-income residents into working-class neighborhoods, is often associated with displacement, which occurs when housing costs or neighborhood conditions force people out and drive rents so high that lower-income people are excluded from moving in.

According to the Urban Displacement Project, a research collaboration between UC Berkeley and the University of California, Los Angeles, the City is considered “Stable/Advanced Exclusive” (see **Figure 39, Displacement Map**). The criteria for “Stable/Advanced Exclusive” is as follows:

- High-income tract in 2000 and 2018
- Affordable to high or mixed high-income in 2018
- Marginal change, increase, or rapid increase in housing costs

Coastal cities fall into the following displacement typologies: Stable Moderate/Mixed Income, At Risk of Becoming Exclusive, Becoming Exclusive, and Stable/Advanced Exclusive. Other cities in the South Bay and Gateway Cities experience a mix of Stable Moderate/Mixed Income and At Risk of Becoming Exclusive, with pockets of Stable/Advanced Exclusive; however, the predominant displacement typology, specifically in the Inglewood, Gardena, Compton, and South Gate areas, are Low-Income/Susceptible to Displacement, followed by Advanced Gentrification, Early/Ongoing Gentrification, and At Risk of Gentrification. A list of the displacement typology and corresponding criteria can be found in **Figure 40, Displacement Typology**.

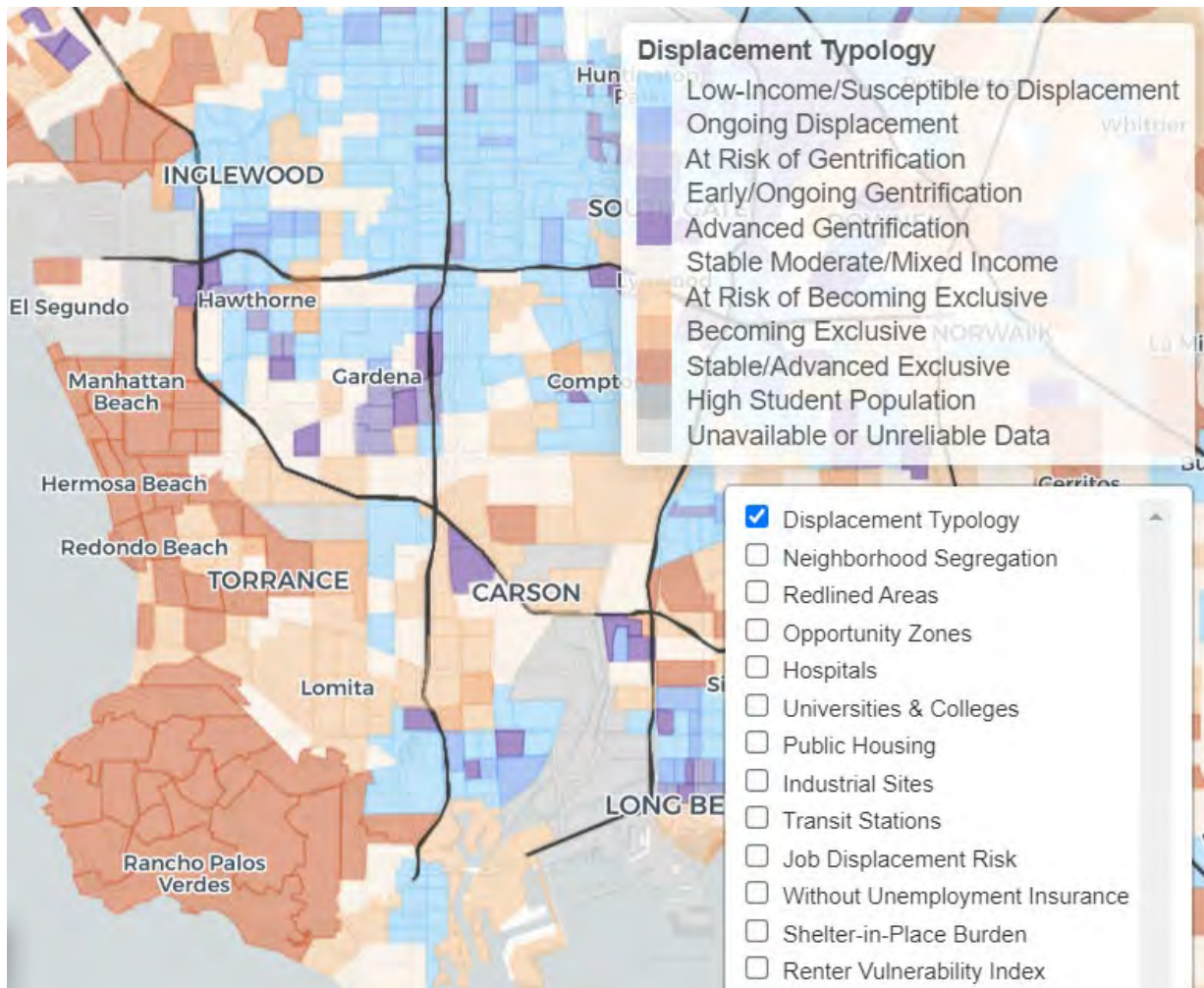


Figure 39. Displacement Map

<b>MODIFIED TYPES</b>	<b>CRITERIA</b>
LOW-INCOME/SUSCEPTIBLE TO DISPLACEMENT	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018</li> </ul>
ONGOING DISPLACEMENT OF LOW-INCOME HOUSEHOLDS	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018</li> <li>• Absolute loss of low-income households, 2000-2018</li> </ul>
AT RISK OF GENTRIFICATION	<ul style="list-style-type: none"> <li>• Low-income or mixed low-income tract in 2018</li> <li>• Housing affordable to low or mixed low-income households in 2018</li> <li>• Didn't gentrify 1990-2000 OR 2000-2018</li> <li>• Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018</li> <li>• Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap</li> </ul>
EARLY/ONGOING GENTRIFICATION	<ul style="list-style-type: none"> <li>• Low-income or mixed low-income tract in 2018</li> <li>• Housing affordable to moderate or mixed moderate-income households in 2018</li> <li>• Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2012-2018</li> <li>• Gentrified in 1990-2000 or 2000-2018</li> </ul>
ADVANCED GENTRIFICATION	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Marginal change, increase, or rapid increase in housing costs</li> <li>• Gentrified in 1990-2000 or 2000-2018</li> </ul>
STABLE MODERATE/MIXED INCOME	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> </ul>
AT RISK OF BECOMING EXCLUSIVE	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Marginal change or increase in housing costs</li> </ul>
BECOMING EXCLUSIVE	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Rapid increase in housing costs</li> <li>• Absolute loss of low-income households, 2000-2018</li> <li>• Declining low-income in-migration rate, 2012-2018</li> <li>• Median income higher in 2018 than in 2000</li> </ul>
STABLE/ADVANCED EXCLUSIVE	<ul style="list-style-type: none"> <li>• High-income tract in 2000 and 2018</li> <li>• Affordable to high or mixed high-income households in 2018</li> <li>• Marginal change, increase, or rapid increase in housing costs</li> </ul>

Figure 40. Displacement Typology

#### 4.7.5 Homelessness

The 2020 point-in-time data estimated that there more than 63,000 (sheltered and unsheltered) people experiencing homelessness in Los Angeles County. As of the 2020 survey, there were an estimated 15 unsheltered people experiencing homelessness in the City. The number has declined by approximately 46% since 2019, where the City had 22 people that were unsheltered. Of those unsheltered in 2019, approximately 11 were sleeping in vehicles, 8 were Hispanic or Latino persons, 13 were between the ages 25 and 54 years, and 16 identified as male. In 2018, the City calculated 41 unsheltered people, indicating that the number has declined greatly over the last few years. Additional analysis on those experiencing homelessness in the City and resources that are available to support this population is included in **Appendix B, Needs Assessment**.

Generally, households that experience higher rent burdens, poor housing conditions, and an increased risk of displacement are at greater risk of experiencing homelessness. When compared to the region, Manhattan Beach has lower rates of substandard housing, overcrowding, and is at a low risk of displacement. While there are moderate rates of household overpayment for both renters and homeowners in the City, overpayment is relatively low when compared to the region.

### 4.8 Summary of Fair Housing Issues

The following is a list of key conclusions and potential impediments that may exist in the City based on the fair housing issues identified in this assessment of fair housing:

- **Racial Demographics:** The racial composition of the City is primarily non-Hispanic White and is not racially diverse when compared to the region. Approximately 73 percent of City residents are non-Hispanic White; 19 percent of the population is Asian; and 8 percent of residents identify as Hispanic. At a regional level, the City is not considered to be integrated.<sup>23</sup>
- **Median Household Income:** The median household income is \$153,023, which is 239 percent of the County median income of \$68,004. Although there are no wealth segregation trends in the City, at a regional level, there is a relatively large wealth gap between the City and County.
- **Housing Affordability:** Of the renter-occupied lower-income households, about 83 percent spent more than 30 percent of their income on rent. Of the total 13,535 households in the City, approximately 29 percent were housing cost burdened.
- **Variety of Housing Types:** The City does not have a diverse housing supply because the share of all single-family units in the City is approximately 77.2 percent, higher than the 61.7 percent share of single-family units in the Southern California Association of Governments region.

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<sup>23</sup> Integration generally means a condition in which there is not a high concentration of persons of one particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.



## 5 Sites Inventory

State law, Government Code Section 65583.2(a), requires that the sites identified in a sites inventory be analyzed with respect to the AFFH analysis to determine if the designation of sites serves the purpose of replacing segregated living patterns with balanced living patterns and transforming R/ECAPs into areas of opportunity. Through the various goals, policies, and programs present within the Housing Element, adequate sites should accommodate the Regional Housing Needs Allocation in a manner that affirmatively furthers fair housing. The State requires sites identified as lower-income units to be in a zone that permits the City's default density<sup>24</sup> of 30 dwelling units per acre and be at least 0.5 acres in size. Some of the challenges in identifying sites in the City include lack of vacant land, lack of underutilized land, small parcel sizes, and limited overall land zoned to allow for 30 dwelling units per acre.

The majority of the City's land zoned for residential uses is zoned as Single-Family Residential (RS), which does not meet the default density of 30 dwelling units per acre as required by State law. In addition, provisions in Section 10.12.030 of the City's Planning and Zoning Ordinance do not allow the City to amend development standards related to increased density in residential zones without Citywide voter approval (refer to **Appendix C**). However, portions of the City's Medium-Density Residential (RM) Zoning District and all of the City's High-Density Residential (RH) and three Commercial Zoning Districts permitting mixed use and residential development (North End Commercial [CNE], Local Commercial [CL], and Downtown Commercial [CD]) meet the required default density.

As such, the City was able to identify select sites in the existing mixed-use commercial (CL and CNE) and High-Density Residential (RH) zones meeting the default density requirements. To accommodate the remaining lower-income Regional Housing Needs Allocation, the City has identified additional sites that will be made available within 3 years and 120 days from the beginning of the planning period as part of **Program 2, Adequate Sites**, of the Housing Element. Refer to **Appendix E, Sites Analysis and Inventory**, for a detailed description of the methodology.

The sites selected in **Appendix E** affirmatively further fair housing. All Census tracts in the City are shown on the 2020 Tax Credit Allocation Commission Opportunity Map and proposed 2021 Map as areas of highest resource or high resource. As such, sites selected to accommodate lower-income housing are considered to have access to resources. No part of the City is designated as an area of high segregation. As previously described, the City is primarily non-Hispanic White, with approximately 73 percent of the total population; there is no concentration of other racial or ethnic groups in the City that would constitute a highly similar and segregated area, and, as a consequence, the designated sites will not increase segregation in the City. Because the City has identified adequate sites to accommodate the moderate- and above moderate-income Regional Housing Needs Allocation, no rezone program in the Housing Element is needed for the City's moderate- or above moderate-income Regional Housing Needs Allocation for the planning period. The selected sites are located throughout the City, and lower-income sites are in areas with high median household income, which will improve conditions and create mixed-income neighborhoods with high access to resources and improve the quality of life for all residents. The selected

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<sup>24</sup> "Default Density" per Government Code Section 65583.2(c)(3)(B) allows local governments to use "default" density standards deemed adequate to meet the appropriate zoning for lower-income units.

sites for all income levels, coupled with the programs in the Housing Element incentivizing development in the City, will improve conditions related to substandard housing and displacement by creating opportunities for an increased supply of affordable and market-rate housing in the City.

## 6 Identification and Prioritization of Contributing Factors

An analysis of the contributing factors to fair housing is used to inform the strategies employed by the Housing Element for Affirmatively Furthering Fair Housing. The key issues identified through analysis can be found in **Section 4.8, Summary of Fair Housing Issues**. Although the City benefits from low rates of poverty, high household median income, and access to educational and economic opportunities, some households may suffer from housing discrimination that is prompted by land use and zoning practices, high housing costs, reluctance for change, and poor outreach. The abundance of single-family housing stock in combination with high income households creates a barrier for diverse housing opportunities suitable for lower income households, disabled persons, and racial and ethnic minorities. Trends have resulted in residential segregation and causes the City to be less diverse than the region in regard to wealth and demographics. To better meet the needs of the population, the City will provide fair housing opportunities that will improve access to resources, provide upward mobility, and allow for an integrated community, especially for populations that have historically and currently face discrimination.

### 6.1 Prioritization of Contributing Factors and Actions Designed to Meaningfully Address Contributing Factors

The following lists and prioritizes those factors that contribute to fair housing issues in Manhattan Beach and includes the City's priorities for addressing impediments to fair housing issues:

1. **Land Use and Zoning.** Land use and zoning is a key contributing factor for the lack of diversity in the types of housing available. An increase in the diversity and supply of the City's housing stock can help to increase opportunities for lower-income households, those with disabilities, and increasing options for a more diverse population. The City is largely single-family residential, which is a low-density housing type and historical mansionization of single properties has further reduced existing densities in neighborhoods. Per HCD's guidance on zoning barriers for persons with disabilities, the lack of a variety of housing types and zoning capacity for multifamily development in the City is considered a barrier because the majority of land permitting residential uses is currently zoned as Single-Family Residential (RS), which aims to provide opportunities for single-family residential land use in neighborhoods. The City has resources in place for persons with disabilities, such as a reasonable accommodation request process to accommodate special needs and allow for supportive housing in all residential zones. Programs in the Housing Element, such as **Programs 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts**, the City will further facilitate affordable housing development through the removal of discretionary requirements when a development utilizes the Density Bonus program. Through **Program 21, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**, the City will amend existing reasonable accommodation procedures and will promote the availability of this program through outreach.

Through **Program 28, Specialized Housing Types to Assist Persons with Special Needs**, the City will increase development opportunities for Emergency Shelters, Supportive Housing, and Low-Barrier Navigation Centers, creating pathways to long-term solutions for extremely low-income households and those experiencing homelessness. Additionally, **Program 28** will increase the variety of housing types and facilitate the development of multifamily housing for employee housing for agricultural workers.

The Adequate Sites Program, **Program 2**, of the Housing Element, will increase available land in the City that permits 100 percent multifamily residential uses, set a minimum density requirement of 20 units per acre, and allow by-right development for developments in which 20 percent or more of the units are affordable to lower-income households, increasing available capacity and opportunities for an increased variety of housing types. **Program 1** of the Housing Element will incentivize the development of accessory dwelling units (ADUs) and junior ADUs, and specifically promote the creation of ADUs that can be offered at an affordable rent for extremely low-, very low-, low-, or moderate-income households. Through the Density Bonus Program, **Program 11** of the Housing Element, the City will implement needed updates to its Density Bonus Ordinance, consistent with State law, and offer a streamlined approval process for projects that qualify for a density bonus (see **Program 18** of the Housing Element for details). Through the removal of discretionary requirements for multifamily housing, the City will minimize constraints to the development of affordable housing. In addition, as part of **Program 16, Lot Consolidation Incentive**, the City provides an additional density bonus incentive under Section 10.12.030 of the Manhattan Beach Municipal Code above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus to further incentivize development of affordable housing. The City will continue to offer the lot consolidation incentive throughout the 6<sup>th</sup> Cycle to further facilitate multifamily residential developments, especially those offering affordable housing opportunities. These programs are the City's priorities for addressing the lack of variety in housing types and will increase diversity among the City's housing stock.

These programs aimed to address land use and zoning will increase the City's housing stock and variety of housing types, creating new opportunities for increased diversity in household income and household demographics.

2. **Voter Initiatives.** Voter initiatives is a key contributing factor for the lack of diversity in the types of housing available. While the City has not experienced formidable opposition to the development of affordable housing in its neighborhoods, voter initiatives that prevent changes to many existing development regulations contribute to the lack of diversity in housing types. Due to an existing voter initiative, development regulations in the RS, RM, and RH residential zoning districts cannot be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit, unless the amendment is first submitted to a Citywide election and approved by a majority of the voters. According to HCD's AFFH guidance, this is considered a measure that limits housing choices. The voter initiative is a unique barrier to

the production of housing in the City; therefore, the City has committed to the following programs that will allow them to meet their housing needs despite this barrier.

As noted in the Sites Inventory (**Appendix E**), vacant land is extremely scarce in the City, and adequate sites for lower-income housing, based on Housing Element law criteria, are currently limited. Therefore, **Program 2, Adequate Sites**, of the Housing Element would increase the availability of parcels zoned to allow sufficient density to accommodate the economies of scale needed to produce affordable housing as required by State law, and specifically incentivize lower-income housing development. The ADU Program will also aim to increase density in residential and mixed-use zones by incentivizing the development of ADUs and junior ADUs, which recent development trends have proven to effectively increase housing opportunities in the City. Due to limitations attributed to the existing voter initiative, the City has committed to programs to attenuate this barrier to a variety of housing types by increasing residential opportunities within commercial zones. Residential development is currently allowed in the following commercial zones: CL, CD, and CNE. Through **Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts**, the City will amend its Zoning Code to adopt a streamlined approval process and development standards for multifamily residential and mixed-use projects in those commercial zones. This program will further incentivize and provide additional opportunities for multifamily development, especially where affordable housing is provided.

These programs will address land use and zoning constraints caused by the voter initiative, increasing the City's housing stock and variety of housing types, creating new opportunities for increased diversity in household income and household demographics.

3. **Affordable Housing.** The lack of affordable housing is a key contributor to the high cost of housing and is likely a contributor to the lack of racial and ethnic diversity in the City. Further, while the median household income of existing residents is high within the City, there are few opportunities for lower-earning households across the region to move into the City, creating a sense of exclusivity. The lack of affordable housing contributes to the high household income of the area, as there are few opportunities for lower-income earning households to enter the area. High housing costs have contributed to the areas identified as RCAAs because a higher income is needed to afford living in the City. This is a State-wide issue along the coastal cities in California. The City is incentivizing housing development by identifying adequate and viable sites to make available and accommodate affordable housing in the next 8-year planning period. **Program 1, Accessory Dwelling Units**, of the Housing Element incentivizes the development of ADUs that can be offered at an affordable rent for very low-, low-, or moderate-income households; **Program 2, Adequate Sites**, would allow for increased opportunities for affordable housing in the General Commercial (CG) and Planned Development (PD) zones, which have previously not allowed residential uses; **Program 12, Developer Outreach and Transparency**, provides developer outreach, such as regulatory education, and updates on local and State incentives for development; **Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts** creates residential development standards

and a streamlined approval process for multifamily and mixed-use projects in the CL, CD, and CNE commercial zones; and **Program 16, Lot Consolidation Incentive**, provides an additional density bonus for multifamily projects that qualifies for the State density bonus in exchange for lot consolidation. The City will continue to participate in the Section 8 housing voucher program, which provides rental assistance, and through **Program 15, Housing Choice Voucher Program**, the City is committing to better connect residents to County, State, Federal, and other housing assistance resources. Through **Program 28, Specialized Housing Types to Assist Persons with Special Needs**, the City will implement amendments to its zoning code to increase flexibility in regulations, creating increased opportunities for the development of employee housing, supportive housing, emergency shelters, and low-barrier navigation centers. As part of the Housing Element, these programs will further incentivize and provide additional opportunities for housing affordable to very low, low-, and moderate-income households, and those with special needs.

These programs will increase the supply of affordable housing and remove barriers to affordable housing for lower-income households, including extremely low-income households and those with disabilities, increasing opportunity for upward mobility and access to resources.

4. **Fair Housing Enforcement and Outreach Capacity.** The City recognizes the importance of educating residents and developers to reduce housing discrimination in the City. Although County and regional fair housing resources are available, the City only currently provides fair housing information and referrals upon request. Therefore, many residents and developers are not aware of available resources. Through **Program 14, Fair/Equal Housing Program**, the City will continue to support and participate in the Regional Analysis of Impediments to Fair Housing Choice in coordination with the County's Community Development Commission and HACoLA to continue identifying fair housing issues in the City; promote compliance with housing discrimination laws by developing a handout for developers to be made aware of fair housing advertisement material related to the sale or rental of housing pursuant to Government Code 12955, which prohibits such materials from indicating a preference or limitation based on a protected classification; and provide links to fair housing resources, including developer handout materials, on the City's website. Further, the City will administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing by developing a process that prompts the consideration of fair housing in the decision process. This process could include a requirement to have a statement of fair housing consideration on all decision letters or staff reports, whichever is applicable. Additionally, through **Program 25, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**, the City will remove potential barriers for people with disabilities, including persons with developmental disabilities, related to requests for reasonable accommodations, and in accordance with current fair housing laws and conduct outreach to promote reasonable accommodation procedures.

Through these programs the City will address issues related to land use and zoning, voter initiatives, affordable housing, and fair housing enforcement and outreach to improve the supply, affordability, and variety of housing types, increasing access to resources, opportunities for upward mobility, and allowing

for a more diverse community through increased opportunities for populations that have historically and currently face discrimination.

# Appendix E: Sites Analysis and Inventory

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# 1 Introduction

As provided under California State law (Government Code Sections 65583[a][3]), a General Plan Housing Element must include an inventory of land suitable for residential development, including vacant sites that can be developed for housing within the planning period, and non-vacant sites having realistic and demonstrated potential for redevelopment during the planning period to meet the local Regional Housing Needs Allocation (RHNA) at all income levels. As further detailed in the following discussion, every local jurisdiction is assigned a number of housing units representing its share of the State's housing needs for an 8-year planning period. The City of Manhattan Beach's (City) housing need for the 6th Cycle (8-year planning period [2021–2029]) consists of 774 total units, including housing at all income levels.

This appendix of the Housing Element contains an analysis and inventory of sites within City limits that are suitable for residential development during the planning period. State law requires a land inventory that relies largely on vacant sites, and if a City is relying on non-vacant sites, findings based on substantial evidence must be provided to demonstrate that the existing use does not constitute an impediment to additional residential development. However, the City is completely built-out, meaning that vacant sites are nearly nonexistent (further discussed in Section 3.1, Process Overview).

Furthermore, the lack of supply in vacant land currently available in the City is not something that the City can directly control. The City can only incentivize and promote redevelopment within the City, which is the intent of several programs in the Housing Element, such as **Programs 1, 2, 3, 8, 9, 11, 16, 18, 19, 22 and 30**. Although State law (Government Code Section 65583.2) presumes existing uses to be an impediment to additional residential development, because of the built out nature of the City, most development projects are on infill sites. Furthermore, with the booming housing market in California, the median home price in the City rose to \$2,923,949 as of August 2021, giving developers a large financial incentive to pursue redevelopment opportunities on non-vacant sites in the City.

As presented in this analysis, through the Sites Analysis for the 2021–2029 planning period, the City has identified capacity for 377 total units through underutilized sites, projected accessory dwelling units (ADUs), and pipeline projects, which are expected to receive Certificates of Occupancy within the planning period. The City has an adequate supply of land to accommodate the City's RHNA of 132 above moderate-income and 155 moderate-income units. The City has identified existing capacity to realistically accommodate 81 lower-income units through underutilized sites, projected ADUs, and pipeline projects. To meet the remaining RHNA for lower-income units, the City commits to **Program 2, Adequate Sites**, of the Housing Element, and has identified areas to increase capacity in the City to not only meet its housing need, but to ensure adequate capacity throughout the planning period through a generous buffer for additional lower-income sites that exceeds the City's RHNA (see Section 7, Sites Identified for Adequate Sites Program).

In conjunction with the sites identified for the Sites Inventory, the Housing Element programs will further support new development on sites identified at and above the corresponding capacity established for the respective sites. This Sites Analysis and Inventory describes the City's housing target for the 6th Cycle planning period (6th Cycle); provides an overview of the methodology for identifying underutilized sites; breaks down the methodology by which realistic development capacity was determined; identifies existing capacity for all RHNA income categories; evaluates development that is currently underway, which counts toward the City's housing need; details the expected number of ADUs

to be developed within the planning period; and summarizes the approach used for the identification of sites selected for the Adequate Sites Program of the Housing Element.

## 2 Regional Housing Needs Allocation

Pursuant to State law, each jurisdiction in the State has a responsibility to accommodate a share of the projected housing needs in its region. The process and methodology of allocating regional housing needs to individual cities and counties is conducted through an assessment of the region’s housing need, and the unit count allocated to cities and counties results in the RHNA. The RHNA is mandated by State housing law as part of the periodic process of updating local Housing Elements of General Plans, and the total number of units for each region is provided by the Department of Housing and Community Development (HCD). The RHNA quantifies the need for housing within each jurisdiction during specified planning periods.

As part of the assessment and allocation process, each council of governments must develop a methodology that determines each jurisdiction’s RHNA as a share of the regional determination of existing and projected housing need provided by HCD. Each jurisdiction’s RHNA is broken down by income category, ensuring that all economic groups are accommodated. The methodology generally distributes more housing, particularly lower-income housing, near jobs, transit, and resources linked to long-term improvements of life outcomes, and must further state objectives, including affirmatively furthering fair housing.

The City’s share of regional housing need was determined by a methodology prepared by the Southern California Association of Governments (SCAG) as part of its Final Regional Housing Needs Assessment Allocation Plan, adopted in March 2021 and updated June 2021. In accordance with the Final RHNA Allocation Plan, the City must plan to accommodate 774 total housing units for the projection period beginning June 30, 2021 and ending October 15, 2029. This is equal to a yearly average of approximately 93 housing units. The 774 total units are split into four RHNA income categories (very low, low, moderate, and above moderate). **Table 1, City of Manhattan Beach Regional Housing Needs Allocation 2021–2029**, provides the City’s RHNA by income category. Of the 774 total units, the City must plan to accommodate 322 units for very low-income households, 165 units for low-income households, 155 units for moderate-income households, and 132 units for above-moderate-income households.

<b>Table 1. City of Manhattan Beach Regional Housing Needs Allocation 2021–2029</b>		
Income Category	Units	Percent of Total
Very Low-Income	322	41.6%
Low-Income	165	21.3%
Moderate-Income	155	20%
Above Moderate-Income	132	17.1%
Total	774	100%

As shown in Table 1, the City must accommodate 774 total housing units from 2021 to 2029. To ensure that adequate capacity is maintained in the City throughout the 6th Cycle, additional capacity above and beyond the RHNA assigned to the City has been identified in this analysis. In accordance with State requirements, the City will monitor the housing capacity identified in the Sites Inventory throughout the planning period to maintain sufficient capacity for the remaining RHNA at all income levels.

### 3 Vacant and Underutilized Sites Methodology and Assumptions

State law requires each jurisdiction to include a land inventory to identify specific sites that are suitable for residential development and demonstrate that sufficient land is zoned to provide housing capacity that is adequate to meet the RHNA for each income level. This section of the Sites Analysis and Inventory describes the methodology used to calculate the housing capacity on all vacant and non-vacant developable land within the City limits that is zoned to allow for housing and available to develop within the Housing Element planning period.

#### 3.1 Process Overview

The Sites Analysis was completed using Geographic Information Systems (GIS) mapping software with multiple data sets to identify potentially available housing sites, largely depending on SCAG’s annual land use parcel-level dataset (ALU v.2019.2) available from SCAG’s open GIS data portal, last updated in June 2021. SCAG’s land use dataset provides extensive parcel-level data, including existing land uses, mainly based on 2019 Tax Assessor records.<sup>1</sup> The City is nearly completely built-out, meaning that vacant sites are nearly nonexistent, which was verified using the Tax Assessor land use codes. Local governments with limited vacant land resources may rely on non-vacant and underutilized residential sites to accommodate their RHNA. Although HCD’s Housing Element Site Inventory Guidebook (Government Code Section 65583.2) states that a “nonvacant site’s existing use is presumed to impede additional residential development,” the City’s opportunities for residential development depends on underutilized sites due to the lack of vacant land. Although some parcels identified have vacated uses, or are largely undeveloped, per HCD’s definition of vacant sites, all sites identified in this analysis are considered non-vacant. Further, all sites zoned for residential development in the City are already developed with residential units. Therefore, this Sites Analysis depends on those underutilized sites within City limits that are zoned to allow for residential development identified by their land-to-improvement ratio, age of buildings, existing uses that may preclude development, proximity to resources and existing infrastructure, and other data indicating possible constraints to development feasibility. The specific factors for identifying and prioritizing underutilized sites are summarized as follows:

- **Building Age** – Buildings more than 30 years old. Building age is also a major factor influencing property valuation and land value. The age of housing is often an indicator of housing conditions. In general, housing that is 30 years or older is considered an older building as it may begin to need costly repairs.

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<sup>1</sup> Source of 2019 existing land use: SCAG\_REF – SCAG’s regional geospatial datasets; ASSESSOR – Assessor’s 2019 tax roll records; CPAD – California Protected Areas Database (version 2020a; accessed September 2020); CSCD – California School Campus Database (version 2018; accessed September 2020); FMMP – Farmland Mapping and Monitoring Program’s Important Farmland GIS data (accessed September 2020); MIRTHA – U.S. Department of Defense’s Military Installations, Ranges, and Training Areas GIS data (accessed September 2020).

- **Under Valued** – An assessed land-to-improvement (LTI) ratio less than 1. Improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value.
- **Underbuilt** – Commercially zoned sites where the current floor area ratio compared to the maximum allowable floor area ratio is less than 100 percent. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt.
- **Resource Access** – Within TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households.
- **Existing Use** – On the ground research informed the selection of sites to ensure that existing uses can realistically be redeveloped within the planning period. This includes knowledge of existing long-term leases and existing known vacancies.
- **Local Knowledge** – City knowledge of property owner interest to sell or of developer interest to redevelop was utilized to identify non-vacant sites regardless of the factors listed above.

The sites identified as underutilized include a mix of underutilized uses such as dilapidated parking lots, automotive repair shops, office spaces and restaurants with large surface car lots, and single-family residential units zoned for commercial and allowing multifamily and mixed-use developments. The underutilized sites are not known to have been occupied in the past 5 years with housing occupied by lower-income residents. Nonetheless, the City will mandate replacement requirements pursuant to the requirements as set forth in Government Code Section 65915, subdivision (c)(3) on sites identified in the Sites Inventory through **Program 26, Replacement Requirements**, of the Housing Element. In addition, online mapping tools—including Google Earth, Google Maps, and Los Angeles County Office of the Assessor Property Assessment Information System—as well as City knowledge of the current projects in the pipeline and development interest in certain areas of the City were used to verify underutilized status and existing uses. **Table 2, Underutilized Site Capacity**, provides a summary of existing capacity units identified by income category.

Table 2. Underutilized Site Capacity			
Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
24	158	19	201 units

### 3.2 Sewer, Water, and Environmental Constraints

Environmental and infrastructure constraints cover a broad range of issues affecting the feasibility of residential development. All parcels included in the Sites Inventory were reviewed for any known environmental constraints, sewer and water capacity, and dry utilities. The sites included in the inventory have all been designated for residential development, have access to existing sewer and water capacity and dry utilities, and are not constrained by known site-specific or environmental constraints that would limit development. Land suitable for residential development must be appropriate and available for residential use in the planning period. As such, the sites were also reviewed according to their development standards and regulations, as well as recently approved or built residential projects in the same zones where housing is an allowed use. Sites in the General Commercial (CG) and Planned Development (PD) Districts that require an overlay or rezoning to permit residential uses were also

included in the Site Analysis based on the Adequate Sites Program included in the Housing Element required to address an RHNA shortfall. See Section 7, Sites Identified for Adequate Sites Program, for details.

### 3.3 Density and Affordability Assumptions

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, the local government to demonstrate that the projected residential development capacity of the sites identified in the Housing Element can realistically be achieved. The following subsections provide an analysis of the realistic capacity assumptions per income level identified in zones allowing for residential uses.

#### 3.3.1 Lower-Income Units

Realistic capacity may be determined by utilizing established minimum densities to calculate the housing unit capacity or utilizing factors such as development trends of existing or approved residential developments at a similar affordability level in the City. The City does not have established minimum densities in the City; therefore, the Sites Inventory develops the realistic capacity for residential zones by analyzing development trends in the City (**Table 3, Development Trends**), planned development projects, and local knowledge to calculate lower-income units in the City.

As a conservative estimate of capacity calculations, the Sites Analysis estimates realistic capacity is 20 dwelling units (du) per acre for the City's Medium-Density Residential (RM) zone in Area District III, and for the High Density Residential (RH), Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts (I through IV) for sites identified to accommodate the City's lower-income RHNA (see **Table 4, Lower-Income Units Density Assumptions by Zone**). The RM zone in Area District III and RH, CL, CD, and CNE zones in Area Districts I through IV are analyzed for lower-income units as these zones meet the City's default density of 30 dwelling units per acre (See **Section 4.1, Lower-Income Sites** for more details). Table 3 includes an analysis of residential and mixed-use development projects from 2019 and 2020, and prospective projects. Recent development examples shown in Table 3 indicate that an average of 90 percent of the maximum density was achieved in residential and commercial zones. Since most development in the City has been for moderate- and above moderate-income housing units, the analysis also considers two planned projects which include an affordability component. A project located at 401 Rosecrans Avenue known as Verandas includes a total of 79 units with 73 above moderate-income units and 6 very low-income units. And a project located at 1701 – 1707 Artesia which includes a total of 14 residential units, 13 of which are for above moderate-income households and 1 affordable to very low-income households. The Verandas and 1701 – 1707 Artesia projects achieved 152 percent and 117 percent of the maximum density dwelling units per acre allowed under each respective zone (see **Section 5, Planned, Approved, and Prospective Projects** for more details).

Another factor informing the realistic capacity for lower-income units is the potential for mixed-use projects and nonresidential development in zones that allow 100 percent nonresidential development (CL, CD and CNE zones). As such, recent development trends were analyzed to capture the potential for nonresidential development to inform the realistic capacity. The aforementioned 1701 – 1707 Artesia, is a recent planned mixed-use development project in the City. This project is located in the CL zone which is a mixed-use zone that allows 100 percent nonresidential development. As detailed in **Section 5.2, 1701-1707 Artesia**, this project includes 649 square feet of commercial space and 14 residential units. The CL zone in Area District I allows for a maximum 43.6 dwelling units per acre; however, utilizing a

density bonus as permitted under State law, the project achieved a density of 46.6 dwelling units per acre. Regardless of the commercial component, the project was able to exceed the maximum permitted density, achieving 117 percent of the maximum density permitted. The Verandas project is located in the CNE zone, Area District III which allows a mix of uses and maximum density of 51.2 dwelling units per acre. Although the site allows for the development of nonresidential uses and is located in an area where mixed-use development is commonplace, the development is 100 percent residential and does not include a mixed-use component. Furthermore, the developer used incentives including a density bonus as permitted under State law and a density bonus provided through the City's lot consolidation incentive. Therefore, the project achieved a density of 79 dwelling units per acre, much higher than the 51.2 dwelling units per acre permitted by the zone. The examples provided coupled with local knowledge of developer interest for residential development in the City support the likelihood that the two sites identified in zones that allow for nonresidential uses in **Table 7, Lower-Income Sites**, are highly likely to develop as residential uses.

The realistic capacity for lower-income sites of 20 dwelling units per acre is relatively low considering that the aforementioned zones allow up to a maximum density of 32.3 to 51.2 dwelling units per acre. As is later detailed in Section 4.1, the Sites Inventory was able to identify existing capacity for three sites adequate for lower-income capacity. Two of the three sites identified in Table 7 (Table ID 1 and 2) are located in commercial zones CL Area District I and CNE Area District III which permit a maximum capacity of 43.6 and 51.2 dwelling units per acre, respectively (see Section 4.1 for site details). A realistic capacity of 20 dwelling units per acre is approximately 48.8 percent and 39 percent of the maximum density allowed in each zone. Sites identified as Table ID 1 and 2 also have parcels that were previously identified as non-vacant sites in the 5th Cycle Housing Element and are subject to **Program 7, By-Right Development**, which allows developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households. Additional incentives for residential development include the State density bonus (**Program 11, Density Bonus**), which has been used on various projects in the City, the City's lot consolidation incentive (**Program 16, Lot Consolidation Incentive**) which allows for an additional density bonus beyond what is permitted under State law. Given recent development trends in the City, it is evident that developers are utilizing these incentives to increase and develop residential projects at densities above what is permitted under either the Zoning Code or General Plan. Further, the

In conclusion the realistic capacity of 20 dwelling units per acre considers the development trends over the last three years at 90 percent capacity achieved, planned projects with affordable housing components achieving at least 117 percent of the maximum capacity, planned development and developer interest for residential development in mixed-use zones, and high maximum densities allowed per zone. Therefore, the realistic capacity is a very conservative assumption as it is below 50 percent of what is allowed per the base zones and considers the potential for commercial development on mixed-use sites by providing a generous buffer in the calculation. With high land values and limited vacant land available in the City, it is expected that property owners will strive for densities closer to or above the maximums.

Table 3. Development Trends								
APN	Address	Zone	Area District	Acres	Max Units Under Zone	Units Permitted	Percent Capacity Achieved	Date Permit Issued
4176030008	2709 Manhattan Blvd	RH	II	0.058	2.97	2	100%	Jul-20
4175023013	3405 Bayview Dr	RH	III	0.04	2.04	1	50%	30-Sep-19
4179026014	117 13th St	RH	III	0.045	2.30	1	50%	2-Dec-19
4177009028	428 24th St	RM	III	0.031	1.00	1	100%	19-Mar-19
4166009004	1450 12th St	RH	II	0.161	7.013	4	57%	23-Oct-19
4166009005	1446 12th St	RH	II	0.16	6.96	4	67%	23-Oct-19
4180022015	120 4th St	RM	III	0.062	2.00	2	100%	1-May-19
4164001021	1843 11th St	RH-D2	I	0.1492	3.58	3	100%	29-Jul-19
4176027017	3009 Manhattan Ave	RH	III	0.031	1.58	1	100%	9-Oct-19
4175023014	3400 Manhattan Ave	RH	III	0.08	4.09	2	50%	28-Aug-19
4180026014	124 6th St	RM	III	0.06	1.93	1	100%	30-Sep-19
4177013009	2604 Alma Ave	RM	III	0.08	2.58	2	100%	28-Aug-19
4177015015	323 25th St	RM	III	0.06	1.93	1	100%	23-Jul-19
4176014014	409 30th St	RM	III	0.0403	1.30	1	100%	7-Aug-19
—	401 Rosecrans Blvd	CNE	III	1.02	52.27	79	152%	In process
—	1701–1707 Artesia Blvd	CL	I	0.30	12	14	117%	In process
Total	—	—		2.37	99	119	90%	—

APN = Assessor's Parcel Number

Table 4. Lower-Income Units Density Assumptions by Zone				
Area District	Maximum Density (units per acre)		Realistic Density (units per acre)	
	Medium Density Residential Zone (RM)	High Density Residential (RH)*	Medium Density Residential Zone (RM)	High Density Residential (RH)*
I	—	43.6 per acre	—	20 per acre
II	—	43.6 per acre	—	20 per acre
III	32.3 per acre	51.2 per acre	20 per acre	20 per acre
IV	—	51.2 per acre	—	20 per acre

Source: City of Manhattan Beach  
 \* CL, CD, and CNE zones are subject to the development standards in the RH zone and applicable Area District.

### 3.3.2 Moderate- and Above Moderate-Income Units

Sites identified to accommodate the City’s moderate- and above moderate-income RHNA have been calculated assuming a conservative 80 percent of the maximum permitted density in the respective zone. Development trends from 2019 and 2020, and prospective projects indicate that 90 percent of maximum capacity was achieved (see **Table 3, Development Trends**). Most of these projects were for moderate and above-moderate units—with recent planned developments which include an affordable housing component. Therefore, it is assumed that a buffer is provided through this conservative estimate of capacity. Parcel size is also considered in this analysis, as the average parcel size in zones that allow residential uses is approximately 0.09 acres and the median parcel acreage is 0.06. Since parcel sizes are very small, most developers will use the maximum density allowed to increase their

return on investment. Recent development trends also indicate that developers are using City incentives to increase their density maximums. For example, Verandas is a residential development which provides 73 units affordable to above moderate-income households and 6 units to lower-income households (see Section 5.1 for details). While the base zone CNE, Area District III, allows for up to 51.2 dwelling units per acre, through State density bonus and lot consolidation incentives, the developer was able to increase development by 27 units (152 percent capacity achieved). As is later detailed in **Section 4.2, Moderate Income Sites** and **4.3, Above Moderate-Income**, sites identified in **Table 8, Moderate-Income Sites Identified**, and **Table 9, Above Moderate-Income Sites Identified**, were selected in the residential and mixed-use zoning districts (CL, CD, and CNE). As was previously discussed in **Section 3.3.1, Lower-Income Units**, residential developments in the City on nonresidential zones were able to achieve or exceed the maximum density allowed regardless of a commercial mixed use component. Nevertheless, the potential for nonresidential development on mixed-use zones sites is considered in the realistic capacity for moderate- and above moderate-income sites. The realistic capacity considers average parcel size, local knowledge of developer interest for residential development, development trends at 90 percent capacity, and residential incentives such as Program 11 and Program 16 which allow for densities above what is permitted under the Zoning Code or General Plan. Table 3 provides a full list of development trends and corresponding densities in the City. **Table 5, Moderate- and Above Moderate-Income Units Density Assumptions by Zone**, provides an overview of the maximum and realistic capacity for each residential zone considered in the Sites Analysis for the moderate- and above moderate-income RHNA.

Area District	Maximum Density (units per acre)			Realistic Density (units per acre)		
	Single-Family Residential Zone (RS)	Medium Density Residential Zone (RM)	High Density Residential (RH)*	Single-Family Residential Zone (RS)	Medium Density Residential Zone (RM)	High Density Residential (RH)*
I	5.8 per acre	11.6 per acre	43.6 per acre	4.6 per acre	9.3 per acre	34.8 per acre
II	9.5 per acre	18.9 per acre	43.6 per acre	7.6 per acre	15.2 per acre	34.8 per acre
III	25.6 per acre	32.3 per acre	51.2 per acre	20.5 per acre	25.8 per acre	41 per acre
IV	—	—	51.2 per acre	—	—	41 per acre

Source: City of Manhattan Beach  
 \* CL, CD, and CNE zones are subject to the development standards in the RH zone, and applicable Area District.

## 4 Existing Capacity

### 4.1 Lower-Income Sites

In accordance with Housing Element law (Government Code Section 65583.2[c][3]), the City’s default density for accommodating capacity for lower-income units (322 very low-income units and 165 low-income units) requires zoning that permits a minimum of 30 dwelling units per acre because the City is considered a metropolitan jurisdiction. The City has five zones that permit densities of 30 dwelling units per acre or greater: the RM zone, in only Area District III; RH zone in any Area District; and the CL, CNE, and CD zones, which are subject to the development standards for multifamily housing in the RH zone. Although there are many zones that permit the default density considered adequate for lower-income units, the Sites Inventory was only able to identify existing capacity for 24 units on 3 sites. There are no



vacant parcels available in the City that can accommodate lower-income units, therefore, the Sites Inventory relies on non-vacant sites as detailed in **Section 3, Vacant and Underutilized Sites Methodology and Assumptions**. This section will provide an overview of the challenges and limitations the City experienced in identifying lower-income sites compliant with State law including size of sites and existing uses on non-vacant parcels, followed by a site level analysis.

#### 4.1.1 Size of Sites and Lot Consolidation

State guidance indicates that sites that are too small or too large may not facilitate developments affordable to lower-income households. Government Code Section 65583.2(c)(2)(A)(B) requires sites identified for lower-income units be limited to 0.5 to 10 acres. To meet the minimum acreage, a site may include two or more smaller parcels that have a realistic potential to be consolidated and developed into one site. In selecting sites for lower-income units, given the criteria, the City experienced various limitations and challenges identifying sites that met the size criteria. As previously mentioned, although the City has five zones that permit a minimum of 30 dwelling units per acre, the median parcel size is approximately 0.06 acres. Therefore, opportunities for identifying contiguous and underutilized parcels that can reasonably be expected to be consolidated as one site are limited. Sites smaller than 0.5 acres are deemed inadequate to accommodate development for lower-income housing unless evidence or recent trends can prove otherwise. As shown in Table 3, 15 of the 16 development projects over the last 3 years have been located on sites smaller than 0.5 acres, which is reflective of the average parcel size in the City being far below 0.5 acres. Although not all of the projects built in the last 3 years have included an affordable housing component, it can be assumed, based off these trends and existing opportunities for small site development, that developer interest in building housing affordable to all income levels on sites smaller than 0.5 acres will continue into the 6th Cycle. Furthermore, a recent planned development, 1701 – 1707 Artesia, has an affordable housing component and is built on a 0.30-acre site. This small site combined two parcels to achieve the 0.30 acres. Therefore, this site supports the assumption that lower-income sites in the City will be developed on sites smaller than 0.5 acres. The three sites identified do not meet HCD's minimum acreage criteria and are just under 0.5 acres (see **Table 7**) and are considered adequate for lower-income development based on the median parcel size in the City, development trends on small sites, and planned projects with affordable housing built on consolidated sites less than 0.5 acres.

Further, a study of current properties on the market zoned for multifamily development in the City and surrounding cities including Redondo Beach, Hermosa Beach, and El Segundo, revealed that the median parcel size for multifamily development lots is 0.06 acres. Lot acreages ranged from 0.03 acres to 0.17 acres. A notable multifamily development on the market located in El Segundo, included a 31-unit development on a 0.13-acre lot. Through market trends, it is clear available properties have small parcel sizes and can be assumed that development for lower-income sites will be built on sites smaller than 0.5 acres and developed at densities higher than the realistic capacity of 20 dwelling units per acre. The following subsections below (**4.1.3.1 - 4.1.3.3**) provide site specific details of how the City will ensure small sites can adequately accommodate the lower-income RHNA.

The analysis also considers the likelihood that sites with multiple parcels can be consolidated. Two sites identified for lower-income development (Table ID 1 and 2) include multiple parcels and are identified as consolidated sites. Since most parcels in the City are small, it can also be assumed that developers will consolidate parcels, as is supported by recent planned projects, Verandas and 1701 – 1707 Artesia, which include consolidated parcels. The City also provides several incentives to encourage and facilitate

the development of lower-income housing through various programs. Through Program 16, the City provides an additional density bonus in exchange for lot consolidation on sites greater than 0.5 acres, and sites greater than 0.3 acres that are identified to accommodate the RHNA in the Sites Inventory. Again, this incentive was utilized by Verandas planned development project to increase their density. And as part of Program 16 the City will also assist affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database. Through Program 11, developers may also increase their density in exchange for affordable housing, pursuant to State law. The following subsections below (4.1.3.1 - 4.1.3.3) provide site specific details of how the City will ensure sites identified for consolidation can adequately accommodate the lower-income RHNA.

#### 4.1.2 Non-Vacant Parcels

All three sites identified as having the capacity to accommodate lower-income housing were identified on parcels considered to be underutilized. As previously mentioned, there are no available vacant parcels in the City and all residential zoned land in the City is already developed with residential uses. Therefore, in selecting sites for the lower-income RHNA, the Sites Inventory analysis considered the factors listed under **Section 3.1, Process Overview**. The factors include building age, specifically, buildings more than 30 years old. Building age is a major factor influencing property valuation and land value as the age of housing is often an indicator of housing conditions. In general, housing that is 30 years or older is considered an older building as it may begin to need costly repairs. The second factor is identifying sites that are undervalued, specifically, with an assessed land-to-improvement (LTI) ratio less than 1. Improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value. The third factor is underbuilt sites, this specifically identified commercially zoned sites where the current floor area ratio compared to the maximum allowable floor area ratio is less than 100 percent. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt. The fourth factor is resource access which looks at TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households. Lastly, sites were identified utilizing City local knowledge of property owner interest to sell or of developer interest to redevelop.

The sites selected in Table 7, are likely to be developed for lower-income RHNA as the existing structures are not considered an impediment to development due to their current uses, building age, current conditions indicating a likely need for substantial repairs, and low LTI ratios as described above. Two of the sites include two or more parcels with the realistic potential for consolidation: sites identified as Table ID 1 and 2. Based on recent trends for projects in the pipeline, which include the redevelopment of underutilized parcels consolidated into one project site (see **Section 5, Planned, Approved, and Prospective Projects**), it is reasonable to assume that sites identified as Table ID 1 and 2 can be consolidated as one site. Similar to the projects in the pipeline, the uses on these lots are underutilized, and programs in the Housing Element provide incentives for lot consolidation. For example, Program 16, provides an additional density bonus above and beyond what is permitted under State law and includes provisions for the City to assist affordable housing developers in identifying opportunities for lot consolidation. The existing Manhattan Village Senior Villas located at 1300 Parkview Avenue, and the future Verandas Project located at 401 Rosecrans Avenue and the 1701–1707 Artesia Project are examples of residential projects developed on multiple parcels that include units affordable to very low-, low-, and moderate-income households. The Verandas Project and 1701–1707

Artesia Project are further detailed in Section 5 and are credited toward the 6th Cycle planning period RHNA. The following subsections below (4.1.3.1 - 4.1.3.3) provide site specific details of how the City will ensure existing uses can adequately accommodate the lower-income RHNA.

#### 4.1.3 Analysis of Impediments to Development on Underutilized Sites

Since there are no vacant parcels in the City, a common challenge was finding sites with existing uses that would not be considered an impediment for development of lower-income units. Specifically, identifying sites with existing residential uses which would yield a great amount of net new units. As previously mentioned, residentially zoned land in the City is already developed with residential uses. From a high-level overview there appears to be many contiguous parcels that could potentially accommodate lower-income units. However, when calculating the realistic capacity at 20 dwelling units per acre, many parcels yielded negative or 0 net new units. Meaning that identifying these sites is not feasible as the units would only be replaced. Many parcels yielded low or negative net new units due to small parcel sizes and/or existing residential units built at higher densities. **Table 6, Example Site**, provides an example of one of the major and common challenges in identifying lower-income sites that meet both HCD’s criteria and yield enough net new units to be considered feasible from a redevelopment perspective. This is particularly important when identifying lower-income sites because existing uses cannot be an impediment to development. While the parcels in the example site can be consolidated to meet the acreage criteria, only five net new units are yielded when accounting for the existing 19 units and their current tenants—likely rendering the site unfeasible from an affordable housing development perspective.

Table 6. Example Site				
Assessor’s Parcel Numbers	Acres	Uses	Existing Units	Net New Units
4167-014-017 4167-014-016 4167-014-015 4167-014-014	0.56	Four quadplexes	19	5

To ensure net new units when identifying existing capacity for redevelopment across all income levels in the City and in compliance with Senate Bill 330 (2019), the approach used was to focus on parcels with commercial uses that permit residential development because those generally yielded a higher number of units. And as previously discussed in Section 3.3.1, development trends in the City indicate residential properties developed on commercial zoned properties typically achieve the maximum density. As such, the realistic capacity considered the development on residential properties on commercially zoned parcels. Many of the parcels were then filtered out because their existing uses were considered an impediment to development (e.g., well-known franchises) because it was not foreseen that the nature of the business would discontinue within the planning period. However, the underutilized sites ultimately selected for accommodating the lower-income RHNA have existing uses that are not considered an impediment to development, and their current uses are reasonably assumed to be discontinued during the planning period. The following subsections below (4.1.3.1 - 4.1.3.3) provide site specific details of how the existing uses are not an impediment to lower-income RHNA. Table 7 details the underutilized sites identified as appropriate to accommodate the lower-income RHNA and expected net new units based on the realistic capacity assumptions.

**Table 7. Lower-Income Sites Identified**

Table ID	APNs	Consolidated Site Letter	Address	Zone	Area District	Acres	Existing Uses	Net New Units
1	4137-001-900* 4137-001-904 4137-001-905 4137-001-906	A	Rosecrans Ave./ Highland Ave.	CNE	III	0.33	City-owned parking structure (APNs 4137-001-900, 4137-001-904, 4137-001-905, 4137-001-906).	6
2	4170-026-003* 4170-026-004*	B	1026–1030 Manhattan Beach Blvd.	CL	I	0.49	Remax offices, stand-alone building with a surface parking lot (APN 4170-026-003, LTI ratio 0.30, built 1953) and two-story stand-alone vacated Pilates studio with surface parking lot (APN 4170-026-004, LTI ratio 0.38, built 1964).	9
3	4163-024-028	N/A	1535 Artesia Blvd.	RH	I	0.46	Masonic Center with surface parking lot (LTI ratio 0.97, built 1963).	9
Total	—	—	—	—	—	1.28	—	24

Notes: Parcels with an asterisk (\*) are non-vacant parcels identified in the 5th Cycle Housing Element.  
APN = Assessor's Parcel Number; LTI = land-to-improvement

#### 4.1.3.1 Site 1

Site 1, labeled as “Table ID 1” in Table 7, is composed of four parcels reasonably expected to be consolidated into one site and totals 0.33 acres to identify 6 net new units. The use is a parking lot facility made up of four City owned parcels (APNs 4137-001-900, 4137-001-904, 4137-001-905, 4137-001-906).

The parking lot facility is not considered to be an impediment to development as the location is at the intersection of an area prime for redevelopment and recent development trends indicate parking lot redevelopment is feasible. For example, a proposed project in the City of Pasadena is slated to replace a parking lot with 105 residential units and also includes provisions for a semi-subterranean parking for 162 vehicles. Other examples of an increasing trend to redevelop parking spaces in Southern California include north of the City in the City of Santa Monica. The project includes the replacement of a parking lot facility in Downtown Santa Monica with an affordable housing component. The City of Mountain View in northern California has also recently approved a project from the nonprofit Alta Housing that would bring 120 affordable housing units to a city-owned parking lot. As vacant land has become scarcer, cities in California are looking to their city-owned parking lots as a mean to provide much needed affordable housing. Further, parking will not be lost as new development will require parking subject to the standards in the City’s Zoning Code. While the City does not currently have plans to sell the land, and the land is not designated as surplus land; if developer interest would arise, the City would work with the developer to analyze the feasibility of development, and comply with the guidelines and regulations outlined in Assembly Bill (AB) 1486, Surplus Lands Act. As part of **Program 30, Surplus Lands**, of the Housing Element, the City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Report in accordance with the requirements of AB 1486 (2019). If the City identifies any public land that they intend to declare as surplus land at any point, the City will send notices about available, surplus local public land to HCD, local public entities within the jurisdiction

where the surplus local land is located, and any developers who have notified HCD of their interest in developing affordable housing on surplus local public land in accordance with the requirements set forth in the Surplus Land Act (Government Code Section 54220-54234).

The four parcels have common ownership and through the lot consolidation program (Program 16) the City provides incentives for lot consolidation by allowing sites greater 0.3 acres identified in this Sites Analysis, an additional density bonus. Program 16 also includes provisions for the City to assist affordable housing developers in identifying opportunities for lot consolidation such as this one. It should also be noted that one parcel identified on this site (APN 4137-001-900) has been previously identified as a non-vacant site in the 5th Cycle, therefore, an additional incentive is available on this site through Program 7 which allows by-right development when 20 percent of the units proposed are affordable to lower-income households. This site has very strong redevelopment potential, and recent trends indicate this area is prime for redevelopment. Abutting this site is the location of a proposed 79-unit residential housing redevelopment project, detailed in Section 5.1, Verandas – 401 Rosecrans Avenue, which indicates developer interest for residential development in this area.

#### *4.1.3.2 Site 2*

Site 2, labeled as “Table ID 2,” is composed of two parcels reasonably expected to be consolidated into one site with a total acreage of 0.49 and 9 net new units located along Manhattan Beach Boulevard. Manhattan Beach Boulevard has a mix of existing uses, including commercial; retail; offices spaces; and residential units such as duplexes, condos, and apartments. One of the parcels currently has a vacated two-story building with a surface parking lot that was previously a Pilates studio (APN 4170-026-004). The use is not considered an impediment to development as the building is vacated, and the building is considered older, built in 1964, and undervalued as it has an LTI ratio of 0.38. The second parcel, APN 4170-026-003, is an irregularly shaped stand-alone building occupied by Remax real estate agency with surface parking in the rear. The building is considered underutilized, and the use is expected to discontinue within the planning period as the building is over 58 years old and is beginning to need major repairs. The LTI ratio was also analyzed to determine the potential for redevelopment. With a low LTI ratio of 0.30, it can be expected that this site will draw developer interest as the assessed value of the land is greater than the assessed improvement value, meaning there is a higher return on investment. The parcels are owned by individual entities and do not share common ownership; however, this is not considered to impede lot consolidation as recent projects in the City have successfully consolidated parcels that did not share ownership (see Section 5.2 for details). Again, through Program 16, the City is facilitating lot consolidation on this site by providing density incentives for sites identified in the Sites Inventory greater than 0.3 acres. Further both parcels have been previously identified as non-vacant sites in the 5th Cycle, therefore, an additional incentive is available on this site through Program 7 which again allows by-right development when 20 percent of the units proposed are affordable to lower-income households. Considering the nature of the underutilized sites, and factors described above, the site is prime for redevelopment. Through programs and incentives in the housing element, the City is ensuring the site can realistically be developed for lower-income households.

#### *4.1.3.3 Site 3*

Site 3, labeled as “Table ID 3,” is a square-shaped parcel with a standalone building oriented toward the northside of the property. The parcel, APN 4163-024-028, is currently the location of the Beach Cities

Masonic Center with a large surface parking lot on the southern area of the lot. The site is located along Artesia Boulevard and is surrounded by multifamily residential uses along Artesia Boulevard, and single-family residential housing to the rear of the property north of the property line. The use itself is not a franchise nor considered an essential business and is considered marginal. Thus, the use will not impede residential development. Additionally, the conditions of the building and parking lot are in need of repair. The building is 59 years old, built in 1963, and has an LTI of 0.97, which indicates the land is undervalued. An improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value.

Site 3 is located in an area of the City where there is both developer and property owner interest to redevelop and sell property. Site 3 is located one block west of the planned mixed-used commercial and residential project detailed in Section 5.2. West of Site 3, on the northeast corner of Sepulveda Blvd. and Artesia Blvd., there is known interest from the property owner to sell this commercial property. Site 3 does not require lot consolidation but is considered a small site under HCD criteria, this residential parcel is one of the larger parcels found in the City at 0.46 acres as the median parcel size in the City is 0.06 acres, see **Section 4.1.1, Size of Sites and Lot Consolidation**, for details. Nonetheless, through programs in the Housing Element the City is facilitating potential development on this site. For example, through Program 11, the project may qualify for a density bonus pursuant to the requirements under State law. Through **Program 12, Developer Outreach and Transparency**, the City will work with the development community to identify ways that lower-income housing may be provided and will educate developers as to how density bonus regulation could be used to facilitate the development of affordable housing.

#### 4.1.4 Sites Identified in Previous Housing Elements

Per Government Code Section 65583.2(c), a non-vacant parcel identified in a previous planning period cannot be used to accommodate the lower-income RHNA unless the parcel is subject to a program in the Housing Element to allow residential uses by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households. As described in the site-specific analysis in the section above, the City has identified three non-vacant parcels (Assessor's Parcel Number 4137-001-900, 4170-026-003, and 4170-026-004. See Table ID 1 and 2 in Table 7) to accommodate lower-income units that were previously identified in the 5th Cycle Housing Element. Therefore, the subject sites (Table ID 1 and 2 in Table 7) are subject to Program 7, of the Housing Element for previously identified sites per State law.

## 4.2 Moderate-Income Sites

Sites inventoried at the moderate-income level were identified in the RM, RH, and commercially zoned districts permitting multifamily and mixed-uses (CL, CNE, and CD). Although the minimum acreage criterion does not apply to these moderate-income sites, there were limited sites available when considering the underutilized methodology previously described (building age, undervalued, and underbuilt). A total of 24 sites were identified on non-vacant parcels considered underutilized with a total of 158 net new units. Of the 24 sites, 10 sites include the potential for consolidating parcels. The sites which include multiple parcels were selected as such due to the similar conditions of the abutting parcels including undervaluation, building age, and underbuilt. Through Program 16 of the Housing Element, the City is supporting the consolidation of these sites as it incentivizes lot consolidation by providing a density bonus for sites greater than 0.3 acres identified in the Sites Inventory.

The general uses of the sites identified included commercial, retail, and some older residential uses. Again, uses such as franchises were filtered out of the sites inventory. The Sites Inventory analysis focused on selecting sites which showed a visual need for repair, were undervalued, older buildings and have a vacated status or an existing use that is considered marginalized and expected to be discontinued in the planning period. Most of the buildings were built before 1970, and the average LTI ratio is 0.38. Again, many of the buildings visually appear to be in need of repair, and some had uses that were recently vacated. **Table 8, Moderate-Income Sites Identified**, lists the underutilized sites identified to meet the moderate-income RHNA, a description of the existing uses, and expected net new units based on the realistic capacity assumptions identified on Table 5.

**Table 8. Moderate-Income Sites Identified**

Table ID	APNs	Consolidated Site Letter	Address	Zone	Area District	Acres	Existing Uses	Net New Units
4	4164016002 4164016003 4164016001	C	Manhattan Beach/Harkness	CL	I	0.34	Stand-alone building with a vacated commercial space (APN 4164016002, LTI ratio 0.70, built 1952); stand-alone building with a vacated office space (APN 4164046003, LTI ratio 0.26, built 1952); mixed-use lot with a commercial building built in 1952; one residential unit building built in 1954 (APN 4164016001, LTI ratio 0.20).	11
5	4164016010	N/A	1716 Manhattan Beach Blvd	CL	I	0.11	Stand-alone real estate office (LTI ratio 0.15, built 1955).	4
6	4170010014	N/A	939 Manhattan Beach Blvd	CL	II	0.09	Two-story beauty salon (LTI ratio 0.19, built 1958).	3
7	4170011015 4170011014	D	Walnut/Manhattan Beach	CL	II	0.20	Law office with surface parking (APN 4170011015, LTI ratio 0.50, built 1952); stand-alone dentistry office with surface parking (APN 4170011014, LTI ratio 0.69, built 1964).	6
8	4170011010 4170011011 4170011012	E	Poinsettia/Manhattan Beach	CL	II	0.29	Stand-alone tax attorney office with surface parking (APN 4170011010, LTI ratio 0.64, built 1963); two-story real estate agent office with surface parking (APN 4170011011, LTI ratio 0.42, built 1948); vacated stand-alone building and large surface parking (APN 4170011012, LTI ratio 0.002, built 1958).	10
9	4170023007	N/A	828 Manhattan Beach Blvd	CL	I	0.17	Stand-alone dermatology office with surface parking lot (LTI ratio 0.42, built 1971).	7
10	4163009020	N/A	1633 Artesia Blvd	RH	I	0.30	Single-family residence with one exiting residential unit (LTI ratio 0.15, built 1950).	9
11	4170025010 4170025008 4170025009	F	916–920 Manhattan Beach Blvd.	CL	I	0.36	Single-family residence (APN 4170025010, one existing unit, LTI ratio 0.12, built 1941); two-story insurance agent office with surface parking (APN 4170025008, LTI ratio 0.92, built 1978); triplex (APN 4170025009, three existing residential units, LTI ratio 0.24, built 1949).	9
12	4179004001	N/A	1212 Highland Ave	CD	III	0.15	Stand-alone two-story building with a chiropractor office, real estate agent office, and surface parking lot (LTI ratio 0.35, built 1946).	6
13	4179020012 4179020001 4179020013	G	Manhattan Ave/Manhattan Beach Blvd.	CD	III	0.11	Stand-alone clothing retail store (APN 4179020012, LTI ratio 0.27, built 1947); ice cream shop (APN 4179020001, LTI ratio 0.40, built 1940); stand-alone gift shop (APN 4179020013, LTI ratio 0.09, built 1923).	4
14	4179028001	N/A	1419 Highland Avenue	CD	III	0.08	Irregular-shaped stand-alone building with a real estate agency office and abutting angled surface parking (LTI ratio 0.31, built 1956).	3
15	4175024023	N/A	3515 Highland Avenue	CNE-D5/RH	III	0.093	Stand-alone hair salon with a small surface parking lot (LTI ratio 0.98, built 1965).	3
16	4137009058	N/A	4005 Highland Avenue	CNE	IV	0.13	Stand-alone vacated gym with small surface parking (LTI ratio 0.79, built 1970).	5



**Table 8. Moderate-Income Sites Identified**

Table ID	APNs	Consolidated Site Letter	Address	Zone	Area District	Acres	Existing Uses	Net New Units
17	4170009800	N/A	953 Manhattan Beach Blvd.	CL	II	0.59	Telecommunications office building with large surface parking lot (built 1960).	20
18	4166009008	N/A	1426 12th Street	RH	II	0.24	Duplex (two existing units, LTI ratio 0.31, built 1942).	6
19	4166010006	N/A	1324 12th St.	RH	II	0.16	Single-family residence (one existing unit, LTI ratio 0.27, built 1953).	4
20	4166010008	N/A	1314 12th St	RH	II	0.16	Single-family residence (one existing, LTI ratio 0.32, built 1956).	4
21	4170024008 4170024009	H	852 Manhattan Beach Blvd 848 Manhattan Beach Blvd	CL	I	0.19	Mixed-use lot with two stand-alone buildings: the building abutting Manhattan Beach Blvd. is a tax preparation office, the second building has one existing residential unit (APN 4170024008, LTI ratio 0.24, built 1952); stand-alone vacated office building (APN 4170024009, LTI ratio 0.41, built 1940).	5
22	4170014008 4170014009	I	1441–1445 Poinsettia Ave	CL	II	0.16	Single-family residence, detached unit (APN 4170014008, LTI ratio 0.30, built 1928); single-family residence, detached (APN 4170014009, LTI ratio 0.03, built 1940).	3
23	4166008016	N/A	1451 12th St	RH	II	0.17	Duplex (two existing residential, LTI ratio 0.60, built 1954).	4
24	4170008027 4170008028	J	1011–1019 Manhattan Beach Blvd.	CL	II	0.39	Design studio (APN 4170008027, LTI ratio 0.14, built 1963); stand-alone restaurant with large surface parking lot (APN 4170008028, LTI ratio 0.44, built 1952).	13
25	4175017007 4175017009	K	3514 Highland Ave 3520 Highland Ave	CNE-D5	III	0.08	Stand-alone two-story insurance agency office with surface parking (APN 4175017007, LTI ratio 0.81, built 1965); commercial building with a spa (APN 4175017009, LTI ratio 0.88, built 1936).	3
26	4175016027 4175016015 4175016022	L	Highland/ Rosecrans	CNE	III	0.24	El Porto Building, closed sushi restaurant, barbershop, yoga studio, escrow office, and pub, seven existing residential units, building for sale (APN 4175016027, LTI ratio 0.29, built 1953); real estate and escrow office (APN 4175016015, LTI ratio 0.48, built 1948); restaurant and pub (APN 4175016022, LTI ratio 0.31, built 1949).	6
27	4163008038	N/A	1711 Artesia Blvd.	CL	I	0.31	Graphic design office, permanently closed beauty salon that is vacated, surface parking lot (LTI ratio 0.39, built 1959).	10
Total	—	—	—	—	—	5.11	—	158

APN = Assessor's Parcel Number; LTI = land-to-improvement; N/A = not applicable

### 4.3 Above Moderate-Income Sites

Sites with luxury units or above moderate-income units as planned for the residential development in the pipeline were identified as having the capacity to accommodate the majority of the above moderate-income sites; see Section 5, Planned, Approved, and Prospective Projects, for full details. While most of the units are accounted for through pipeline development expected to be completed during the planning period, the sites identified to accommodate the remaining above moderate-income RHNA are listed in **Table 9, Above Moderate-Income Sites Identified**. Per HCD criteria, none of the sites identified for above moderate-income are considered vacant, therefore the City relied on non-vacant underutilized sites. The underutilized sites were selected based on the methodology described in Section 3.1. The Sites Analysis identified existing capacity for 11 sites, a total of 19 units for the above moderate-income RHNA. Specifically, identified in the RM, RH, and commercially zoned districts permitting multifamily and mixed uses (CD and CNE). The existing uses on the sites identified include office spaces, restaurants, and single-family residences located in older buildings that appear in need of repairs, as well as dilapidated parking lots and empty parcels. None of the sites are identified require lot consolidation. Through **Program 20, Objective Design Standards**, the City will increase transparency and certainty in the development process through objective design standards.

Table 9. Above Moderate-Income Sites Identified							
Table ID	APN	Address	Zone	Area District	Acres	Uses	Net New Units
28	4179004005	315 12th St	CD	III	0.06	Surface parking lot (LTI ratio 0.01)	2
29	4179022029	1213 Manhattan Avenue	CD	III	0.03	Stand-alone dentistry office (LTI ratio 0.51, built 1924)	1
30	4179028025	1409 Highland Avenue	CD	III	0.074	Stand-alone real estate office (LTI ratio 0.27, built 1989)	3
31	4137010006	3917 Highland Avenue	CNE	IV	0.04	Surface parking lot (LTI ratio 0.02)	1
32	4137008057	41st/Highland	CNE	IV	0.06	Surface parking lot (LTI ratio 0.006)	2
33	4175016005	316 Rosecrans Ave	CNE	III	0.06	Stand-alone restaurant (LTI ratio 0.08, built 1939)	2
34	4137002016	Rosecrans/Vista	CNE	IV	0.04	Empty parking lot (LTI ratio N/A)	1
35	4137010022	Porto/Ocean	RH	IV	0.03	Empty parking lot (LTI ratio N/A)	1
36	4179014013	815 Manhattan Ave	CD	III	0.06	Office building, clothing store, and furniture store (LTI ratio 0.26, built 1972)	2
37	4166008007	1407 12th St	RH	II	0.12	Single-family residence, one existing unit (LTI ratio 0.08, Built 1956)	3
38	4166008002	1416 15th St	RM	II	0.17	SFR, 1 existing unit (LTI ratio 0.42, Built 1954)	1
Total	-	-	-		0.74	-	19

## 5 Planned, Approved, and Prospective Projects

Two development projects in the pipeline are seeking entitlements or have prospective development expected to be built within the planning period. One of the pipeline projects is a multifamily residential project, and the other is a mixed-use project, both of which will be redevelopment projects on non-vacant parcels. There are a number of other projects in the City with residential units, such as single-unit developments, that have not been included in this Sites Inventory but are expected to be completed during the planning period.

In addition to the pipeline projects, ADUs projected to be constructed during the planning period may be credited toward capacity to accommodate the RHNA. The following sections provide a description of pipeline projects and ADU projections for the planning period.

### 5.1 Verandas – 401 Rosecrans Avenue

Verandas is located at 401 Rosecrans Avenue and 3770 Highland Avenue on two abutting parcels with common ownership, a total acreage of 1.02 acres, and a density achieved of approximately 79 units per acre. Although the base zone, CNE in Area District III, allows for a maximum density of 51.2 dwelling units per acre, the project was able to achieve a density 152 percent over the maximum permitted. The project is using a density bonus permitted under State law, in addition to a 10 percent bonus through the City's lot consolidation incentive (Program 16). As such, the project consists of 73 above moderate-income multifamily residential units and 6 very low-income units. The project is a redevelopment site replacing an event venue previously known as Verandas Beach House located in the northwest area of the City along Highland Avenue and Rosecrans Avenue. As previously mentioned, the site is located in the CNE zone which allows commercial uses, mixed-use, and multifamily residential uses. This area of the City includes a mix of retail, office, and residential uses along Highland Avenue, and primarily residential uses along Rosecrans Avenue. However, the site is being developed as fully residential without a commercial component.

### 5.2 1701–1707 Artesia

The 1701–1707 Artesia Project is mixed-use project in the CL zone, Area District I, consisting of 649 square feet of commercial space and 14 residential units, including 1 very low-income unit. This project will redevelop the site on two parcels, under separate ownership, replacing a closed antique shop and a detached single-family residence located along the southern border of the City along Artesia Boulevard, at the northeast corner of south Redondo Avenue and Artesia Boulevard. The consolidated site is approximately 0.3 acres and developed at a density of approximately 46.6 units per acre. While the base zone permits a maximum of 43.6 per acre, the project achieved a 117 percent of the maximum permitted density by utilizing a density bonus as allowed under State law.

### 5.3 Summary of Residential Projects in Pipeline

In total, 93 units are part of planned, approved, or prospective projects expected to be built within the planning period that are counted toward meeting the 6th Cycle RHNA. Based on affordability restrictions, the projects are anticipated to provide a total of seven very low-income units (included under lower-income units in **Table 10**), and 86 above moderate-income units. The projects summarized above are listed in **Table 10, Pipeline Residential Development Credited Toward 6th Cycle RHNA**.

<b>Table 10. Pipeline Residential Development Credited Toward 6th Cycle RHNA</b>				
Project	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units Credited Toward 6th Cycle RHNA
Verandas – 401 Rosecrans Ave.	6	—	73	79
1701–1707 Artesia Blvd.	1	—	13	14
Totals	7	—	86	93

Source: City of Manhattan Beach  
RHNA = Regional Housing Needs Allocation

## 5.4 Accessory Dwelling Unit Projection

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of ADUs and junior accessory dwelling units (JADUs) to be developed within the RHNA projection period. The number of ADUs and JADUs that can be credited toward potential development must be based on the following factors:

- ADU and JADU development trends since January 2018
- Community need and demand for ADUs and JADUs
- Resources and incentives available to encourage their development
- The availability of ADUs and JADUs for occupancy
- The anticipated affordability of ADUs and JADUs

Recent changes to legislation governing the development and provision of ADUs and JADUs have sparked growth in these units in cities across California, including Manhattan Beach. The City is entirely built out and urbanized, and ADU and JADU production is an ideal strategy for producing needed housing while capitalizing on existing infrastructure, such as water and sewer. Additionally, this is often a strategy that is more easily accepted by stakeholders who may be resistant to change because these units provide a form of “unseen” density that is palatable to many.

Although from 2017 to 2019 only three ADUs were permitted and constructed in the City, from January 2020 to date (October 2021), the City has issued eight permits. **Table 11, Accessory Dwelling Unit and Junior Accessory Dwelling Unit Development Trends**, details recent ADU and JADU development in the City.

<b>Table 11. Accessory Dwelling Unit and Junior Accessory Dwelling Unit Development Trends</b>	
Year	Permitted Units
2017–2019	3
2020	3
2021 to date (October 2021)	8

Source: HCD Housing Element Implementation and APR Data Dashboard, 2021

Because ADU and JADU legislation has been revised several times since 2017, providing increased opportunities for the development of housing, it is expected that development trends will continue in an upward trajectory. An Interim ADU Ordinance was in place through 2020 in accordance with updated State laws, and in January 2021, the City Council adopted the City’s local ADU and JADU Ordinance that is currently in place. The City’s ADU Ordinance, adopted in January 2021, contains provisions that go beyond those set forth in State law, as follows:

- Consistent with State law, the City permits one ADU and one JADU per lot. Alternatively, to offer more flexibility, the City permits two ADUs on a lot with a proposed or existing single-family dwelling.
- The City permits ADUs for existing multifamily dwelling units, consistent with State law. In addition, the City permits one ADU on a lot with a newly constructed multifamily development.

As of October 2021, eight ADUs have been permitted in 2021 and 22 ADU permit applications are in review. To account for this increased potential, this Sites Analysis used the upward trends and sharp increase in ADU construction since January 2018 to estimate new production; however, this only accounts for the effect of new laws without local incentives, such as the public engagement and informational tools to streamline the approval process and market ADU construction that will be implemented as part of **Program 1, Accessory Dwelling Units**, of the City’s Housing Element, and the recent ADU Ordinance adopted in January 2021. Based on the local incentives, ADU and JADU trends since January 2018, recent upward trends in 2021, and permits currently under City review, a conservative estimate of the number of units to be produced under this approach is 10 units each year during the 6th Cycle RHNA projection period (June 30, 2021 – October 15, 2029), for a total of 83 units.

In addition to calculating the expected number of ADUs and JADUs to be developed within the projection period, the Sites Inventory must calculate the anticipated affordability of ADUs and JADUs to determine which RHNA income categories they should be counted toward. To facilitate the ADU affordability assumptions for jurisdictions, SCAG conducted the Regional Accessory Dwelling Unit Affordability Analysis.<sup>2</sup> As part of the analysis, SCAG conducted a survey of rents of 150 existing ADUs from April through June 2020. Efforts were made to reflect the geographic distribution, size, and other characteristics of ADUs across counties and subregions. For example, Los Angeles County is separated into two categories, Los Angeles County I and Los Angeles County II, to better account for the disparities in housing costs between coastal and inland jurisdictions.

SCAG concluded that 23.5 percent of ADUs were affordable to very low-income households. Based on these assumptions, of the total 83 ADUs that are projected to be built during the planning period, 14 are estimated to be affordable to very low-income households, 36 to low-income households, 5 to moderate-income households, and 28 to above moderate-income households. **Table 12, Estimated Affordability of Projected ADUs 2021–2029**, shows the assumptions for ADU affordability based on the SCAG survey for Los Angeles County II.<sup>3</sup>

In coordination with the updated policies and programs in the Housing Element and the City’s ongoing efforts to promote the development of ADUs and JADUs, it is likely that these units will be produced at a much higher rate. The programs of the Housing Element aggressively promote and incentivize the production of ADUs and JADUs.

Table 12. Estimated Affordability of Projected ADUs 2021–2029		
Income Level	Percent of ADUs	Projected Number of ADUs
Very Low-Income	17%	14
Low-Income	43%	36
Moderate-Income	6%	5
Above Moderate-Income	34%	28

<sup>2</sup> [https://scag.ca.gov/sites/main/files/file-attachments/adu\\_affordability\\_analysis\\_120120v2.pdf?1606868527](https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527)

<sup>3</sup> The survey separated Los Angeles County into two categories. Los Angeles County I includes the City of Los Angeles, Las Virgenes-Malibu, South Bay cities, and Westside cities, and Los Angeles County II includes all other Los Angeles County jurisdictions. The affordability assumptions for Los Angeles County II are reflected in this Sites Inventory.

Table 12. Estimated Affordability of Projected ADUs 2021–2029		
Income Level	Percent of ADUs	Projected Number of ADUs
Total	100%	83

Source: SCAG Regional Accessory Dwelling Unit Affordability Analysis, 2020  
ADU = accessory dwelling unit

## 6 Summary of Capacity to Accommodate the RHNA

The City of Manhattan Beach is an urbanized community in the South Bay area of Los Angeles County. Due to the built-out nature of the City, small parcel sizes, and high-density build out in parcels adequately zoned for lower-income units, the availability of adequate sites is limited. The City identified capacity for housing through underutilized sites that meet zoning density requirements, have older structures, and have an assessed LTI ratio of less than 1. The underutilization of these sites paired with the programs of the Housing Element such as programs 1, 7, 11, 16, and 20 will ensure that the City can realistically meet the RHNA targets at all income levels for the 6th Cycle, and provide additional sites for a buffer, ensuring that capacity remains throughout the Housing Element planning period.

**Table 13, Summary of Residential Capacity and Credit Toward RHNA**, shows the breakdown of all existing capacity, projected ADUs, and credits to be counted toward the RHNA, and compares these numbers to the City’s assigned 6th Cycle RHNA. The “total capacity (net new units)” identified in this table does not reflect the additional capacity that would be captured through an overlay or rezone. The capacity deficit by income category, as detailed below, will be accommodated through an Adequate Sites Program.

As shown in Table 13, the City has a total capacity for 81 lower-income units, 163 moderate-income units, and 133 above-moderate income units within the residential pipeline of projects, underutilized sites, and through the expected number of ADUs and JADUs. The lower-income RHNA is not met through this current capacity, as there is a shortfall of 406 units; however, the City will accommodate the shortfall through **Program 2, Adequate Sites**, of the Housing Element. Through implementation of Program 2, the City will establish an overlay district that encompasses a minimum of 20.3 acres of sites in the General Commercial (CG) and Planned Development (PD) Districts to accommodate the remaining lower-income RHNA. The overlay district will create the opportunity for at least 406 units of housing appropriate to accommodate lower-income households. Separately from Program 2, the City will rezone and select sites from the overlay district to create an opportunity for an additional 3.65 acres of sites to accommodate a buffer of at least 15 percent (approximately 73 units), as recommended by HCD, to ensure sufficient capacity exists to accommodate the RHNA throughout the planning period and to comply with the provisions of Senate Bill 166 (2017).

**Table 14, Additional Site Capacity**, identifies the number of units in terms of acreage for the shortfall of lower-income units that will be accommodated through Program 2, and the number of units in terms of acreage that will provide a buffer of at least 15 percent for lower-income sites, as recommended by HCD, through rezoning and the overlay district. The acreage needed is assumed using a realistic capacity of 20 dwelling units per acre, based on the minimum density requirements of the Adequate Sites Program.

**Table 13. Summary of Residential Capacity Compared to 6th Cycle RHNA by Income, City of Manhattan Beach, June 30, 2021 through October 31, 2029**

Category	Total Units	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units
RHNA	774	487	155	132
Underutilized Site Capacity (Net New Units)	201	24	158	19
Vacant Site Capacity	0	0	0	0
Pipeline Residential Development Credited Toward RHNA	93	7	0	86
Projected Accessory Dwelling Units	83	50	5	28
<b>Total Capacity (Net New Units)</b>	<b>377</b>	<b>81</b>	<b>163</b>	<b>133</b>
<b>Total Capacity Deficit (-) OR Surplus (+)</b>	<b>—</b>	<b>-406</b>	<b>+8</b>	<b>+1</b>
Additional Capacity to Accommodate Shortfall Through Adequate Sites Program Overlay	406	406	—	—
Additional Capacity for Buffer Through Rezoning and Overlay	73	73	—	—

RHNA = Regional Housing Needs Allocation

**Table 14. Additional Site Capacity**

	Units	Acreage
Adequate Sites Program Overlay to Address Lower-Income Shortfall	406	20.3
Rezone and Overlay to Address Lower-Income Buffer	73	3.65
Total	479	23.95

**Figure 1, Northwest Sites Identified**, shows the Veranda planned project, identified on the legend as Pipeline Development Sites, and sites identified for all income levels. area is locally known as El Porto, near Rosecrans Avenue and Highland Avenue. As previously discussed in Section 5.1, the Verandas project includes two parcels consolidated as one site which is shown on the map. **Figure 2, Western Sites Identified**, shows sites selected near Manhattan Beach Boulevard and Highland Avenue, as well as areas west off Sepulveda Boulevard. **Figure 3, Central and Southeast Sites Identified**, shows the 1701–1707 Artesia Project, which as previously discussed in Section 5.2, includes two consolidated parcels, and other identified sites along Artesia Boulevard and other southern sites, as well sites along Manhattan Beach Boulevard, generally east of Sepulveda Boulevard.



Northwest City Area  
6th Cycle - Sites Identified



Figure 1. Northwest Sites Identified

Western City Area  
6th Cycle - Sites Identified



Figure 2. Western Sites Identified

Central and Southeast City Areas  
6th Cycle - Sites Identified



Figure 3. Central and Southeast Sites Identified

## 7 Sites Identified for Adequate Sites Program

After calculating the City's current capacity on underutilized sites, pipeline projects to be credited toward the RHNA, and projections for ADUs, the City has a deficit or shortfall of 406 units for the lower-income RHNA category. To accommodate the remaining lower-income RHNA, the City identified potential sites in the General Commercial (CG) and Planned Development (PD) zoning districts to be made available to accommodate residential uses appropriate for lower-income households within 3 years and 120 days from the beginning of the planning period. Through implementation of Program 2 of the Housing Element, the City will establish an overlay that encompasses a minimum of 20.3 acres of these sites (see Program 2 for additional details) to accommodate the shortfall of lower-income units. In addition, the City will also rezone and identify sites within the overlay (approximately 3.65 acres total) to accommodate a buffer of at least 15 percent (approximately 73 lower-income units), as recommended by HCD, to ensure sufficient capacity exists to accommodate the RHNA throughout the planning period (see **Program 19, No Net Loss**, of the Housing Element), which is discussed in **Section 7.2, Sites to Accommodate Lower-Income Buffer**. As detailed in Section 7.2, the City was able to identify 5 sites for a total of 26 lower-income buffer units. The remaining need for 47 sites, 2.35 acres, will be identified from the sites identified in **Table 15, Potential Underutilized Sites for Overlay**, below (see Section 7.2 for details).

### 7.1 Sites to Accommodate Lower-Income Shortfall

To accommodate the remaining lower-income RHNA and a portion of the lower-income buffer sites, the City will establish an overlay to permit residential uses at a minimum of 20 dwelling units per acre as required per State law (see Program 2 in the Housing Element for program components and requirements). As detailed in Section 4, Existing Capacity, there are various limitations and challenges identifying sites adequate for lower-income RHNA units that meet HCD criteria, including size of sites, as well as unavailability of vacant sites, and availability of residential sites which yield positive net new units. Further, due to an existing voter initiative, development regulations in the RS, RM, and RH residential zoning districts cannot be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit, unless the amendment is first submitted to a Citywide election and approved by a majority of the voters. As such, the City is limited to identifying rezoning opportunities for the overlay in the CG and PD zones.

**Table 15, Potential Underutilized Sites for Overlay**, (identifies qualifying sites within the CG and PD zones that may be included within the overlay to address the lower-income shortfall and portion of the lower-income buffer sites. The following section provides a description of the methodology utilized to identify sites to accommodate the lower-income shortfall and buffer sites.

#### 7.1.1 Non-vacant Sites Selection Methodology

As described in Section 3, there are no vacant sites in the City, therefore, the overlay relies on non-vacant sites. Similar to the underutilized methodology for selecting underutilized sites in Section 3.1, the City reviewed specific factors for identifying and prioritizing underutilized sites for the overlay including:

- **Undervalued** – An assessed land-to-improvement (LTI) ratio less than 1. Improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the

assessed value of the land is greater than the assessed improvement. However, sites with an LTI greater than 1 are also identified in the overlay for sites where there is developer interest, and as it is assumed that the overlay would increase the value of the land as these sites have not previously allowed for residential development.

- **Under Built** – Commercially zoned sites where the current floor area ratio compared to the maximum allowable floor area ratio is less than 100 percent. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt.
- **Building Age** – Buildings more than 30 years old. Building age is also a major factor influencing property valuation and land value. In general, a building that is 30 years or older is considered older as it may begin to need costly repairs.
- **Resource Access** – Within TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households.
- **Size of Sites.** – Sites that meet or could be consolidated to the acreage criteria of 0.5 per HCD’s recommendation for lower-income unit development.

These initial factors were used to narrow the selection of sites within the City to allow for a more informed approach to selecting sites. Following the selection of sites through the above-mentioned data-driven approach, sites were then further narrowed down through on-the-ground research that looked at the potential to consolidate sites, the feasibility of the redevelopment of the existing use, and any known developer interest that has been revealed through developer discussions with City staff. This included the use of online mapping tools, including Google Earth and Google maps, as well as City knowledge of the current projects in the pipeline and development interest in certain areas of the City. These methods were used to verify building vacancies and the underutilized status of existing uses. The methodology was developed to align with current trends in the City. Table 15 provides the context of each site, including the acreage, potential units, and a description of existing uses, and notes if the site has developer interest or property owner interest to sell. The City is experiencing increased development interest in the areas identified for future development, and multiple inquiries regarding potential housing projects are received on a monthly basis. Through the process of updating the Housing Element, there have been workshops and outreach to developers and property owners (see **Appendix F, Community Engagement Summary** for details on outreach).

### 7.1.2 Existing Uses

An on-the-ground analysis of identified rezone sites indicate that the existing uses will not impede residential development. There are no known existing leases or deed restrictions that would perpetuate the existing use or prevent redevelopment on sites identified on Table 15 and Table 16. As part of the analysis, the City confirmed vacated uses, and underutilized sites by conducting site level analysis of the conditions of the buildings, structures, and general property area which indicate dilapidation and/or poor maintenance. While there is one site identified in Table 15, which is considered a brownfield site, through Program 12, the City is committing to working with the development community to identify ways that lower-income housing can be provided and connecting developers to funding sources available for this such sites such as the State Brownfield Funding (see Program 12 in the Housing Element). The majority of the sites are selected from the CG zone which does not currently allow for

commercial uses. Therefore, in selecting sites, residential components were not a factor impacting the potential for residential development on the sites. In the PD zone, sites are largely underutilized as the parcels are larger ranging from 4 to 7 acres and contain commercial or office building with large, underutilized parking lots. Many of the sites selected include structures that are older with some vacated uses or marginalized uses that can be expected to discontinue within the planning period and are therefore good candidate for redevelopment. In conversation with property owners, the City has documented an increasing interest to sale commercial corner lots and commercial strips along Sepulveda Boulevard. As previously mentioned, the City has no vacant land, therefore, development will occur on infill sites.

### 7.1.3 Development Trends

The City has conducted an analysis of development trends to inform the selection of sites that will form the rezone overlay. According to development trends since 2018, the City has permitted 14 residential building permits for single-family and multifamily housing ranging from 1 to 4 units (see Table 3). These developments are located on zones that permit residential development. As such the City analyzed development trends in the City of El Segundo, Hermosa Beach, and Redondo Beach, as they are coastal cities and have similar land use characteristics as the City. The analysis revealed similar residential development trends of single-family homes, 2-unit condominiums, and few developments of 3 units or more. In the study, it was found that all cities are seeing a recent increase in developer interest for larger multifamily housing developments and mixed-use development particularly, in the City of El Segundo and Redondo Beach. Specific to the City, as noted in Table 3 and detailed in Section 5, there are two planned multifamily residential development projects, a 79-unit residential project and a 14-unit mixed use project, both of which are located along corridors with both residential and commercial uses and are zoned as commercial. Mixed-use developments in the City of Redondo Beach and El Segundo are also located along commercial corridors. These planned development trends reveal a recent increase in development of residential housing in coastal cities. Specifically, along commercial corridors as they have larger parcels than parcels zoned for residential development.

Some of the sites identified as part of the rezone overlay and buffer to ensure capacity through the planning period include identification of various parcels to create one site. The City identified multiple contiguous parcels when reasonably expected to be consolidated into one site. For example, the parcels had similar characteristics, the parcels were part of a larger are (i.e., same shopping center). Sites that include multiple parcels have also been selected as such to ensure compliance with HCD site size criteria. As previously discussed, both planned development projects in the City include lot consolidation; and while the Verandas project consolidated parcels under the same ownership, 1701 – 1707 Artesia Project was able to consolidate parcels under separate ownership. Examples of consolidation sites in the City have typically included two parcels, and sites selected for the rezone overlay also identify sites with 3 or more parcels. Therefore, the City also analyzed project trends in surrounding cities to support the selection of sites and found a redevelopment project in the City of Redondo Beach similar in nature with the characteristics of consolidated sites selected for the rezone overlay. The project includes consolidation of 6 parcels to form a 1.26-acre site for proposed mixed-use residential and commercial use. These examples support the consolidation of sites regardless of ownership.

Since development trends for affordable housing in the City are limited, the City's looks to its ADU trends to forecast what can be expected with housing development during the planning period. For example, the City saw very little ADU applications since 2017, received 3 from 2017-2019, 3 in 2020, and saw a sharp increase in 2021. This is directly related to legislative changes which encourage and facilitate the development of ADUs. As such, the City expects to see an increase in more intensive infill housing development as a result of new State legislation and through the implementation of programs included in the Housing Element which facilitate the production of affordable housing. Through Program 19, the City is committing to developing a methodology to track and monitor all development activity to inform remaining capacity need to meet the City's RHNA.

#### 7.1.4 Market Conditions

Housing market conditions are also an important factor in determining the feasibility of residential development on non-vacant sites. The City conducted a market study to inform the feasibility of sites selected to be included as part of the rezone overlay. The study found that there is a limited amount of available land on the market zoned for residential and mixed-use developments. According to Realtor.com the median home value in Manhattan Beach is \$3.1 million which is similar to what other real estate websites such as MB Confidential, Redfin, Zillow, and LoopNet are reporting. Current properties on the market zoned for multifamily development in the City and surrounding cities including Redondo Beach, Hermosa Beach, and El Segundo, revealed that the median parcel size for multifamily development lots is 0.06 acres. Lot acreages ranged from 0.03 acres to 0.17 acres. A notable multifamily development on the market located in El Segundo, included a 31-unit development on a 0.13-acre lot. Small parcel sizes may be contributing to the lack of larger multifamily developments built in the City and surrounding cities as discussed in the previous section.

Another market condition analyzed is the cost of construction. Construction costs depend on the type of construction for example the national average for Type I or II multifamily is \$148.82 to \$168.94 per square foot and Type V Wood Frame multifamily is \$113.88 to \$118.57 per square foot and consider hard cost for materials and land value, and soft costs which includes permitting fees (see Appendix C, Constraint and Zoning Analysis for details). Further, a study of the costs of affordable housing production in California revealed that between 2016 and 2019, the costs to develop a new affordable unit under the Low-Income Housing Tax Credit (LIHTC) program increased from \$425,000 per unit to more than \$480,000 per unit. Coastal cities in California have among the highest land value and building costs in the country which likely exceed the aforementioned national average per square-foot and LIHTC affordable per unit calculations. Therefore, local market conditions related to high land value and construction costs coupled with the limited supply of available and developable land in the City indicate that non-vacant sites selected for the rezone overlay are prime for more intensive, compact, and infill development, including redevelopment and reuse of sites. A main component of securing financing from a lender is directly related to the demand of such development. And as this analysis shows, there is a large demand for housing in the City and along coastal communities. The sites selected for the rezone are financially feasible as the parcels are much larger than what is currently available in the City. A study of the land zoned for CG indicates the median parcel size is 0.21, which is much larger when compared to the median parcel size for zones that allow for multifamily development which is 0.06. As such, the sites selected for the rezone overlay will draw developer interest as there is currently a lack of viable available land in the City. Sites selected for the rezone are selected along commercial corridors since rezone opportunities are limited to CG and PD zones. As previously mentioned, there is an increasing

demand along commercial corridors as they have larger parcels than parcels zoned for residential development. Therefore, in addition to selecting sites where market conditions show the direction of redevelopment opportunities, the sites also comply with the California Tax Credit Allocation Committee (TCAC) opportunity mapping methodologies by identifying capacity for affordable housing near resources such as transit, jobs, grocery stores, and other community resources. Since the primary function of the California TCAC is to oversee the LIHTC program, which provides funding to developers of affordable rental housing, many affordable housing development is often also located near commercial corridors as these areas typically have the highest access to resources.

#### 7.1.5 Availability of Regulatory and/or other Incentives

The City is supporting the development of housing on sites selected to accommodate the RHNA shortfall through various regulatory and financial incentives. Through Program 2, the City will adopt standards for the overlay district to address the RHNA shortfall and will include the following components, sites must allow a minimum of 16 units per site, permit a minimum of 20 dwelling units per acre, allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project, permit owner-occupied and rental multifamily uses by right pursuant to Government Code Section 65583.2(i) for developments in which 20 percent or more of the units are affordable to lower-income households. Again, the realistic capacity is based on the minimum dwelling units per acre outlined by State law; however, this does not preclude developers to build at the maximum capacity which will be developed during the planning process (see Program 2 in the Housing Element for more details).

In addition to developing the overlay district standards, through Program 11, the City is committing to updating the Density Bonus Ordinance to ensure is consistent with future amendment to State law. The City supports the density bonus incentives permitted under State law and to further incentivize affordable units, multifamily projects in residential districts that qualify for a density bonus are eligible for a streamlined approval process through **Program 3, Affordable Housing Streamlining** and **Program 18, Multifamily Residential Development Standards and Streaming in the Mixed-Use Commercial Districts** (see Housing Element programs for details). Through Program 12, the City will actively work with the development community to identify ways that lower-income housing may be provided, including housing for extremely low-income households and those with special housing needs. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households.

To support sites identified as consolidated sites with multiple parcels, the City provides an additional density bonus incentive under Section 10.12.030 of the MBMC above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus. The additional density incentive is granted in exchange for lot consolidation, see Program 16 for details. Through **Program 24, Priority Services**, the City is committing to coordinate with Public Works to ensure that proposed developments that include housing affordable to lower-income households, including extremely low- and very low-income households, are prioritized for the provision of water and sewer services. Internal coordination will further support the prioritization of water and sewer services for future residential development, including units affordable to lower-income households. Through programs in the housing element and identification of adequate sites for the overlay district, the City is ensuring there is capacity to accommodate the lower-income shortfall.



**Table 15. Potential Underutilized Sites for Overlay**

Table ID	APNs	Consolidated Site Letter	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
1	4169006006 4169006005 4169006007	A	CG	I	0.55	10	Two-story office building for MB real estate agency with a surface parking lot to the rear (APN 4169006006, LTI ratio 0.37; built 1977). Small commercial strip with three stand-alone buildings including a Pilates studio, hair salon, photography studio. State Farm real estate agent office, law office, tanning studio (APN 4169006005, LTI ratio 0.14, built 1954; APN 4169006007, LTI ratio 0.66, built 1987).
2	4173027026 4173027022 4173027021 4173027020 4173027019 4173027024 4173027027	B	CG	II	1.18	23	Five one-story standalone buildings. A smog check shop (APN 4173027026, LTI ratio 1.05, built 1989). Picture frame shop (APN 4173027022, LTI ratio 0.0003, built 1947) with parking lot (APN 4173027021). Medical offices, including a dermatology, hearing, facial plastic and ENT surgery (APN 4173027019, LTI ratio 3.08, built 1969) and parking lot (APN 4173027020). Standalone building and surface parking lot with an animal hospital, vacated massage spa, and a postal center (APN, 4173027027, LTI ratio 0.21, built 1974). Standalone building and surface parking lot with a secondhand store (APN 4173027024, LTI ratio 0.41, built 1948).
3	4171013041 4171013036 4171013030 4171013034 4171013029 4171013039 4171013041	C	CG	II	1.48	29	One-story building, same-day COVID-19 testing clinic and vacated spa (APN 4171013036, LTI ratio 0.99, built 1954). Nail salon, coreolgy pilates studio, sports bar, and dermatology and laser center (APN 4171013041, LTI ratio 0.5, built 1961). Printing Office (APN 4171013034, LTI ratio 0.22, built 1947). Real estate group office, and acting studio (APN, 4171013039, LTI ratio 0.54, built 1957). Vacated Enterprise Rent-A-Car (APN 4171013030, LTI ratio 0.34, built 1957) with a parking lot (APN 4171013029, LTI ratio 0.004).
4	4171014034 4171014035 4171014020 4171014021	D	CG	II	0.69	13	Auto repair and tire shop with surface parking (APN 4171014034, LTI ratio 0.66, built 1968). Auto service and repair shop with surface parking (APN 4171014035, LTI ratio 0.30, built 1972). Two-story building with an attorney office (APN 4171014020, LTI ratio 0.33, built 1923) and surface parking associated with attorney office (APN 4171014021, LTI ratio 0.003, built 1950).
5	4170006019 4170006018 4170006017 4170006022 4170006015 4170006028 4170006027 4170006013	E	CG	II	1.15	21	Stand-alone shipping and mailing store with surface parking (APN 4170006019, LTI ratio 0.26, built 1965). Stand-alone marketing agency (APN 4170006018, LTI ratio 0.06, built 1950). Duplex with two existing residential units (APN 4170006017, LTI ratio 0.22, built 1949). Two-story commercial building with a sports bar and office spaces with a large surface parking lot (APN 4170006022, LTI ratio 0.39, built 1964). Stand-alone commercial building with a tailor and insurance agency office with surface parking (APN 4170006015, LTI ratio 0.26, built 1955). Ingress and egress to surrounding uses (APN 4170006028, LTI ratio N/A). Auto service shop (APN 4170006027, LTI ratio and built N/A). Veterinarian office (APN 4170006013, LTI ratio 0.34, built 1948).
6	4170007021 4170007022	F	CG	II	0.50	9	Stand-alone mattress store with surface parking (APN 4170007021, LTI ratio 0.43, built 1947). Self-service car wash with surface parking (APN 4170007022, LTI ratio

**Table 15. Potential Underutilized Sites for Overlay**

Table ID	APNs	Consolidated Site Letter	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
	4170007017 4170007016						0.42, built 1965). Auto repair shop with surface parking (APN 4170007017, LTI ratio 0.19, built 1949). Hair salon and pet salon with surface parking (APN 4170007016, LTI ratio 0.38, built 1949).
7	4167015034		CG	I	0.65	13	Church building with large surface parking lot (LTI ratio 0.80, built 1966).
8	4170037001 4170037002	G	CG	I	0.50	9	Stand-alone commercial with an ice cream shop, spa, and restaurant (APN 4170037001, LTI ratio 0.40, built 1956). Surface parking (APN 4170037002, LTI ratio 0.014).
9	4167026012 4167026011	H	CG	I	0.51	10	Corner lot with a one-story paint store and large surface parking (APN 4167026012, LTI ratio 0.87, built 1955). Two-story office building with a hair salon, plant services office, advertising office, and limousine services office (APN 4167026011, LTI ratio 0.43, built 1968).
10	4169014048 4169014016	I	CG	I	0.62	12	Stand-alone garden center (APN 4169014048, LTI ratio 0.33, built 1974). Garden center store (APN 4169014016, LTI ratio 0.27, built 1954).
11	4167023013 4167023032	J	CG	I	0.66	13	Stand-alone cleaners with surface parking (APN 4167023013, LTI ratio 0.05, built 1941). Auto repair shop (APN 4167023032, LTI ratio 0.13, built 1964).
12	4168025011 4168025010 4168025009 4168025008	K	CG	I	0.68	13	Pet supply store (APN 4168025011, LTI ratio 0.46, built 1980). Auto repair shop (APN 4168025010, LTI ratio 0.20, built 1953). Large surface parking associated with auto repair shop (APN 4168025009, LTI ratio 0.04). Two-story commercial building with a fraternity office and closed yarn shop (APN 4168025008, LTI ratio 0.75, built 1952).
13	4164003027 4164003022 4164003030	L	CG	I	0.66	12	Small commercial strip with pizza shop, liquor store, and laundromat (APN 4164003027, LTI ratio 0.52, built 1984). Small commercial strip with a camera repair shop, tailor, and nail salon (APN 4164003022, LTI ratio 0.39, built 1972). Single-family residence (APN 4164003030, LTI ratio 0.49, built 1957).
14	4164002032 4164002001	M	CG	I	0.68	13	Cleaners, smoke shop, and sports bar (APN 4164002032, LTI ratio 0.19, built 1957). One-story commercial building with a banner store, edible arrangements shop, auto parts store, and tutoring service office (APN 4164002001, LTI ratio 0.24, built 1953).
15	4170027001 4170027003 4170027023	N	CG	I	0.50	9	Two-story stand-alone building with an insurance agency office and nail salon (APN 4170027001, LTI ratio 1.49, built 1948). Surface parking lot (APN 4170027003, LTI ratio 0.06). Stand-alone restaurant (APN 4170027023, LTI ratio 0.15, built 1992).
16	4167026014 4167026015 4167026016	O	CG	I	0.51	10	Surface parking lot (APN 4167026014, LTI ratio 0.002). One-story stand-alone commercial building with a dentistry and foot specialist office (APN 4167026015, LTI ratio 0.61, built 1944). Auto repair shop with surface parking (APN 4167026016, LTI ratio 0.13, built 1970).
17	4163008046	N/A	CG	I	0.86	17	Stand-alone office building for an insurance agency with large surface parking lot (LTI ratio 3.37, built 1969).

**Table 15. Potential Underutilized Sites for Overlay**

Table ID	APNs	Consolidated Site Letter	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
18	4165024033	N/A	CG	II	0.51	10	Corner lot gas station (LTI ratio 0.12, built 1990).
19	4166020030	N/A	CG-D8	II	0.68	13	Office and commercial building with large surface parking lot, including a sporting goods store, hair salon, and other office spaces (LTI ratio 0.19, built 1961).
20	4138018022	N/A	PD	II	5.14	102	Five story stand-alone office building with a large surface parking lot (LTI ratio 3.31, built 1982).
21	4166019026	N/A	CG-D8	II	0.67	13	Car wash service (LTI ratio 0.51, built 1972).
22	4173032034	N/A	CG	II	0.68	13	Commercial lot with two stand-alone buildings. One building has multiple tenants, including a pizza franchise, massage spa, sushi restaurant, bakery, and jewelry store. The second building is a vacated office space. There is a large surface parking lot (LTI ratio 0.57, built 1983).
23	4166020034	N/A	CG-D8	II	2.93	58	Commercial center with a bicycle store, bagel stop, restaurant, sports apparel store, market, bank, and theatre company and large surface parking lot (LTI ratio 0.62, built 1955).
24	4171013043	N/A	CG	II	0.71	14	Small commercial strip and surface parking lot with a bank, lighting store, fitness store, and nail shop (LTI ratio 1.57, built 1980).
25	4170037023	N/A	CG-D8	I	0.5	10	Commercial retail building with a dry cleaners, Pilates studio, salon, hair studio, florist, restaurant, and personal fitness training gym (LTI ratio 0.54, built 1969).
26	4167028036	N/A	CG-D8	I	0.86	17	Small commercial building with a café and two restaurants with a large surface parking lot (LTI ratio 0.42, built 1960).
27	4168013014	N/A	CG-D8	I	1.5	29	Commercial building with a dental office, pizza restaurant, insurance office, driving school, and a large surface parking lot (LTI ratio 0.57, built 1976).
28	4168012034	N/A	CG	I	0.83	16	Stand-alone commercial building with a large surface parking lot with an eating establishment, donation center, and sandwich shop. There is redevelopment interest on this site (LTI ratio 1.63, built 1961).
29	4168012029	N/A	CG	I	0.89	17	Stand-alone bank with surface parking. There is redevelopment interest on this site. (LTI ratio 0.71, built 1964).
30	4168012036	N/A	CG	I	2.67	53	Shopping center with redevelopment interest. Composed of three stand-alone buildings with multiple tenants and large surface parking lot. Tenants include a fitness center, cleaners, tanning salon, spa, print and ship center, nutrition store, fast-food restaurant, and vacant tenant spaces (LTI ratio 0.76, built 1960).
31	4138018045	N/A	PD	II	4.79	95	Stand-alone five-story commercial building with a gym, coworking offices, and a parking garage (LTI ratio 1.93, built 1982).
32	4138018908	N/A	PD	II	7.47	149	Country club with surface parking and multiple tennis courts (LTI ratio N/A, City owned).
33	4138026900	N/A	PD	II	5.4	108	Large surface parking lot and recreation field (LTI ratio N/A, City owned).

**Table 15. Potential Underutilized Sites for Overlay**

Table ID	APNs	Consolidated Site Letter	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
34	4138020056	N/A	CG-D8	II	3.29	65	Large, vacated stand-alone building with developer interest (LTI ratio 1.49, built 1978).
Total	-	-	-	-	50.9	1,018	

APN = Assessor's Parcel Number; du/acre = dwelling units per acre; LTI = land-to-improvement; N/A = not applicable

## 7.2 Sites to Accommodate Lower-Income Buffer

As previously mentioned, in addition to establishing an overlay in the CG and PD zones to accommodate the shortfall of 406 lower-income units, the City will rezone approximately 3.65 acres to ensure there is an adequate buffer. As recommended by HCD and to comply with the provisions of Senate Bill 166 (2017) (see **Program 19, No Net Loss**), the buffer is approximately 15 percent (approximately 73 units) of the total 487 lower-income RHNA. The buffer will ensure sufficient capacity exists to accommodate the RHNA throughout the planning period. **Table 16, Rezone Sites for Lower-Income Buffer**, lists sites identified as underutilized using the methodology and on-the-ground analysis described in the previous section (see **Section 7.1.1, Non-vacant Sites Selection Methodology** through **7.1.5, Availability of Regulatory and/or other Incentives** for details) for identifying potential capacity in the City. The City identified 5 sites, a total of 26 net new units, as it accounts for existing residential uses, in the RS and RM zones which will be rezoned to RH which meets the default density of 30 dwelling units per acre required for lower-income sites. The realistic capacity is for lower-income units is again calculated at 20 dwelling units per acre. Table ID 35 through 37 are consolidated sites and include multiple parcels. As noted in previous sections, the City is facilitating lot consolidation through Program 16. Additionally, although most sites may include parcels with different ownership, planned development projects indicate that this has not prevented or created an impediment to the development of housing, and housing affordable to lower-income households.

Sites identified as Table ID 38 and 39, below, are identified as having potential and property owner interest to accommodate lower-income housing in exchange for parking reductions pursuant to the provisions of Assembly Bill (AB) 1851. The units calculated on Table ID 38 and 39 account for the requirements under AB 1851 which only allow up to 50 percent of the number of religious-use parking spaces requested to be eliminated. For example, the church site represented as Table ID 40, is located on a 1.63-acre lot and has a 0.51-acre surface parking lot. As AB 1851 only permits up to 50 percent of parking removal, the units were calculated at 20 dwelling units per acre on 0.30 acres. Through **Program 22, Parking Reductions in Exchange for Housing at Religious Institutions**, the City will amend the Zoning Code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development. The remaining need for 47 lower-income buffer units or 2.35 acres of land will be identified from the list of sites in Table 15; however, these sites will not be subject to the program requirements under Program 2 as is required for the shortfall of sites. **Figure 4, Sites to Accommodate Lower-Income Shortfall and Buffer**, shows sites selected as additional capacity for the City to accommodate the remaining RHNA need for lower-income units, including a buffer to ensure sufficient capacity throughout the planning period.

**Table 16. Rezone Sites to Accommodate the Buffer**

Table ID	APNs	Consolidated Site Letter	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 dwelling units per acre)	Existing Uses
35	4166007018 4166007014 4166007013 4166007012	P	RM	II	0.61	5	Duplex (APN 4166007018, LTI ratio 0.25, built 1957), Single-family residence, detached (APN 4166007014, LTI ratio 0.03, built 1965), Duplex (APN 4166007013, LTI ratio 1.56, built 1973). Duplex (APN 4166007012, LTI ratio 0.71, built 1971), total 7 existing residential units.
36	4166007008 4166007009 4166007010	Q	RM	II	0.51	4	Duplex (APN 4166007008, LTI ratio 0.21, built 1955). Duplex (APN 4166007009, LTI ratio 1.3, built 1946). Duplex (APN 4166007010, LTI ratio 1.7, built 1959), total 6 existing residential.
37	4169024004 4169024005	R	RM	I	0.55	8	Single-family residence, detached (APN 4169024004, LTI ratio 0.25, built 1934); single-family residence, detached (APN 4169024005, LTI ratio 0.01, built 1937).
38	4171031021	N/A	RS	II	0.66	4*	Church with an approximate 0.44-acre surface parking lot (LTI ratio 0.53, built 1956).
39	4167013020	N/A	RS	I	1.63	5*	Church with an approximate 0.51-acre surface parking lot (LTI ratio 1.74, built in 1963),
Total		-	-	-	3.96	26	-

\*Note: Calculated at 50% of the parking lot acreage indicated in the Existing Uses column  
 APN = Assessor's Parcel Number; du/acre = dwelling units per acre; LTI = land-to-improvement; N/A = not applicable

### Sites to Accomodate Lower-Income Shortfall and Buffer

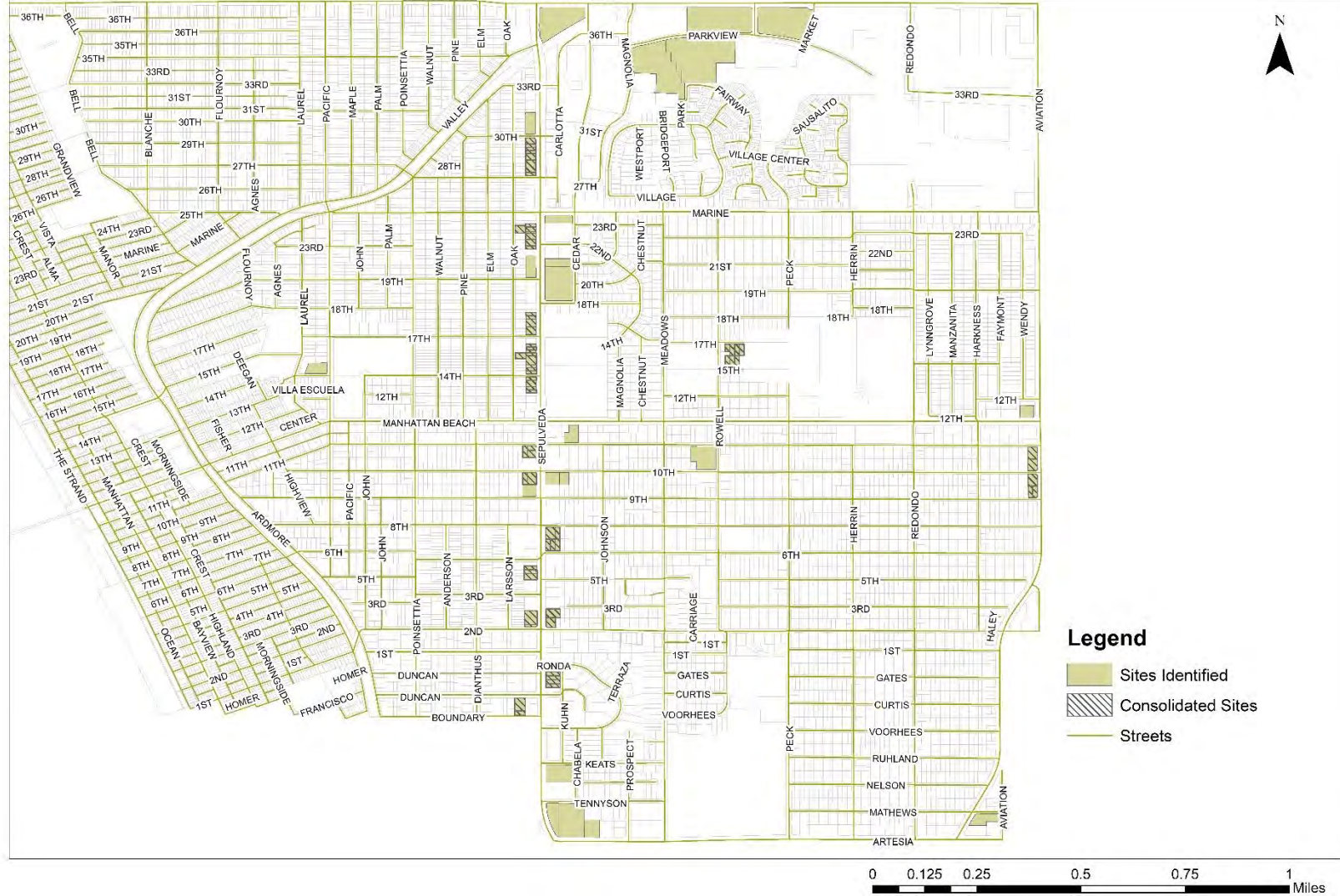


Figure 4. Sites to Accommodate Lower-Income Shortfall and Buffer

## 8 Conclusions

Bound by Rosecrans Avenue to the north, the Pacific Ocean to the west, Redondo Beach and Hermosa Beach to the east and south, the City has developed to the edges of its boundaries. Because the City is nearly entirely built-out and does not have large swaths of land preserved for open space or conservation, there are little to no opportunities to identify new housing capacity on undeveloped lands. The City's housing capacity is identified in the form of underutilized sites that are most suitable for redevelopment. The underutilization of these sites, in combination with their location in high-resource areas and paired with the following programs of the Housing Element, will ensure that the City can realistically meet the RHNA targets at all income levels during the Housing Element planning period:

- Through Program 1, Accessory Dwelling Units, the City will stay current and amend the ADU Ordinance if needed to conform to future amendments to State law, and develop public engagement and informational tools to streamline the approval process and market ADU/JADU construction, including ADUs affordable to lower- and moderate-income households, to achieve an annual average goal of 10 building permits issued for ADUs.
- Through Program 2, Adequate Sites, the City will establish a new overlay district to create the opportunity for several hundred residential units on land that historically only allowed purely commercial uses. As reflected in the previous section, each site identified as a potential site for the Adequate Sites Program's overlay has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.
- Through Program 3, Affordable Housing Streamlining, the City will continue to offer concurrent processing of all discretionary applications for a project and inform developers of the opportunity for concurrent processing. To minimize constraints to the development of affordable housing that may result from discretionary permitting procedures, the City will amend the Zoning Code to ensure Precise Development Plan applications are subject only to an administrative non-discretionary approval process.
- Through Program 7, By-Right Development, the City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified in the Sites Inventory to accommodate the lower-income RHNA that were previously identified in past Housing Elements.
- Through Program 12, Developer Outreach, the City will actively work with the development community to identify ways that lower-income housing may be provided, including housing for extremely low-income households and those with special housing needs. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households. Another outreach effort will inform the development community and property owners about development opportunities for ADUs.
- Through Program 16, Lot Consolidation Incentive, the City will continue to provide an additional density bonus incentive which goes above and beyond what is permitted under State Law. The program will also be amended to provide lot consolidation bonus incentives for sites identified in the Sites Inventory to support the consolidation of small sites 0.3 acres or greater.



- Through Program 19, No Net Loss, the City will use its development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under State law.
- Through Program 22, Parking Reduction in Exchange for Housing at Religious Institution, the City will make Zoning Code revisions to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.
- Through Program 30, Surplus Lands, the City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Report in accordance with the requirements of State law.

Further details on these programs can be found in the Programs section of the Housing Element. HCD's Sites Inventory Form is provided as Exhibit A, below.

# EXHIBIT A

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
MANHATTAN BEACH	3714 HIGHLAND AVE	90266	4137001906	A	North End Commercial (CNE)	CNE, Area District III	0	51.2	0.03	City owned parking	YES - Current	YES - City-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.00	N/A
MANHATTAN BEACH	see above	90266	4137001905	A	CNE	CNE, Area District III	0	51.2	0.05	City owned parking	YES - Current	YES - City-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.00	N/A
MANHATTAN BEACH	see above	90266	4137001904	A	CNE	CNE, Area District III	0	51.2	0.16	City owned parking	YES - Current	YES - City-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.00	N/A
MANHATTAN BEACH	see above	90266	4137001900	A	CNE	CNE, Area District III	0	51.2	0.03	City owned parking	YES - Current	YES - City-Owned	Available	Used in Prior Housing Element - Non-Vacant					see capacity above	LTI ratio 0.00	N/A
MANHATTAN BEACH	1030 MANHATTAN BEACH BLV	90266	4170026003	B	(Local Commercial) CL	CL, Area District I	0	46.6	0.36	Remax Offices, stan	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		9		9	see capacity above	LTI ratio 0.30	Built 1953
MANHATTAN BEACH	1026 MANHATTAN BEACH BLV	90266	4170026004	B	CL	CL, Area District I	0	46.6	0.13	Two-story stand-alk	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				see capacity above	LTI ratio 0.95	Built 1964	
MANHATTAN BEACH	1535 ARTESIA BLVD	90266	4163024028		High Density Residential (RH)	RH, Area District I	0	46.6	0.46	Masonic Center wil	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		9		9	see capacity above	LTI ratio 0.97	Built 1963
MANHATTAN BEACH	1756 MANHATTAN BEACH BLV	90266	4164016002	C	CL	CL, Area District I	0	43.6	0.11	Stand alone buildin	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			11	11		LTI ratio 0.70	Built 1952
MANHATTAN BEACH	1750 MANHATTAN BEACH BLV	90266	4164016003	C	CL	CL, Area District I	0	43.6	0.11	Stand alone building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.27	Built 1952
MANHATTAN BEACH	1762 MANHATTAN BEACH BLV	90266	4164016001	C	CL	CL, Area District I	0	43.6	0.11	Mixed use lot with	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.21	Built 1952
MANHATTAN BEACH	1716 MANHATTAN BEACH BLV	90266	4164016010	D	CL	CL, Area District I	0	43.6	0.11	Stand-alone real est	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.11	Built 1955
MANHATTAN BEACH	939 MANHATTAN BEACH BLV	90266	4170010014	D	CL	CL, Area District II	0	43.6	0.09	Two-story beauty s	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.20	Built 1958
MANHATTAN BEACH	917 MANHATTAN BEACH BLV	90266	4170011014	D	CL	CL, Area District II	0	43.6	0.09	Dentistry with surfa	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.70	Built 1964
MANHATTAN BEACH	921 MANHATTAN BEACH BLV	90266	4170011015	D	CL	CL, Area District II	0	43.6	0.1	Law office with sur	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.51	Built 1962
MANHATTAN BEACH	901 MANHATTAN BEACH BLV	90266	4170011010	E	CL	CL, Area District II	0	43.6	0.1	Stand-alone tax att	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			10	10		LTI ratio 0.65	Built 1963
MANHATTAN BEACH	909 MANHATTAN BEACH BLV	90266	4170011012	E	CL	CL, Area District II	0	43.6	0.09	Two-story real esta	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.00	Built 1958
MANHATTAN BEACH	905 MANHATTAN BEACH BLV	90266	4170011011	E	CL	CL, Area District II	0	43.6	0.09	Vacated stand alone	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.42	Built 1948
MANHATTAN BEACH	828 MANHATTAN BEACH BLV	90266	4170023007	F	CL	CL, Area District I	0	43.6	0.17	Stand-alone dermal	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			7	7		LTI ratio 0.43	Built 1971
MANHATTAN BEACH	1633 ARTESIA BLVD	90266	4163009020	F	HDR	RH, Area District I	0	43.6	0.3	Single Family Resid	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			9	9		LTI ratio 0.15	Built 1950
MANHATTAN BEACH	910 MANHATTAN BEACH BLV	90266	4170025010	F	CL	CL, Area District I	0	43.6	0.12	Single family reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			9	9		LTI ratio 0.13	Built 1941
MANHATTAN BEACH	920 MANHATTAN BEACH BLV	90266	4170025008	F	CL	CL, Area District I	0	43.6	0.12	Two-story real esta	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.93	Built 1978
MANHATTAN BEACH	916 MANHATTAN BEACH BLV	90266	4170025009	F	CD	CD, Area District I	0	43.6	0.12	Triplex with 3 exist	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.25	Built 1949
MANHATTAN BEACH	1216 HIGHLAND AVE	90266	4179004001	G	(Downtown Commercial) CD	CD, Area District III	0	51.2	0.15	Stand-alone two-st	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.35	Built 1946
MANHATTAN BEACH	212 MANHATTAN BEACH BLV	90266	4179020012	G	CD	CD, Area District III	0	51.2	0.03	Retail clothing stor	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.28	Built 1947
MANHATTAN BEACH	1120 MANHATTAN AVE	90266	4179020001	G	CD	CD, Area District III	0	51.2	0.03	Ice cream shop	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.40	Built 1940
MANHATTAN BEACH	208 MANHATTAN BEACH BLV	90266	4179020013	G	CL	CD, Area District III	0	51.2	0.03	Stand-alone gift sh	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.10	Built 1923
MANHATTAN BEACH	1419 HIGHLAND AVE	90266	4179028001	H	CL	CD, Area District III	0	51.2	0.08	Real estate agency	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.29	Built 1956
MANHATTAN BEACH	3515 HIGHLAND AVE	90266	4175024023	H	CNE	CNE-D5/RH, Area Distr	0	51.2	0.09	Stand-alone hair sa	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.98	Built 1965
MANHATTAN BEACH	4005 HIGHLAND AVE	90266	4137009058	H	CNE	CNE, Area District III	0	51.2	0.13	Stand-alone vacate	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.79	Built 1970
MANHATTAN BEACH	953 MANHATTAN BEACH BLV	90266	4170009800	I	CL	CL, Area District II	0	43.6	0.59	Telecommunication	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			20	20		LTI ratio 0.00	N/A
MANHATTAN BEACH	1426 12TH ST	90266	4166009008	I	HDR	RH, Area District II	0	43.6	0.24	Duplex, 2	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.31	Built 1942
MANHATTAN BEACH	1324 12TH ST	90266	4166010006	I	HDR	RH, Area District II	0	43.6	0.16	SFR, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.27	Built 1953
MANHATTAN BEACH	1314 12TH ST	90266	4166010008	I	HDR	RH, Area District II	0	43.6	0.16	SFR, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.33	Built 1956
MANHATTAN BEACH	852 MANHATTAN BEACH BLV	90266	4170024008	I	CL	CL, Area District I	0	43.6	0.09	Mixed-use lot with	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			5	5		LTI ratio 0.24	Built 1952
MANHATTAN BEACH	848 MANHATTAN BEACH BLV	90266	4170024009	I	CL	CL, Area District I	0	43.6	0.09	Stand-alone vacate	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.42	Built 1959
MANHATTAN BEACH	1141 N POINSETTIA AVE	90266	4170014009	I	CL	CL, Area District II	0	43.6	0.05	SFR, detached, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.10	Built 1940
MANHATTAN BEACH	1145 N POINSETTIA AVE	90266	4170014008	I	Medium Density Residential	CL, Area District II	0	43.6	0.11	SFR, detached, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.27	Built 1928
MANHATTAN BEACH	1451 12TH ST.	90266	4166008016	J	RH	RH, Area District II	0	43.6	0.17	Duplex, 2	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.60	Built 1954
MANHATTAN BEACH	1011 MANHATTAN BEACH BLV	90266	4170008027	J	CL	CL, Area District II	0	43.6	0.19	design studio offic	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			13	13		LTI ratio 0.14	Built 1963
MANHATTAN BEACH	1019 MANHATTAN BEACH BLV	90266	4170008028	J	CNE	CL, Area District II	0	43.6	0.2	restaurant with larg	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.44	Built 1952
MANHATTAN BEACH	3520 HIGHLAND AVE	90266	4175017007	K	CNE	CNE-D5, Area District II	0	51.2	0.04	Stand-alone two-st	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.81	Built 1965
MANHATTAN BEACH	3514 HIGHLAND AVE	90266	4175017009	K	CNE	CNE-D5, Area District II	0	51.2	0.04	Commercial building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.88	Built 1946
MANHATTAN BEACH	3608 HIGHLAND AVE	90266	4175016022	L	CNE	CNE, Area District III	0	51.2	0.04	Restaurant/Pub	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.48	Built 1948
MANHATTAN BEACH	312 ROSECRANS AVE	90266	4175016027	L	CNE	CNE, Area District III	0	51.2	0.16	El Porto Building, cl	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.30	Built 1953
MANHATTAN BEACH	3614 HIGHLAND AVE	90266	4175016015	L	CNE	CNE, Area District III	0	51.2	0.04	Real estate and esc	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.31	Built 1939
MANHATTAN BEACH	1711 ARTESIA BLVD	90266	4163008038	M	CL	CL, Area District I	0	43.6	0.3	Graphic design offic	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			10	10		LTI ratio 0.39	Built 1959
MANHATTAN BEACH	315 12TH ST	90266	4179004005	M	CD	CD, Area District III	0	51.2	0.06	Surface parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.01	Built 1965
MANHATTAN BEACH	1213 MANHATTAN AVE	90266	4179022029	M	CD	CD, Area District III	0	51.2	0.03	Stand-alone dentist	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			1	1		LTI ratio 0.52	Built 1924
MANHATTAN BEACH	1409 HIGHLAND AVE	90266	4179028025	M	CD	CD, Area District III	0	51.2	0.07	Stand-alone real est	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.27	Built 1989
MANHATTAN BEACH	3917 HIGHLAND AVE	90266	4137010006	M	CNE	CNE, Area District III	0	51.2	0.04	Surface parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.02	Built 1957
MANHATTAN BEACH	MOONSTONE ST/HIGHLAND	90266	4137008057	M	CNE	CNE, Area District IV	0	51.2	0.06	Surface parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2		LTI ratio 0.01	Built 1966
MANHATTAN BEACH	316 ROSECRANS AVE	90266	4175016005	M	CNE	CNE, Area District III	0	51.2	0.06	Stand-alone restaur	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2		LTI ratio 0.08	Built 1939
MANHATTAN BEACH	HIGHLAND AVE/38TH PL	90266	4137002016	M	CNE	CNE, Area District IV	0	51.2	0.04	Empty parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.00	N/A
MANHATTAN BEACH	EL PORTO ST/OCEAN DR	90266	4137010022	M	HDR	RH, Area District IV	0	51.2	0.03	Empty parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.00	N/A
MANHATTAN BEACH	815 MANHATTAN AVE	90266	4179014013	M	CD	CD, Area District III	0	51.2	0.06	Office building, clot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2		LTI ratio 0.26	Built 1972
MANHATTAN BEACH	1407 12TH ST	90266	4166008007	M	RH	RH, Area District II	0	43.6	0.12	SFR, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element						LTI ratio 0.08	

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Optional Information1	Optional Information2	Optional Information3
MANHATTAN	503 N SEPULVEDA BLVD	90266	4169006006	Capacity captu	10			Shortfall of Sites	0.15	CG	CG	See Program 2	See Program 2	20	TBD during Overl	10	Non-Vacant	Two -Story offi	A	LTI ratio 0.37	Built 1977
MANHATTAN	407 N SEPULVEDA BLVD	90266	4169006005	Capacity captu	0			Shortfall of Sites	0.23	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Small commer	A	LTI ratio 0.14	Built 1954
MANHATTAN	509 N SEPULVEDA BLVD	90266	4169006007	Capacity captu	0			Shortfall of Sites	0.15	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	State Farm res	A	LTI ratio 0.67	Built 1987
MANHATTAN	2909 N SEPULVEDA BLVD	90266	4173027026	Capacity captu	23			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	23	Non-Vacant	Smog check st	B	LTI ratio 1.06	Built 1989
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173027020	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Surface parkin	B	LTI ratio 0.06	Built 1969
MANHATTAN	2905 N SEPULVEDA BLVD	90266	4173027022	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Picture frame	B	LTI ratio 0.00	Built 1947
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173027019	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Medical offices	B	LTI ratio 3.09	Built 1946
MANHATTAN	2701 N SEPULVEDA BLVD	90266	4173027024	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Standalone bul	B	LTI ratio 0.42	Built 1948
MANHATTAN	2705 N SEPULVEDA BLVD	90266	4173027027	Capacity captu	0			Shortfall of Sites	0.39	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Standalone bu	B	LTI ratio 0.22	Built 1974
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173027021	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	surface parkin	B	LTI ratio 0.06	Built 1969
MANHATTAN	2401 N SEPULVEDA BLVD	90266	4171013041	Capacity captu	29			Shortfall of Sites	0.41	MU	CG/RS-D6	See Program 2	See Program 2	20	TBD during Overl	29	Non-Vacant	Coreolgy Plate	C	LTI ratio 0.51	Built 1961
MANHATTAN	2405 N SEPULVEDA BLVD	90266	4171013036	Capacity captu	0			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	One-story build	C	LTI ratio 0.99	Built 1954
MANHATTAN	2301 N SEPULVEDA BLVD	90266	4171013030	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Vacated Enter	C	LTI ratio 0.34	Built 1957
MANHATTAN	2317 N SEPULVEDA BLVD	90266	4171013034	Capacity captu	0			Shortfall of Sites	0.05	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Printing office	C	LTI ratio 0.22	Built 1947
MANHATTAN	2301 N SEPULVEDA BLVD	90266	4171013029	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Parking Lot for	C	LTI ratio 0.00	N/A
MANHATTAN	2309 N SEPULVEDA BLVD	90266	4171013039	Capacity captu	0			Shortfall of Sites	0.2	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Real estate gr	C	LTI ratio 0.54	Built 1957
MANHATTAN	1701 N SEPULVEDA BLVD	90266	4171014034	Capacity captu	13			Shortfall of Sites	0.24	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Auto repair and	D	LTI ratio 0.66	Built 1968
MANHATTAN	1721 N SEPULVEDA BLVD	90266	4171014020	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Two-story build	D	LTI ratio 0.33	Built 1923
MANHATTAN	1725 N SEPULVEDA BLVD	90266	4171014021	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	surface parkin	D	LTI ratio 0.00	Built 1950
MANHATTAN	1717 N SEPULVEDA BLVD	90266	4171014035	Capacity captu	0			Shortfall of Sites	0.24	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto service a	D	LTI ratio 0.31	Built 1972
MANHATTAN	1505 N SEPULVEDA BLVD	90266	4170006017	Capacity captu	21			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	21	Non-Vacant	Duplex with 2	E	LTI ratio 0.22	Built 1949
MANHATTAN	1509 N SEPULVEDA BLVD	90266	4170006018	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone m	E	LTI ratio 0.06	Built 1950
MANHATTAN	1413 N SEPULVEDA BLVD	90266	4170006015	Capacity captu	0			Shortfall of Sites	0.28	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone co	E	LTI ratio 0.26	Built 1955
MANHATTAN	1501 N SEPULVEDA BLVD	90266	4170006022	Capacity captu	0			Shortfall of Sites	0	MU	CG/RS-D6	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Two-story com	E	LTI ratio 0.39	Built 1964
MANHATTAN	1405 N Sepulveda Blvd	90266	4170006028	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Ingress and eg	E	LTI ratio 0.00	N/A
MANHATTAN	1401 N SEPULVEDA BLVD	90266	4170006013	Capacity captu	0			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Veterinarian of	E	LTI ratio 0.34	Built 1948
MANHATTAN	1405 N Sepulveda Blvd	90266	4170006027	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto service st	E	LTI ratio 0.00	N/A
MANHATTAN	1601 N SEPULVEDA BLVD	90266	4170006019	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone sh	E	LTI ratio 0.27	Built 1965
MANHATTAN	1213 N SEPULVEDA BLVD	90266	4170007016	Capacity captu	9			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	9	Non-Vacant	Hair salon and	F	LTI ratio 0.38	Built 1949
MANHATTAN	1309 N SEPULVEDA BLVD	90266	4170007022	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Self-service ca	F	LTI ratio 0.42	Built 1965
MANHATTAN	1301 N SEPULVEDA BLVD	90266	4170007017	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sho	F	LTI ratio 0.19	Built 1949
MANHATTAN	1315 N SEPULVEDA BLVD	90266	4170007021	Capacity captu	0			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone m	F	LTI ratio 0.43	Built 1947
MANHATTAN	917 N SEPULVEDA BLVD	90266	4170037001	Capacity captu	9			Shortfall of Sites	0.32	CG	CG	See Program 2	See Program 2	20	TBD during Overl	9	Non-Vacant	Stand-alone co	G	LTI ratio 0.40	Built 1956
MANHATTAN	1048 10TH ST	90266	4170037002	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Surface parkin	G	LTI ratio 0.01	N/A
MANHATTAN	708 N SEPULVEDA BLVD	90266	4167026012	Capacity captu	10			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	10	Non-Vacant	Corner lot with	H	LTI ratio 0.87	Built 1955
MANHATTAN	1116 8TH ST	90266	4167026011	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Two-story offi	H	LTI ratio 0.43	Built 1968
MANHATTAN	201 N SEPULVEDA BLVD	90266	4169014016	Capacity captu	12			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	12	Non-Vacant	Garden center	I	LTI ratio 0.27	Built 1954
MANHATTAN	207 N SEPULVEDA BLVD	90266	4169014048	Capacity captu	0			Shortfall of Sites	0.53	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone ga	I	LTI ratio 0.33	Built 1974
MANHATTAN	200 N SEPULVEDA BLVD	90266	4167023013	Capacity captu	13			Shortfall of Sites	0.28	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Stand-alone cu	J	LTI ratio 0.05	Built 1941
MANHATTAN	222 N SEPULVEDA BLVD	90266	4167023032	Capacity captu	0			Shortfall of Sites	0.37	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sh	J	LTI ratio 0.13	Built 1964
MANHATTAN	224 S SEPULVEDA BLVD	90266	4168025008	Capacity captu	13			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Two-story com	K	LTI ratio 0.75	Built 1952
MANHATTAN	204 S SEPULVEDA BLVD	90266	4168025011	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Pet supply stor	K	LTI ratio 0.46	Built 1980
MANHATTAN	208 S SEPULVEDA BLVD	90266	4168025010	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sho	K	LTI ratio 0.20	Built 1953
MANHATTAN	210 Sepulveda Blvd	90266	4168025009	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Large surface	K	LTI ratio 0.04	N/A
MANHATTAN	975 N AVIATION BLVD	90266	4164003027	Capacity captu	12			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	12	Non-Vacant	Small commer	L	LTI ratio 0.52	Built 1984
MANHATTAN	909 N AVIATION BLVD	90266	4164003022	Capacity captu	0			Shortfall of Sites	0.16	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Small commer	L	LTI ratio 0.39	Built 1972
MANHATTAN	1853 9TH ST	90266	4164003030	Capacity captu	0			Shortfall of Sites	0.15	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Single Family	L	LTI ratio 0.50	Built 1952
MANHATTAN	1853 10TH ST	90266	4164002032	Capacity captu	13			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Cleaners, Sme	M	LTI ratio 0.20	Built 1957
MANHATTAN	1075 N AVIATION BLVD	90266	4164002001	Capacity captu	0			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	One-story com	M	LTI ratio 0.25	Built 1953
MANHATTAN	1021 N SEPULVEDA BLVD	90266	4170027001	Capacity captu	9			Shortfall of Sites	0.13	CG	CG	See Program 2	See Program 2	20	TBD during Overl	9	Non-Vacant	Two-story stan	N	LTI ratio 1.49	Built 1948
MANHATTAN	1048 11TH ST	90266	4170027003	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Surface parkin	N	LTI ratio 0.05	N/A
MANHATTAN	1015 N SEPULVEDA BLVD	90266	4170027023	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone re	N	LTI ratio 0.15	Built 1992
MANHATTAN	600 N SEPULVEDA BLVD	90266	4167026014	Capacity captu	10			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	10	Non-Vacant	Surface parkin	O	LTI ratio 0.00	N/A
MANHATTAN	1117 6TH ST	90266	4167026016	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sho	O	LTI ratio 0.14	Built 1970
MANHATTAN	1111 6TH ST	90266	4167026015	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	One-story stan	O	LTI ratio 0.61	Built 1944
MANHATTAN	1416 17TH ST MANHATTAN BEACH	90266	4166007013	Capacity captu	5			Buffer	0.16	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	5	Non-Vacant	Duplex, 2 - Bu	P	LTI ratio 1.56	Built 1973
MANHATTAN	1410 17TH ST MANHATTAN BEACH	90266	4166007014	Capacity captu	0			Buffer	0.16	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	see above	Non-Vacant	SFR, detached	P	LTI ratio 0.03	Built 1965
MANHATTAN	1420 17TH ST MANHATTAN BEACH	90266	4166007012	Capacity captu	0			Buffer	0.16	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	see above	Non-Vacant	Duplex, 2 - Bu	P	LTI ratio 0.71	Built 1971
MANHATTAN	1406 17TH ST MANHATTAN BEACH	90266	4166007018	Capacity captu	0			Buffer	0.13	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	see above	Non-Vacant	Duplex, 2 - Bu	P	LTI ratio 0.25	Built 1957
MANHATTAN	1411 15TH ST MANHATTAN BEACH	90266	4166007009	Capacity captu	4			Buffer	0.17	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	4	Non-Vacant	Duplex, 2 - Bu	Q	LTI ratio 1.30	Built 1946
MANHATTAN	1407 15TH ST MANHATTAN BEACH	90266	4166007008	Capacity captu	0			Buffer	0.17	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	see above	Non-Vacant	Duplex, 2 - Bu	Q	LTI ratio 0.21	Built 1955
MANHATTAN	1417 15TH ST MANHATTAN BEACH CA 90266	90266	4166007010	Capacity captu	0			Buffer	0.17	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	see above	Non-Vacant	Duplex, 2 - Bu	Q	LTI ratio 1.72	Built 1959
MANHATTAN	1041 BOUNDARY PL	90266	4169024005	Capacity captu	8			Buffer	0.15	MDR	RM	See Program 2	See Program 2	0							

# Appendix F: Community Engagement Summary

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## 1. Introduction

The City of Manhattan Beach (City) conducted a robust public outreach program that engaged a broad spectrum of the community and stakeholders. Engagement related to the Housing Element update has attempted to be comprehensive while in the context of the COVID-19 pandemic. Stay-at-home orders of 2020 and 2021 provided the City with opportunities to explore new avenues for public engagement and increased access for those who are traditionally not involved in the planning process. Outreach and formal engagement activities were held virtually across a variety of platforms. Community engagement and outreach was solely done in English. While this is assumed to not be a linguistic barrier to participation for the City's population (98 percent of the population per 2019 Census data comes from an English-only-speaking household or speak English "very well"), the City is aware of local and regional demographic changes and will continue to monitor the need for any linguistic services in future outreach endeavors. Feedback collected throughout the public outreach program was used to inform the goals, policies, and programs of the Housing Element and ensure that the City maintains the quality of life residents and visitors enjoy while planning for future housing needs.

All public meetings were promoted via the City's three social media platforms (Facebook, Twitter, and Instagram), the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list, and newspaper ads. Meetings were noticed at least 9 days prior to the event. Social media content for each meeting was, on average, displayed over 21,000 instances, reaching more than 11,200 individuals. By promoting the outreach events via digital and print methods, the City was able to reach a large portion of the population, including low-income residents, renters, and other groups often left out of the formal planning process. The following outreach activities were conducted to engage stakeholders and inform development of the Housing Element.

## 2. City Council Meetings

### 2.1 City Council Meeting 1

The first presentation to the City Council occurred on August 24, 2021. The meeting was promoted via the City's three social media platforms (Facebook, Twitter, and Instagram), the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which includes the Chamber of Commerce, seniors club, Homeowners Association (HOA), local organizations which represent various groups including lower-income groups, and individuals to ensure all income groups are represented in the data and throughout the development of the Housing Element. Council members were presented an introduction to the Housing Element update process; background data, including income category levels; and a brief discussion on the City's Regional Housing Needs Allocation of 774 units. The Mayor and Council Members responded to the presentation and offered their perspectives.

City staff received feedback from City Council noting the lack of vacant land in the City, which presents a challenge to opportunities for new housing development. Other feedback included the need for density bonus programs to incentivize the production of affordable housing by private developers. City staff provided additional detail on the City's existing, streamlined development process in certain zones, which

will be carried over to the updated Housing Element. A recording of the City Council meeting is available on the City's website.

## 2.2 City Council Meeting 2

The second presentation to City Council occurred on September 21, 2021, at 6:00 p.m. Again, the meeting was promoted via the City's social media platforms, the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which as previously mentioned includes the Chamber of Commerce, seniors group, individuals, and organizations which represent lower-income groups and people experiencing homelessness, to ensure all income groups are represented in the data and throughout the development of the Housing Element. Staff presented an overview of the Housing Elements process; progress completed to date, including the Review of 5th Cycle Housing Element, Needs Assessment, and Affirmatively Furthering Fair Housing Analysis; and an overview of existing conditions in Manhattan Beach as it pertains to the Housing Element update process. Staff also presented on State regulatory mandates, including Senate Bill 35, Assembly Bill 101, and Assembly Bill 671, and policy development. Staff also provided an overview of the Sites Analysis and Inventory process.

City Council asked for clarification on the how building year is used to identify redevelopment opportunities, asked about accessory dwelling unit regulations, and commented on the potential for duplexes in areas zoned for single-family homes. A recording of the City Council meeting is available on the City's website.

## 3. Stakeholder Workshop

A stakeholder workshop occurred on August 31, 2021, and allowed interested parties to be engaged in a more formal setting where they learned about the Housing Element background and purpose, existing conditions and data, the project process and scope, and the next steps. Similar to noticing for previous meetings, the workshop was promoted via the City's social media platforms, the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which includes organizations representing lower-income groups and people experiencing homelessness, to ensure all income groups are represented in the data and throughout the development of the Housing Element. The workshop was held during a weekday evening, outside of traditional working hours, and streamed live via Zoom to facilitate participation from local non-profits, community leaders, and the public. This workshop was also available via a call-in number to ensure persons without internet access could join. Participants present included residents, property owners, and employees who work within the City. Community members asked questions related to housing development opportunities and mixed uses in commercial zones (General Commercial [CG] District, North End Commercial [CNE], and Downtown Commercial [CD]). A recording of the stakeholder meeting is available on the City's website.

### 3.1 Interactive Poll

During the stakeholder meeting, attendees were asked to participate in a poll, which led to feedback from the community to gauge their priorities and identify areas where they would like to see future growth accommodated. Seven individuals submitted responses to one or more questions. The poll indicated that participants highlighted housing affordability and availability of rental units as the most urgent housing

needs in the City. When asked what barriers are slowing the building of more diverse and affordable housing, participants noted lack of available land and development costs. The attendees suggested increasing density, mixed-use, and more housing along commercial corridors as the best strategies to satisfy the City's 6th Cycle Regional Housing Needs Allocation.

#### 4. Planning Commission Meeting

A Planning Commission meeting occurred on September 15, 2021. The meeting was promoted via the City's social media platforms, the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which as previously mentioned includes the Chamber of Commerce, senior groups, individuals, and organizations which represent lower-income groups and people experiencing homelessness, to ensure all income groups are represented in the data and throughout the development of the Housing Element. Planning Commission members were provided with an overview of the Housing Element, including its purpose and required components, and outreach efforts to date as well as upcoming events. An introduction to the Sites Inventory, goals, policies, and programs was also presented by City staff.

Following the presentation, public attendees and Planning Commissioners were invited to engage in an open discussion. Commissioners asked for clarification on the approval process. Concern over incentivizing residential development along major commercial corridors was voiced. A recommendation of allowing mixed-use along these commercial zones was mentioned in response. Furthermore, Planning Commissioners noted concern over increased height, which would adversely impact view corridors. Greater density along Aviation Boulevard, Rosecrans Avenue, and Manhattan Beach Boulevard was recommended, along with encouraging smaller units, such as accessory dwelling units. More clarification related to the Sites Inventory was provided through discussion. A member of the public commented that more than 70 percent of the City is zoned to allow low-density, single-family detached units, therefore restricting the potential capacity of higher-density developments. This member of the public suggested that staff look at the potential of allowing duplex and triplex units in residential zones outside of the major corridor. The term "built-out" previously used by a Planning Commissioner to describe the density and planning capacity of the City was criticized as being subjective. More members of the public supported this notion. Another member of the public voiced a concern regarding the ability to accommodate a number of parking spaces per townhome based on the current requirements of the City. A member of the Planning Commission clarified that the requirements for parking may be less stringent, as they are dictated by State law and not the City's regulation if a density bonus project is, in fact, proposed.

#### 5. Hometown Fair

City staff was present at an information booth at the Hometown Fair on October 2, 2021. The Hometown Fair is organized by the community in partnership with the City and provides a platform for local businesses, entrepreneurs, artists, and local non-profits to connect with the community. Community members are also provided a platform to promote their civic cause and connect with other community members, both individuals and businesses. During the Hometown fair, fliers promoting the forthcoming public review period were distributed to the public. City staff were also available to answer any questions regarding the Housing Element update process and fielded high-level inquiries about the process in

general. Through the Hometown fair, the City was able to include all members of the community including of various races and ethnicities, and ensure that all persons, including lower-income groups, had an opportunity to connect with City staff, learn about the Housing Element update, and be able to provide feedback on the upcoming public review draft.

## 6. Public Comments

The Housing Element 6th Cycle Public Review Draft was posted to the City’s website on October 20, 2021 and ended on November 19, 2021. In addition to posting the public review draft to the City’s website, the draft was also advertised through the local newspaper, the City’s social media platforms, a notice informing stakeholders was posted at City Hall, and hard copy of the draft was also available at City Hall. An email to interested parties, which includes organizations that represent lower-income groups and people experiencing homelessness, was also sent to notify them of the availability of the public review draft. As mentioned in Section 5, Hometown Fair, above, the City also held an informational booth prior to the release of the public review draft where City staff distributed noticing fliers. Staff also answered questions about the Housing Element and provided an overview of the purpose of the Housing Element to prepare residents for the public review draft. Since outreach throughout the update of the Housing Element has been comprehensive in reaching all members of the community, including lower-income groups, the public review draft noticing methods was able to reach a wide-range of community members. Four public comments were received during the public review period. The general nature of the comments include misinterpretation of comments received during a public workshop included in Appendix F; regarding the unfeasible sites identified for low-income housing in Appendix E; compliance with Affirmatively furthering fair housing as it relates to, identifying site capacity to satisfy the City’s RHNA by encouraging mixed-used development, city-wide election requirements, efforts to integrate single family neighborhoods and racially concentrated areas of affluence, and lack of protection against air and noise pollution along Pacific Coast Highway, Sepulveda Blvd., and Manhattan Beach Blvd. Public comments also provide notes and questions regarding various goals and programs included in the Housing Element.

The City has made a diligent effort to correct, address, and incorporate feedback provided, and information requested in the public comments in the Housing Element. The comments from the four comment letters received (see comment letter 1 through 4 attached) are included in **Table 1, Public Comment Summary**, which provides a response and a summary of the changes made to the Housing Element.



**Table 1. Public Comment Summary**

Table ID	Comments	Response/ Changes Made
Refer to public comment letter – Comment Letter 1		
1	<p>Quick clarification: On page F-2 and F-3, there is a section referring to public comments: "A member of the public mentioned that while the City is built-out," That member of the public was me. I did say MB is a low density city, but I didn't say MB was "built-out". I said the term "built-out" has no official definition or designation, and the claim that MB is "built-out" is highly subjective and not very convincing, especially considering MB is +70% zoned for single family detached homes which greatly restricts the potential capacity for more homes.</p> <p>Also, I don't mean to speak for this person, and you can check the transcript, but I think that "Another member of the public voiced concern over parking regulations and traffic impacts resulting from multifamily housing and increased densities." is incorrect as well. That member of the public was expressing concern that the city's excessive parking requirements are inhibiting the development of townhomes. I don't think their comment was implying townhomes have a significant negative effect on parking or traffic.</p>	Appendix F has been updated to correct the intent of the public comments received during the public meetings.

Refer to public comment letter – Comment Letter 2

2	<p>Please provide a rationale for including Goal 3: Provide a safe and healthy living environment for City residents and the policies associated with the goal (pg4), Program 10: Energy Conservation and Energy Efficiency Opportunities (page 15), program 27: Water Conservation and Green Building Standards (pg31).</p> <p>It talks about the city's sustainability program but why is it included in this document? Is it required or was it requested to be included by someone?</p> <p>Also why would this document suggest that the city go beyond state required energy requirements?</p> <p>Also how will increasing the cost of housing increase the housing stock, in fact the rate of new housing will decrease?</p>	<p><b>The Draft Housing Element simply references the City's efforts related to encouraging the use of alternate energy, resource efficiency, and other green building regulations to demonstrate our commitment to "Goal 3" of the Housing Element, which is to provide a safe and healthy living environment for City residents. I'll note that the current (5th cycle) Housing Element includes the same goal. This goal does not in any way dictate specific actions on green building or energy-related regulations; rather it demonstrates that housing is interlinked with these broader policies that do, in turn, impact the health and safety of our residents. These general policies in the Housing Element do not conflict with Council's specific actions and direction (past or future) on the matters. To further clarify the comment about considering opportunities above and beyond State requirements, this relates to specific standards within the Green Building Code that are customized for local implementation, which is how the code in effect today was adopted for certain regulations. The Housing Element does not suggest or propose the increase cost of housing will increase the housing stock.</b></p>
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Refer to public comment letter – Comment Letter 3		
3	<p>"Manhattan Beach's Housing Element finds that there are inadequate sites for low income housing. It therefore proposes to rezone various ""sites"" for low income housing, listed on p E-23 to E-26. But these ""sites"" are not sites; they are collections of parcels with various ownerships. Consider Site 5, listed on p E-23 (See original comment or reference page number).</p> <p>This is all the parcels on a city block that face Highway One, no fewer than nine parcels, with, presumably, nine different ownerships. There's a duplex, a two story sports bar, a marketing agency, and a veterinarian's office. A potential low income builder would have to obtain rights to all nine of these parcels, parcels with, apparently, ongoing uses, in order to build a meager 21 units. There is no way any builder would think this was feasible, particularly when they would only be allowed to build 21 units on the resulting site.</p> <p>This is just one example of many. Site 2 has eight parcels. Site 3 has 7 parcels. Site 9 has 5 parcels.</p> <p>Manhattan Beach needs to supply substantial evidence to support the idea that these parcels could be feasibly be consolidated. If there is no such evidence, these ""sites"" need to be replaced with sites that would be feasible. "</p>	<p>The Sites Inventory has been modified to include a clear analysis of lot consolidation efforts in the City and examples of consolidated sites in surrounding cities to support consolidated sites identified in the existing capacity and overlay district. The average and median parcel sizes in the City are considered small and it can be expected that developers will consolidate multiple parcels in order to develop larger multifamily developments and will also likely develop more units than identified as calculations at 20 dwelling units per acre are considered the minimum. Appendix E, sections 4.1.1, 5.1 and 5.2 have been revised to include a more thorough analysis of consolidated sites in the City, including consolidated sites with multiple parcel ownership. Additionally, Program 16, in the Housing element also supports consolidation of sites. A site feasibility study given market and development trends has been included in under section 7.1 of Appendix E.</p>

Refer to public comment letter – Comment Letter 4		
4a	<p>Hello, I'm a Manhattan Beach resident.</p> <p>I appreciate all the hard work that went into the housing element draft so far, including navigating the many requirements from state agencies. I think we all want a swift and efficient approval from HCD. That being said, I have some comments on aspects which are keeping this draft from compliance and risk HCD rejection:</p> <p>First, an excerpt from the AFFH memo:</p> <p><b>“Affirm “Affirmatively” furthering fair housing” means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.</b></p> <p>Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing <b>extends to all of a public agency’s activities and programs relating to housing and community developmentatively furthering fair housing” means taking meaningful actions, in addition to combating disc.</b></p>	<p>The City understands the need for and is committed to its duty to affirmatively further fair housing.</p>

4b	<p>1) Focusing almost entirely on mixed-use development with little history or evidence of significant results.</p> <p>Similar to most other South Bay cities, MB is apparently focusing mostly on encouraging mixed-use development to satisfy RHNA requirements. The problem though, is that Manhattan Beach has made similar changes in the past (as noted in the draft) yet has permitted few mixed-use residential developments, and an even smaller subset of those have actually been built. Please include real world evidence in the draft that demonstrates how these further changes will result in a significantly increased likelihood of mixed-use development. This evidence should include the times and places that the city made contact with local developers to get their input on what would make such development viable.</p>	<p>Development of larger multifamily development and affordable housing in the City and surrounding cities has been limited; therefore, the Housing Element relies on available development trends, including planned projects, and market conditions to support the feasibility of residential infill development on sites identified to accommodate the RHNA shortfall. Appendix E, Section 7, has been revised to include a more thorough analysis. The comment mistakenly notes that the City is relying on mixed-use development to satisfy RHNA requirements, while the sites will allow for mixed-use type of development, similar to other zones in the City, the overlay will allow 100% residential development and require at least 50 % of residential development through Program 2, Adequate Sites. The City is incentivizing residential development on these sites through programs in the housing element. The comment notes that few mixed-use residential developments have been permitted and less have been built despite previous City efforts; however, the City does not have control over what is developed but is responsible for ensuring there is capacity in the City. Nevertheless, the City can incentive development through regulatory and financial incentives which are expanded on in Appendix E, section 7.</p>
4c	<p>2) MBMC Section 10.12.030 (city-wide election requirement) is not a valid reason to be out of compliance with AFFH. In fact, that covenant is itself a violation of AFFH.</p> <p>As stated in the AFFH memo, a fair housing issue is a condition in a geographic area of analysis that restricts fair housing choice or access to opportunity. The statute mentioned on page 36 is precisely that kind of condition. There needs to be a plan included in the housing element to amend those kinds of "rules", it shouldn't be used as an excuse to avoid further changes. It's also unclear what "preserve residential neighborhoods" mean exactly. Preserving from what?</p>	<p>The AFFH memo lists "voter initiatives that restrict multifamily housing developments, rezoning to higher density, height limits or similar measures that limit housing choices" <b>as an example of common zoning and land use barriers to AFFH.</b></p> <p>As analyzed and explained in Appendix C of the Housing Element, the city-wide election requirements included in Section 10.12.030 of the MBMC do not restrict multifamily housing developments and are not considered a constraint to development.</p> <p>In accordance with Government Code Section 65583, the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Programs in the Housing Element, such as Program 4, 23, and 26, aim to preserve the existing housing stock, including the existing affordable housing stock and existing housing capacity.</p>

4d	<p>3) No effort has been made to integrate any single family neighborhood, including the racially concentrated areas of affluence.</p> <p>As noted in the draft, Manhattan Beach has staggering levels of both racial and class-based segregation. At the same time, the percentage of single family zoning is high even for the South Bay region. I'm not sure how you can acknowledge this reality in the draft yet do absolutely nothing to address it. These kinds of land use policies, which dominate MB, contribute significantly to the cost of housing by constraining supply.</p>	<p>Although Appendix D does note that Manhattan Beach has staggering levels of both racial and class-based segregation, the comment does not note that this has been identified as a regional issue. The City is limited to changes to reverse these patterns within City boundaries which several programs of the housing element aim to reverse. With regard to integrating single-family neighborhoods including radically concentrated areas of affluence (RCAA), it should be noted that HCD criteria for adequate zones for lower-income RHNA limit the Sites Analysis to identify any lower-income units within Single-family, low-density zones, which includes some of the RCAA identified in Appendix D. The City has added new programs which are tied to County resources and programs to contribute to reversing these segregation patterns at a regional level.</p>
4e	<p>4) No protection against air pollution and noise pollution along PCH/Sepulveda and Manhattan Blvd.</p> <p>Only allowing multifamily residences along high traffic corridors is not a practice that should continue for obvious reasons. Manhattan Beach's own city planning guide recognizes the disruption caused by air/noise pollution, and has attempted to ameliorate in the past with physical infrastructure (The Oak Avenue Overlay District). Single family homeowners should not have exclusive access to fresh air. This should be addressed in the draft.</p> <p>In conclusion, this draft is well-meaning and better in many ways than the drafts of other South Bay cities (looking at you, Hermosa and Redondo). But in its current state, it's obviously attempting to take the path of least resistance by avoiding any changes to the 77% of the city which is composed of highly exclusionary and segregated neighborhoods. There's so many unaddressed issues (reforming the city-wide election requirement, etc). Until a serious attempt is made to address those, I feel it's inadequate and risks being rejected by HCD.</p>	<p>The Housing Element Update is a policy document, consisting of a housing program, and its adoption would not, in itself, result in specific development or construction at this time. A Negative Declaration was prepared for this project analyzes Air Quality, pursuant to CEQA. Any project under CEQA would be subject to additional analysis as required by CEQA.</p>

## 7. Presentation Materials

The following sections provide an overview and copies of the presentation materials used during the City Council meetings, Planning Commission meeting, stakeholder workshop, the Hometown Fair, and results from the interactive poll.



# Manhattan Beach Housing Element Update

PRESENTED BY THE COMMUNITY DEVELOPMENT DEPARTMENT

AUGUST 24, 2021

## What is a Housing Element?

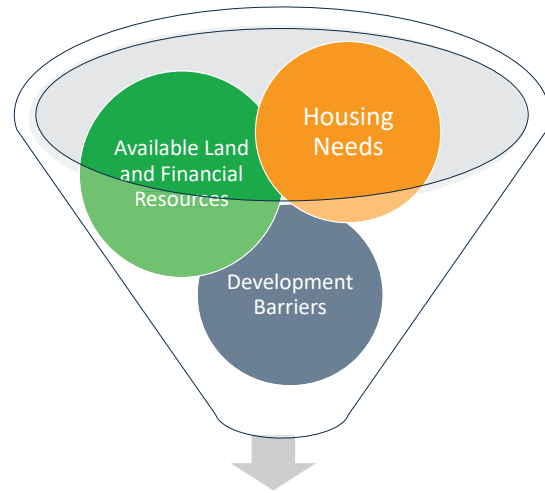
A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029)





# What is the purpose of the Housing Element?

- Identify barriers to housing production
- Identify housing needs
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified



Housing Action Plan

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# What does the data show?



## Changing Population

- Changing Needs
- Older adults



## Affordability

- Housing Overpayment
- Median Sale Price



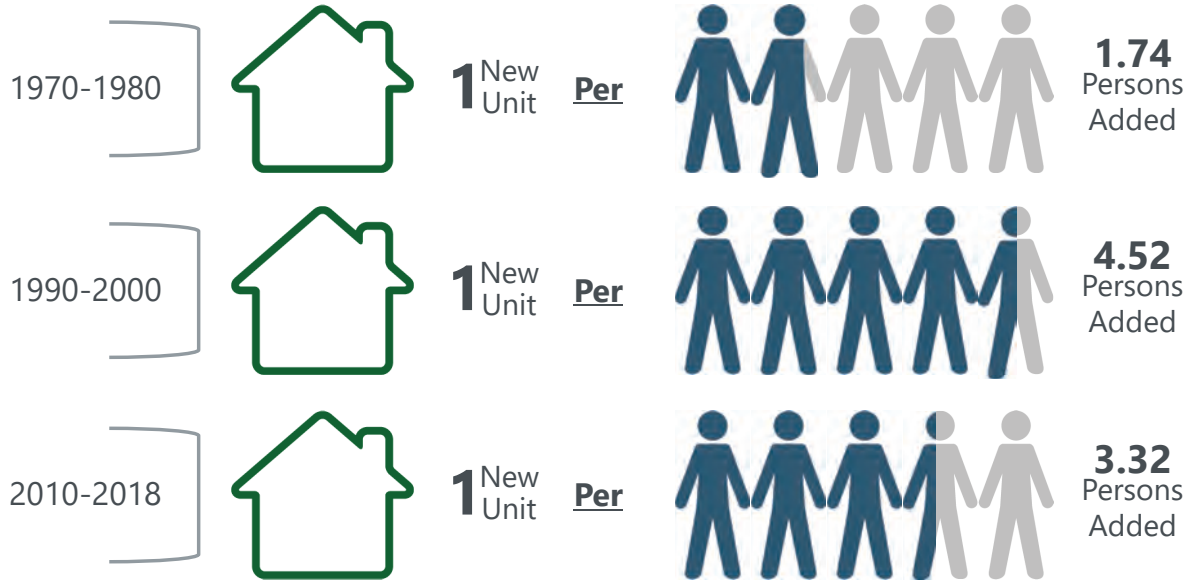
## Housing Options

- Housing Supply



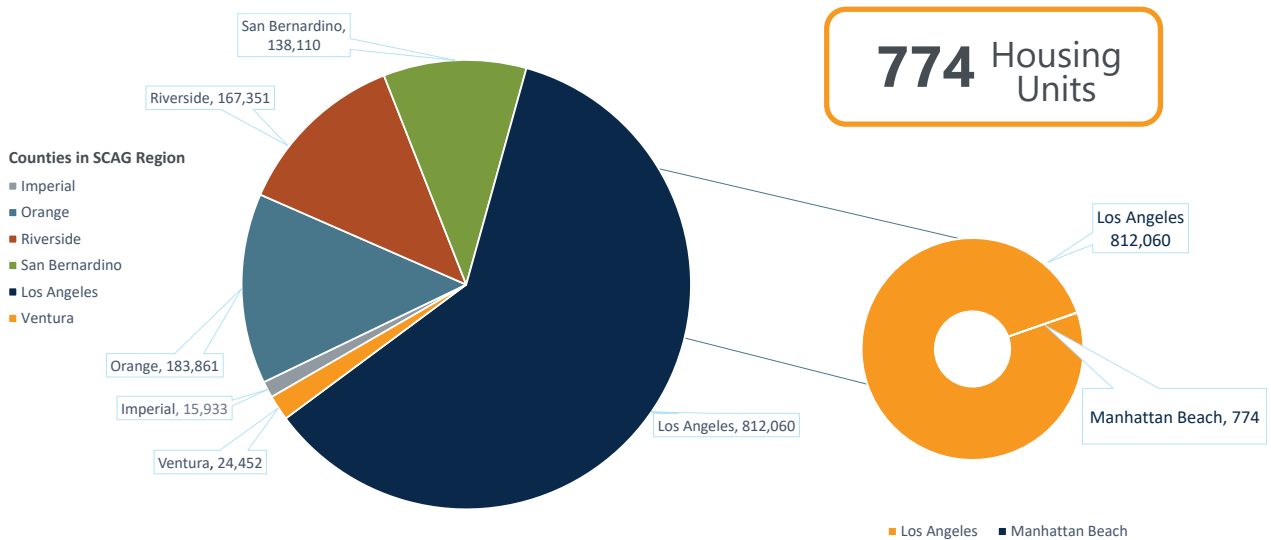
4

# What does the data show?



5

# How many housing units does Manhattan Beach have to plan for?



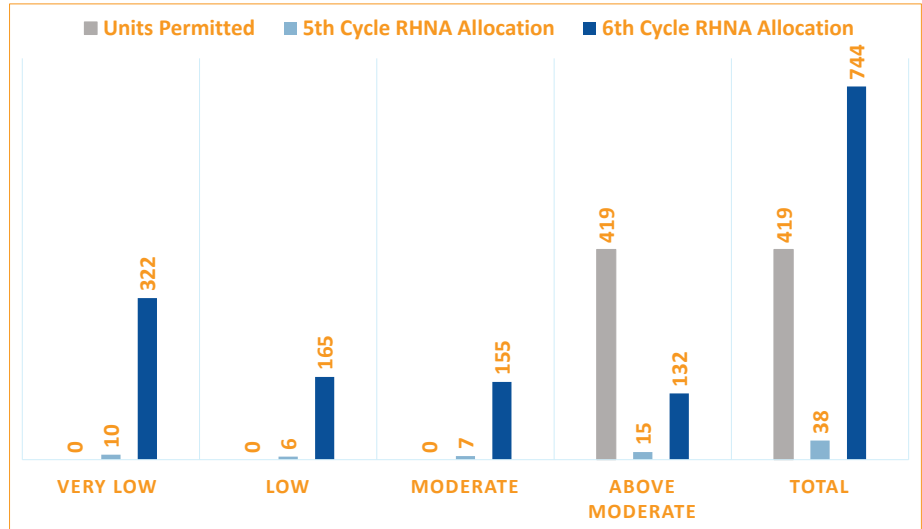
6

# 5<sup>th</sup> Cycle RHNA Progress

Data Reported 2014-2020

**5<sup>th</sup> Cycle  
Average  
Units  
Permitted  
Per Year = 60**

**6<sup>th</sup> Cycle  
Average Units  
Permitted Per  
Year Needed  
= 90**



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## Housing Element Components



# Barriers to Development

## Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

## Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

## Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

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# Pathways to Development

## Tools in the Toolbox



### Regulations

- Design Standards
- Parking

### Incentives

- Bonuses
- Streamlining
- Regulatory Relief



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# Policy Framework



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# Timeline

Task	Date
Project Kick-Off	July 29, 2021
Prepare Housing Element Draft	August 2 – September 10, 2021
Stakeholder Engagement	August 31, 2021
City Council Study Session	September 21, 2021
Planning Commission Study Session #1	September 22, 2021
Optional Study Session #2	October 2021
Submit Draft to HCD	October 1, 2021
Public Review Period	October 11 – November 25, 2021
Public Hearings (PC and CC)	January – February
Adoption Deadline	February 12, 2022

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Thank you!

Additional questions  
or comments?

Contact us at:  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)

## 7.1 City Council Meeting 1

The City Council presentation occurred on August 24, 2021. A copy of the PowerPoint used for the presentation is provided as **Exhibit A**. The PowerPoint provided a detailed description regarding what a Housing Element entails, and a brief overview of how the City is assigned its Regional Housing Needs Allocation.

# EXHIBIT B



## Manhattan Beach Housing Element Update

City Council

September 21, 2021



### Overview

**01** Project Overview

**04** Sites Analysis

**02** Barriers to Development

**05** Next Steps

**03** Policy Framework

**06** Discussion and Q & A





# What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029) required by the State.



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# 2021 Income Limits

Los Angeles County Area Median Income (AMI): \$80,000\*

\*This is the AMI for a four-person household.

Income Level	% AMI Range	Income Limit	HCD-Adjusted Income Limit
Very Low	<50% AMI	<\$40,000	<\$59,100
Low	50% -80% AMI	<\$64,000	<\$94,600
Moderate	80% - 120% AMI	<\$96,000	<\$96,000
Above Moderate	>120% AMI	>\$96,000	>\$96,000

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## What is the purpose of the Housing Element?

- Identify housing needs
- Identify barriers to housing production
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified



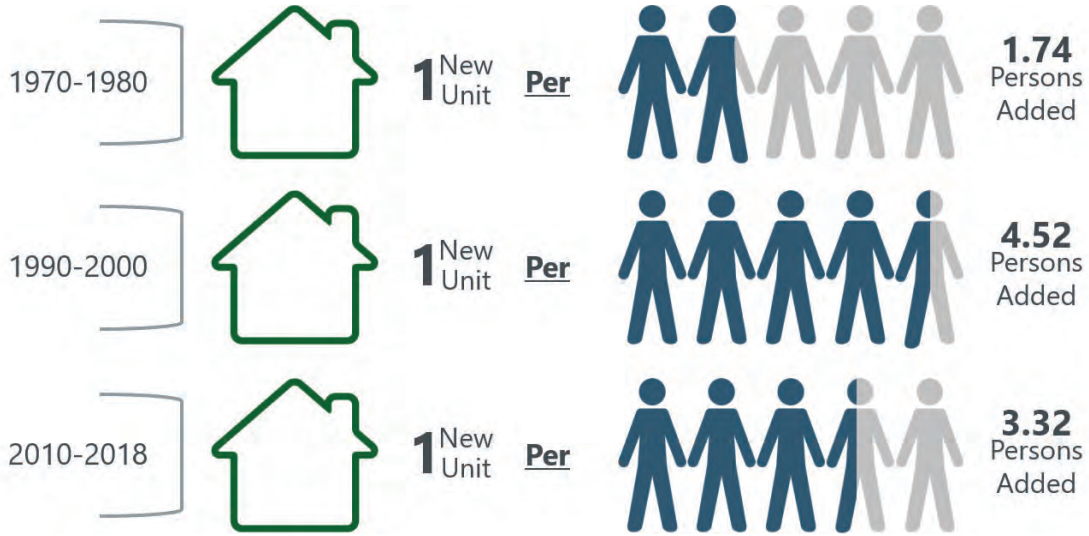
*Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.*



## What does the data show?



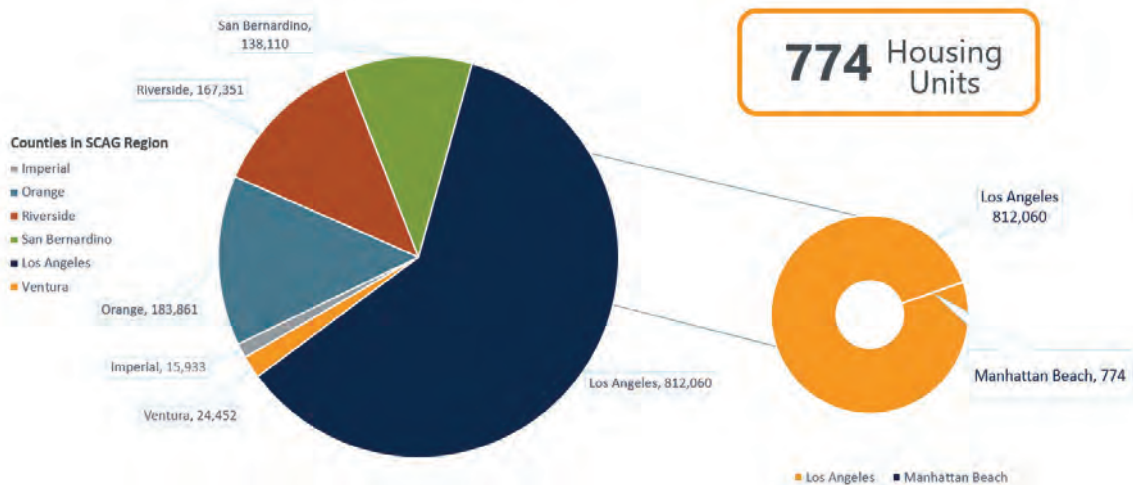
# What does the data show?



7



# How many housing units does Manhattan Beach have to plan for?



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## 5th Cycle RHNA Progress Data Reported 2014-2020

**5<sup>th</sup> Cycle  
Average  
Units  
Permitted  
Per Year = 52**

**6<sup>th</sup> Cycle  
Average Units  
Permitted Per  
Year Needed  
= 96**

Income Level	4 <sup>th</sup> Cycle (2005-2013) RHNA	5 <sup>th</sup> Cycle (2013-2021) RHNA	6 <sup>th</sup> Cycle (2021-2029) RHNA	Permitted Since 2014
Very-Low	236	10	322	0
Low	149	6	165	0
Moderate	160	7	155	0
Above Moderate	350	15	132	419
<b>Total</b>	<b>895</b>	<b>38</b>	<b>774</b>	<b>419</b>

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## Housing Element Components



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# What are the barriers to development?

## Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

## Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

## Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

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# Framing Our Policies

Step 1: Review of 5<sup>th</sup> cycle goals (what to carry forward, what needs modification)

- *Goal 1 - Preserve existing neighborhoods- carry policies forward with minor modifications*
- *Goal 2 - Provide a variety of housing opportunities- requires modification and updating*
- *Goal 3 - Provide a safe and healthy living environment for City residents - carry forward*
- *Goal 4 - Encourage the conservation of energy in housing - carry forward*

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## Framing Our Policies

### Step 2: Development of new policies for 6<sup>th</sup> cycle

- *SB 35* - Amend internal procedures and zoning code to include SB 35 streamlining in permitting processes and procedures.
- *AB 1763/SB 2263* - Review and amend its local Density Bonus Program Ordinance to ensure consistency with State requirements.
- *AB 671* - Adopt an ordinance that incentivizes affordable ADUs
- *AB 101* - Amend zoning code to allow low barrier navigation centers
- *AB 1851* - Amend the zoning code to identify a process by which parking requirements can be reduced for religious institutions that would eliminate religious-use parking spaces in exchanged for housing developments

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## Sites Analysis - State Requirements

- Adequate Lower-Income Unit Zone
- Has an Improvement-to-Land Ratio (IL Ratio) less than or equal to 1
- Building was built before 1970-1990
- Site is greater than or equal to 0.5 acres
- Realistic Capacity at 20 du/acre  
(*Net Units are greater than or equal to 1*)
- Given that more than 50% of our capacity will be from non-vacant land, sites for the lower income capacity will need to be supported with evidence that the existing use is not an impediment (no sites with large chains/essential uses)

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# Existing Lower-Income Capacity Identified

Capacity Identified						
Site Key	APNs	Address	Zone	Acres	Uses	Net Units
1a*	4163-008-023 4163-008-024 4163-008-038	Artesia Blvd / Redondo Ave.	CL	0.62	Closed antique shop, single family residential, offices	12
1b*	4137-001-900 4137-001-904 4137-001-905 4137-001-027	Rosecrans Ave./Highland Ave.	CNE	0.52	Parking, Restaurant	10
1c*	4179-005-003 4179-005-004 4179-005-005 4179-005-006 4179-005-007 4179-005-903	Morningside Dr / Manhattan Beach Blvd.	CD	0.68	Parking Structure, Retail	13
2a	4170-026-003 4170-026-004	1026 -1030 Manhattan Beach Blvd.	CL	0.49	Remax Offices	9
2b	4163-024-028	1535 Artesia Blvd.	RH	0.46	Masonic Center	9
<b>Total</b>	-	-	-	<b>2.77</b>	-	<b>53</b>

15

CITY OF MANHATTAN BEACH



# Preliminary Lower-Income Capacity Analysis

Category	Lower-Income Units
RHNA	487
Pipeline Residential Development Credited Toward RHNA	9
Underutilized Site Capacity	53
Potential Accessory Dwelling Units	50
<b>Total Net-New-Units</b>	<b>112</b>
<b>Total Capacity Deficit (-)</b>	<b>-375</b>
<b>Capacity Deficit – acreage</b>	<b>18.75</b>

Very-low: 322  
Low: 165

Underutilized sites  
CG Zone: 59 acres  
PD Zone: 21 acres

16

CITY OF MANHATTAN BEACH



# Zoning Map



17

CITY OF MANHATTAN BEACH



# Program Requirements

## *Adequate Sites Program Components*

- i. Permit multifamily uses by right for projects in which 20% or more units are affordable for lower-income households.
- ii. Permit the development of at least 16 units per site.
- iii. Permit a minimum of 20 dwelling units per acre.
- iv. If more than 50% of the lower-income sites are zoned to allow mixed-uses, all lower-income sites designated for MU must:
  - a) Allow 100% residential and
  - b) Require at least 50% of floor area to be residential
  - c) Rezone shall occur within 3 years and 120 days from beginning of planning period (10/15/21)

18

CITY OF MANHATTAN BEACH





# Planning Commission Study Session

Comments received included:

- Explore opportunities along:
  - Aviation Blvd.
  - Manhattan Beach Blvd.
  - Rosecrans Ave.
- Explore allowing duplexes and triplexes in certain single-family neighborhoods
- Explore allowing more ADUs than the State allows
- Concerns with commercial corridors



# Next Steps

Task	Date
Stakeholder Meeting	August 31, 2021
Prepare Draft Housing Element	In Progress
CEQA Analysis – IS/MND	September – December 2021
Planning Commission (PC) Study Session #1	September 15, 2021
City Council (CC) Study Session	TODAY
Optional PC Study Session #2	October 2021
Public Draft Review Period	October 11 – November 25, 2021
Public Hearings	PC: January - February 2022 CC: January - February 2022



# OPEN DISCUSSION AND Q & A

21

CITY OF MANHATTAN BEACH



Thank you!

Additional questions  
or comments?

Email: Talyn Mirzakhania  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)



## 7.2 City Council Meeting 2

The City Council presentation occurred on September 21, 2021. A copy of the PowerPoint used for the presentation is provided as **Exhibit B**. The PowerPoint provided an update on work completed to date, as well as an overview of the Sites Inventory process.

# EXHIBIT C



**DUDEK**



## Manhattan Beach Housing Element Update

STAKEHOLDER MEETING 5:30PM – 7:00PM

AUGUST 31, 2021

1

### Overview

---

<b>01</b> Zoom Overview	<b>04</b> Policy Framework
<b>02</b> Project Overview	<b>05</b> Next Steps
<b>03</b> Barriers to Development	<b>06</b> Interactive Poll & Discussion

2

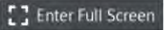
01

# Zoom Overview

3

Before we get started

**Full screen view is recommended for optimal viewing.**

To make the meeting full screen, double-click the meeting window or click the  button in the upper-right corner of the Zoom window.

This meeting is being recorded and will be available on the City's website.

If you have issues using Zoom software please use the **Chat** tool for technical help.

4

4

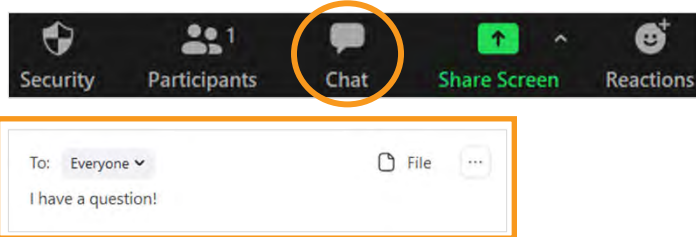
## Before we get started

- Everyone joining the meeting will be “**video off**” and **muted** by default.
- Panelists will be “**video on**” for the duration of the presentation.
- There will be a discussion period at the end of the presentation.
- You may use the **Raise Hand** feature to talk.
- You may use the **Chat** feature throughout the presentation.

STEP 1



STEP 2



5

5

## Before we get started

What is your favorite aspect of living  
in Manhattan Beach?

6

6

# 02

## Project Overview

7

### What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029) required by the State.



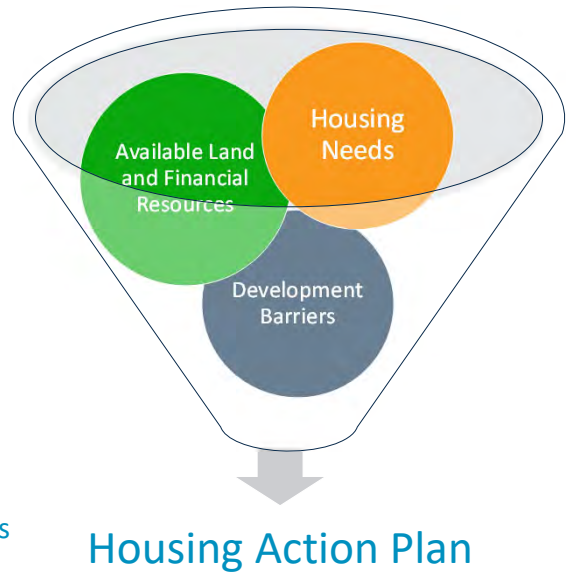
8

8

## What is the purpose of the Housing Element?

- Identify housing needs
- Identify barriers to housing production
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified

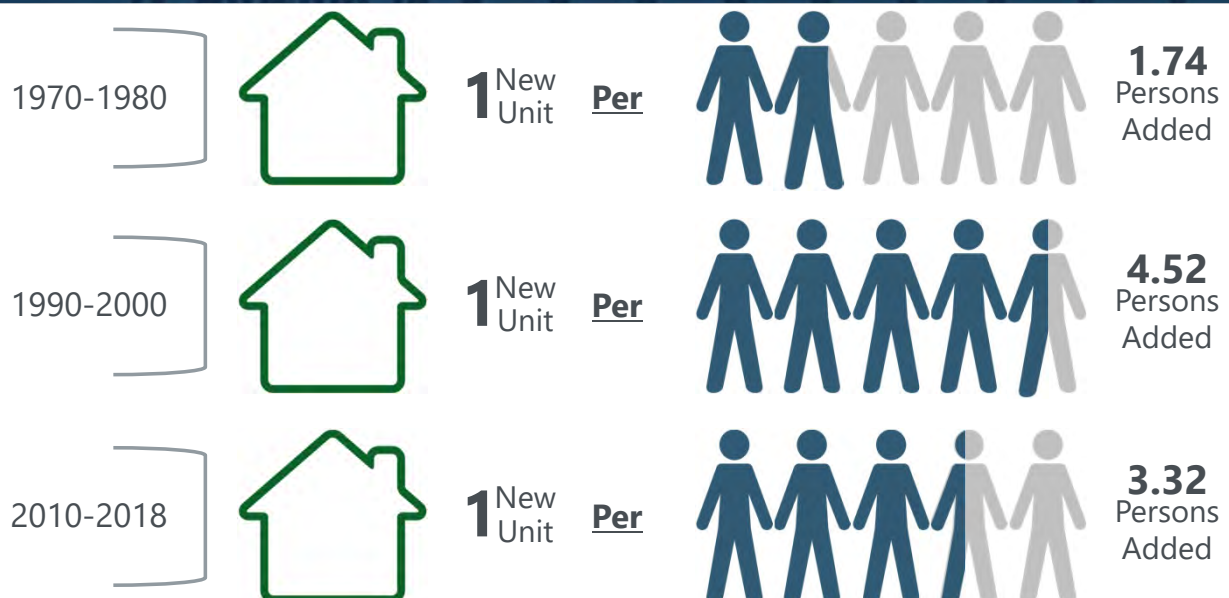
Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.



9

9

## What does the data show?



10

10



## What does the data show?



### Changing Population

- Changing Needs
- Older adults



### Affordability

- Housing Overpayment
- Median Sale Price



### Housing Options

- Housing Supply



11

11

## 2021 Income Limits

### Los Angeles County Area Median Income (AMI): \$80,000\*

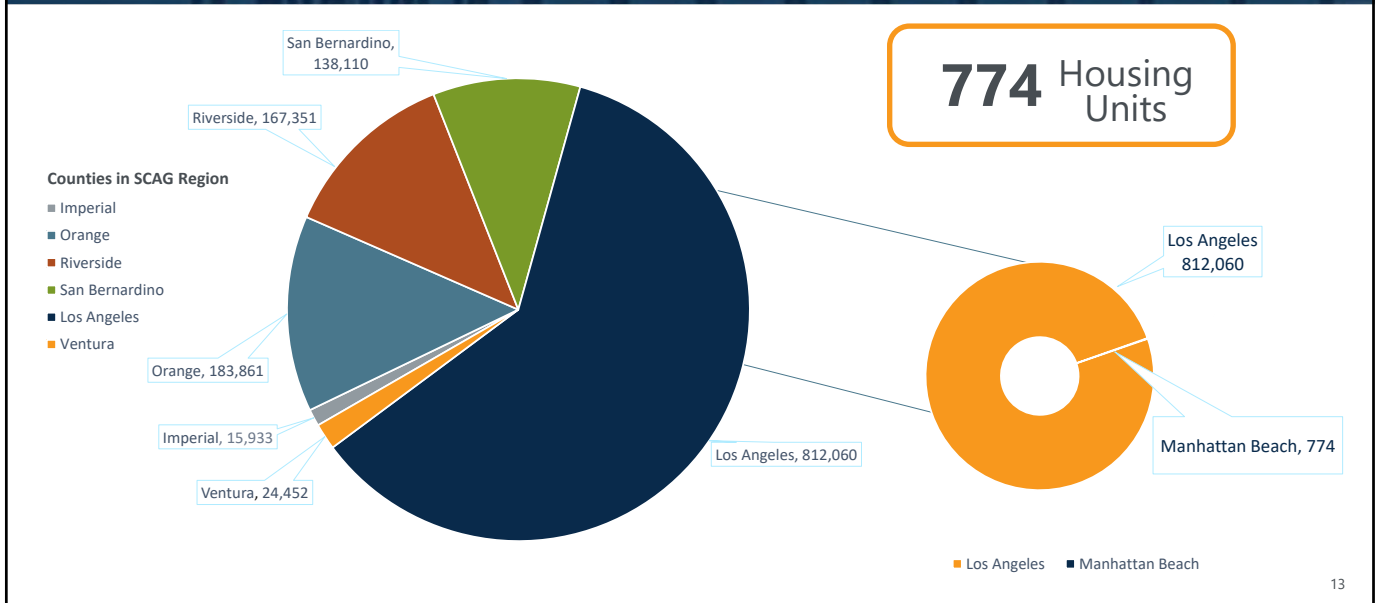
\*This is the AMI for a four-person household.

Income Category	% AMI Range	Income Limit	2021 State Income Limits (Adjusted)
Very Low	<50% AMI	<\$40,000	<\$59,100
Low	50% - 80% AMI	<\$64,000	<\$94,600
Moderate	80% - 120% AMI	<\$96,000	<\$96,000
Above Moderate	>120% AMI	>\$96,000	>\$96,000

12

12

# How many housing units does Manhattan Beach have to plan for?



13

# 5<sup>th</sup> Cycle RHNA Progress Data Reported 2014-2020

**5<sup>th</sup> Cycle Average Units Permitted Per Year = 52**

**6<sup>th</sup> Cycle Average Units Permitted Per Year Needed = 96**

Income Level	4 <sup>th</sup> Cycle (2005-2013) RHNA	5 <sup>th</sup> Cycle (2013-2021) RHNA	6 <sup>th</sup> Cycle (2021-2029) RHNA	Permitted Since 2014
Very-Low	236	10	322	0
Low	149	6	165	0
Moderate	160	7	155	0
Above Moderate	350	15	132	419
<b>Total</b>	<b>895</b>	<b>38</b>	<b>774</b>	<b>419</b>

14

14

## Housing Element Components

Housing Needs Assessment

Fair Housing Analysis

Development Constraints and Barriers

Sites Analysis and Inventory

Goals, Policies, and Programs

15

03

## Barriers to Development

16

## What are the barriers to development?

### Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

### Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

### Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

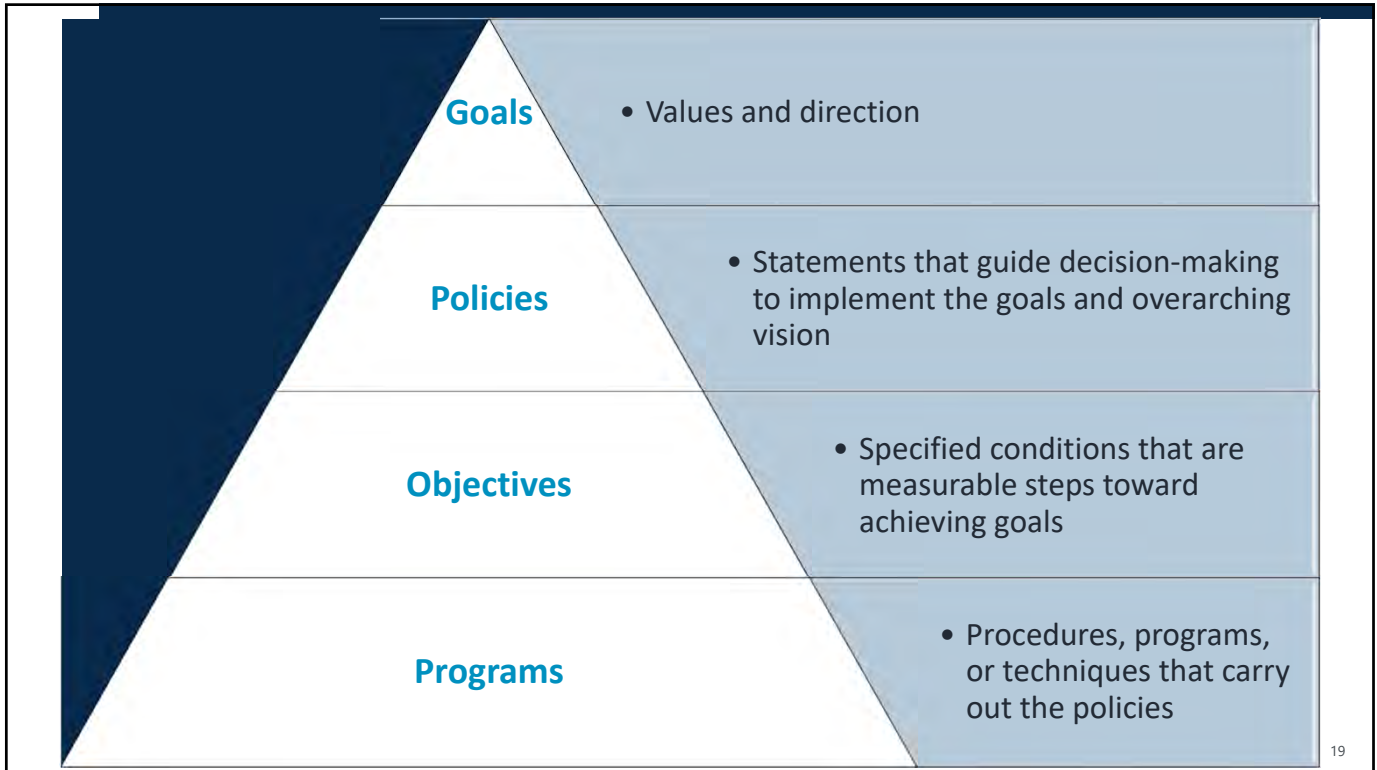
17

17

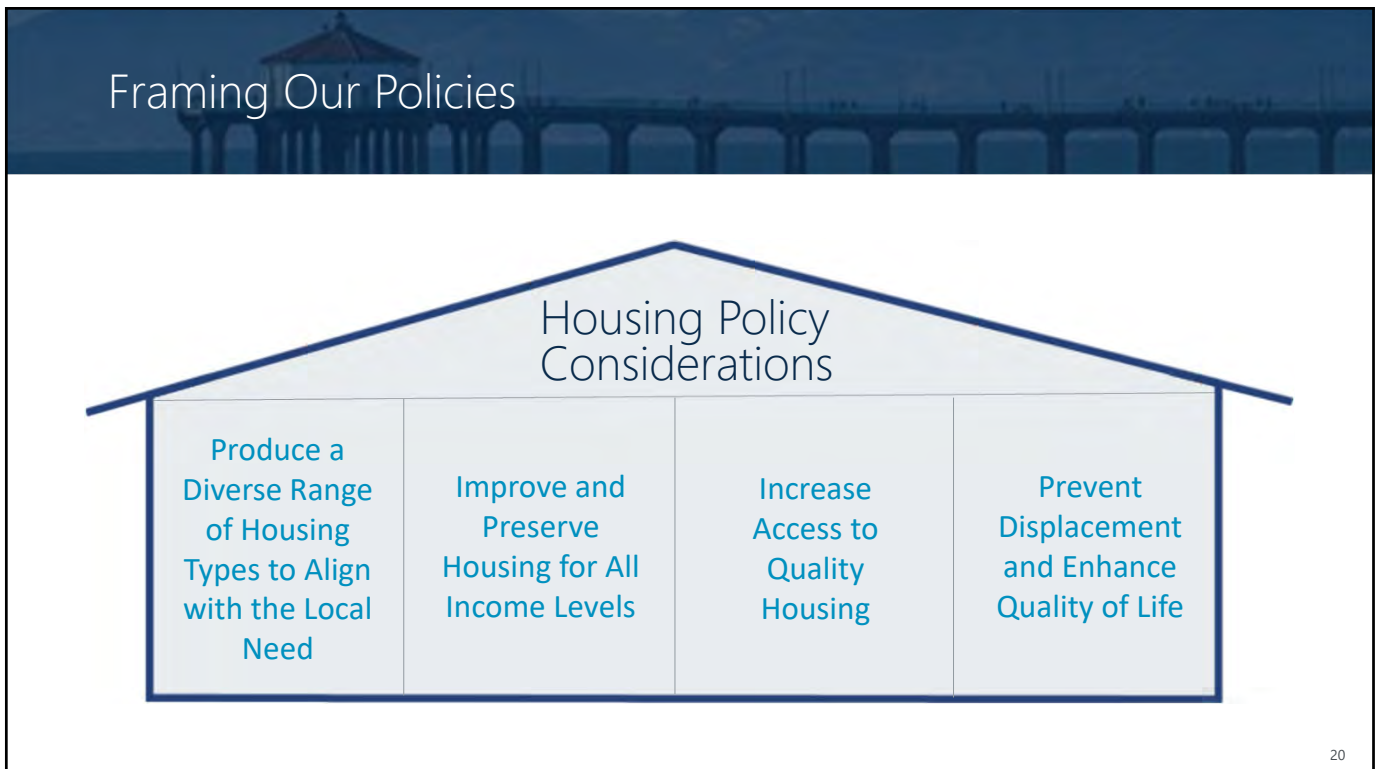
# 04

## Policy Framework

18



19



20

## Policy Examples

- **Policy:** Provide adequate sites to facilitate the development of a diverse range of housing that fulfills its regional housing needs, including low-, moderate- and higher-density single-family attached/detached units and multiple-family units.
- **Policy:** Facilitate the development of housing through the removal of local regulatory constraints, especially for housing that serves lower-income households and those with special needs.
- **Policy:** Implementation practices that prevent displacement and discrimination through enforcement of existing requirements.



21

# 05

## Interactive Poll

22

## Interactive Poll



23

06

## Next Steps

24

## Next Steps

Task	Date
Stakeholder Meeting	Today
Prepare Draft Housing Element	In Progress
Planning Commission (PC) Study Session #1	September 15, 2021
City Council (CC) Study Session	September 21, 2021
Optional PC Study Session #2	October 2021
Public Draft Review Period	October 11 – November 25, 2021
Public Hearings	PC: January - February 2022 CC: January - February 2022

25

25

06

## Open Discussion

26





# Thank you!

Next meeting:  
Planning Commission  
Study Session #1  
Sept. 15th - 3pm

Additional questions  
or comments?

Email: Talyn Mirzakhian  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)

### 7.3 Stakeholder Meeting

A stakeholder meeting was held on August 31, 2021, that allowed interested parties to be engaged in a more formal setting where they learned about the planning process, the components of the Housing Element, and the importance of their role in development of the Housing Element. A copy of the PowerPoint used for the presentation is provided as **Exhibit C**.

# EXHIBIT D

**Poll Report**

Report Generated:

9/1/2021 8:59

Webinar ID

Actual Start Time

Actual Duration (minutes)

Topic

920 6696 8694

8/31/2021 17:10

93

Manhattan Beach Housing Element Stakeholder Meeting

Poll Details					
#	User Name	User Email	Submitted Date/Time	Question	Answer
1	l p	chicrested@hotmail.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Lack of available land
2	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Cost of development (including cost of land);Community support
3	Margaret Bailey	mbailey@chmgov.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Cost of development (including cost of land)
4	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Cost of development (including cost of land);Community support
5	brandon Straus	brandon@esrou.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Lack of available land;Cost of development (including cost of
6	l p	chicrested@hotmail.com	8/31/2021 18:03	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Other (Please provide additional information in the Chat)
7	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase mixed-use opportunities;Increase density (e.g.
8	Margaret Bailey	mbailey@chmgov.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase housing opportunities along commercial corridors
9	Michael Donahue	mdonahue2021@gmail.com	8/31/2021 18:03	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase density (e.g. allow taller buildings with more housing units)
10	Zac Dean	zakdances@gmail.com	8/31/2021 18:03	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase mixed-use opportunities
11	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase housing opportunities along commercial corridors
12	brandon Straus	brandon@esrou.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase housing opportunities along commercial corridors
13	l p	chicrested@hotmail.com	8/31/2021 18:00	What do you feel are unmet housing needs in Manhattan Beach?	I do not feel there are unmet housing needs
14	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 18:00	What do you feel are unmet housing needs in Manhattan Beach?	Diversity in housing stock e.g., duplexes, apartments, granny
15	Margaret Bailey	mbailey@chmgov.com	8/31/2021 18:00	What do you feel are unmet housing needs in Manhattan Beach?	General housing affordability
16	Michael Donahue	mdonahue2021@gmail.com	8/31/2021 18:01	What do you feel are unmet housing needs in Manhattan Beach?	Availability of rental units
17	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 18:01	What do you feel are unmet housing needs in Manhattan Beach?	Diversity in housing stock e.g., duplexes, apartments, granny
18	l p	chicrested@hotmail.com	8/31/2021 17:58	What is your top priority for new housing?	Other (Please provide additional information in the Chat)
19	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 17:58	What is your top priority for new housing?	Affordability
20	Margaret Bailey	mbailey@chmgov.com	8/31/2021 17:58	What is your top priority for new housing?	Other (Please provide additional information in the Chat)
21	Michael Donahue	mdonahue2021@gmail.com	8/31/2021 17:58	What is your top priority for new housing?	Affordability
22	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 17:58	What is your top priority for new housing?	Ownership options

#### 7.4 Interactive Poll Results

The results from the interactive poll conducted during the stakeholder meeting on August 31, 2021, are shown in **Exhibit D**.

## 7.5 Planning Commission Meeting

The Planning Commission presentation occurred on September 15, 2021. A copy of the PowerPoint used for the presentation is provided as **Exhibit E**. The PowerPoint provided a detailed description regarding what a Housing Element entails, and a brief overview of how the City is assigned its Regional Housing Needs Allocation.

# EXHIBIT E

**DUDEK**



## Manhattan Beach Housing Element Update

PLANNING COMMISSION MEETING 3:00PM

SEPTEMBER 15, 2021

### Overview

**01** Project Overview

**04** Sites Analysis

**02** Barriers to Development

**05** Next Steps

**03** Policy Framework

**06** Discussion and Q & A

## What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029) required by the State.



3

## 2021 Income Limits

Los Angeles County Area Median Income (AMI): \$80,000\*

\*This is the AMI for a four-person household.

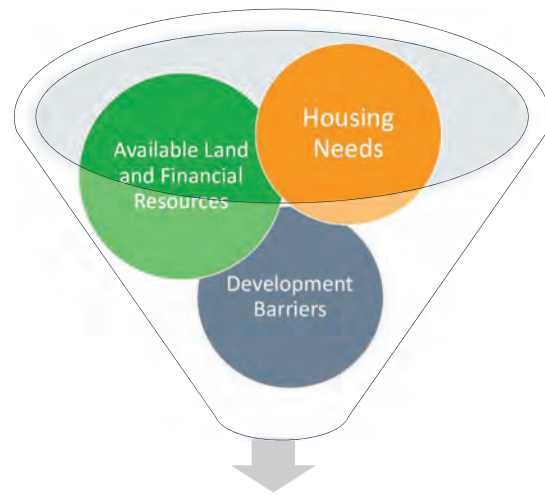
Income Level	% AMI Range	Income Limit	HCD-Adjusted Income Limit
Very Low	<50% AMI	<\$40,000	<\$59,100
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Moderate	80% - 120% AMI	<\$96,000	<\$96,000
Above Moderate	>120% AMI	>\$96,000	>\$96,000

4

## What is the purpose of the Housing Element?

- Identify housing needs
- Identify barriers to housing production
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified

Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.



Housing Action Plan

5

## What does the data show?



### Changing Population

- Changing Needs
- Older adults



### Affordability

- Housing Overpayment
- Median Sale Price



### Housing Options

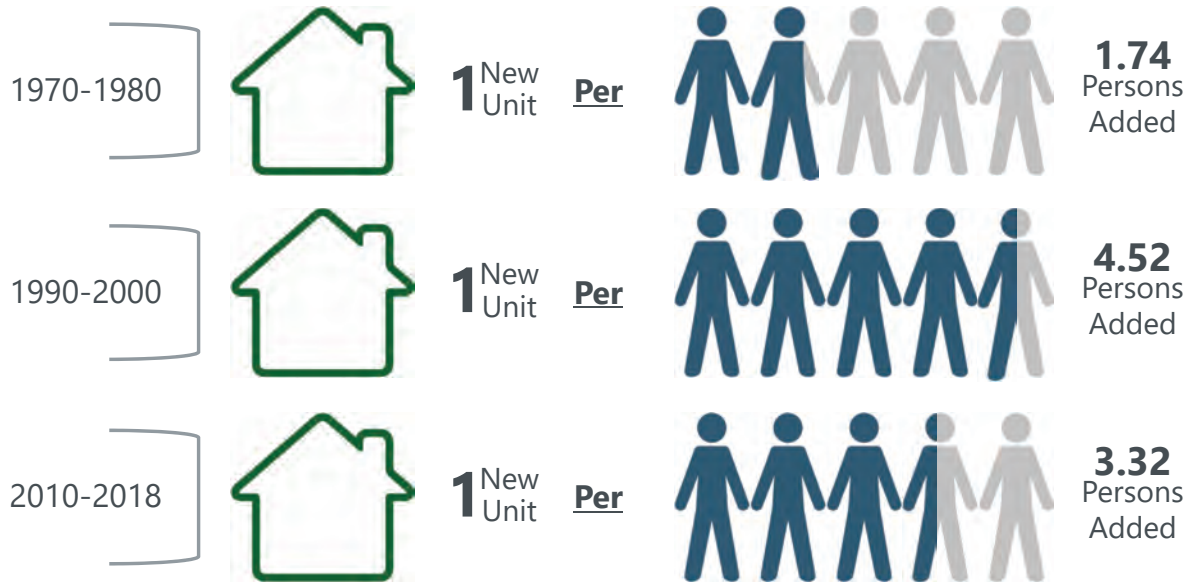
- Housing Supply



6

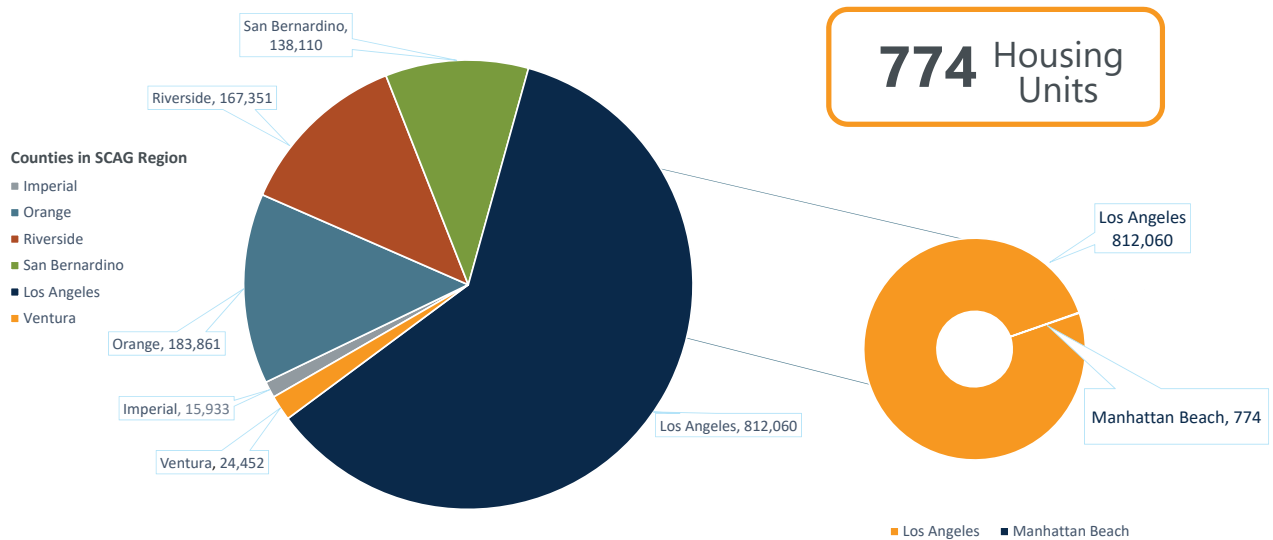


## What does the data show?



7

## How many housing units does Manhattan Beach have to plan for?



8

# 5<sup>th</sup> Cycle RHNA Progress

Data Reported 2014-2020

**5<sup>th</sup> Cycle  
Average  
Units  
Permitted  
Per Year = 52**

**6<sup>th</sup> Cycle  
Average Units  
Permitted Per  
Year Needed  
= 96**

Income Level	4 <sup>th</sup> Cycle (2005-2013) RHNA	5 <sup>th</sup> Cycle (2013-2021) RHNA	6 <sup>th</sup> Cycle (2021-2029) RHNA	Permitted Since 2014
Very-Low	236	10	322	0
Low	149	6	165	0
Moderate	160	7	155	0
Above Moderate	350	15	132	419
<b>Total</b>	<b>895</b>	<b>38</b>	<b>774</b>	<b>419</b>

## Housing Element Components



## What are the barriers to development?

### Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

### Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

### Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

11

## Framing Our Policies

Step 1: Review of 5<sup>th</sup> cycle goals (what to carry forward, what needs modification)

- **Goal 1** - *Preserve existing neighborhoods- carry policies forward with minor modifications*
- **Goal 2** - *Provide a variety of housing opportunities- requires modification and updating*
- **Goal 3** - *Provide a safe and healthy living environment for City residents – carry forward*
- **Goal 4** - *Encourage the conservation of energy in housing – carry forward*

12



## Framing Our Policies

### Step 2: Development of new policies for 6<sup>th</sup> cycle

- **SB 35** - Amend internal procedures and zoning code to include SB 35 streamlining in permitting processes and procedures.
- **AB 1763/SB 2263** - Review and amend its local Density Bonus Program Ordinance to ensure consistency with State requirements.
- **AB 671** - Adopt an ordinance that incentivizes affordable ADUs
- **AB 101** - Amend zoning code to allow low barrier navigation centers
- **AB 1851** - Amend the zoning code to identify a process by which parking requirements can be reduced for religious institutions that would eliminate religious-use parking spaces in exchanged for housing developments

13



## Sites Analysis Requirements

- Adequate Lower-Income Unit Zone
- Has an Improvement-to-Land Ratio (IL Ratio) less than or equal to 1
- Building was built before 1970-1990
- Site is greater than or equal to 0.5 acres
- Realistic Capacity at 20 du/acre  
(*Net Units are greater than or equal to 1*)
- Given that more than 50% of our capacity will be from non-vacant land, sites for the lower income capacity will need to be supported with evidence that the existing use is not an impediment (no sites with large chains/essential uses)

14

# Capacity Identified

Capacity Identified						
Site Key	APNs	Address	Zone	Acres	Uses	Net Units
1a*	4163-008-023 4163-008-024 4163-008-038	Artesia Blvd / Redondo Ave.	CL	0.62	Closed antique shop, single family residential, offices	12
1b*	4137-001-900 4137-001-904 4137-001-905 4137-001-027	Rosecrans Ave / Highland Ave.	CNE	0.52	Parking, Restaurant	10
1c*	4179-005-003 4179-005-004 4179-005-005 4179-005-006 4179-005-007 4179-005-903	Morningside Dr / Manhattan Beach Blvd.	CD	0.68	Parking Structure, Retail	13
2a	4170-026-003 4170-026-004	1026 - 1030 Manhattan Beach Blvd.	CL	0.49	Remax Offices	9
2b	4163-024-028	1535 Artesia Blvd.	RH	0.46	Masonic Center	9
<b>Total</b>	-	-	-	<b>2.77</b>	-	<b>53</b>

15

# Opportunities for Additional Capacity



16

## Capacity Analysis

Category	Lower-Income Units
RHNA	487
Pipeline Residential Development Credited Toward RHNA	9
Underutilized Site Capacity	53
Potential Accessory Dwelling Units	50
<b>Total Net-New-Units</b>	<b>112</b>
<b>Total Capacity Deficit (-)</b>	<b>-375</b>
<b>Capacity Deficit – acreage</b>	<b>18.75</b>

17

## Program Requirements

### *Adequate Sites Program Components*

- i. Permit multifamily uses by right for projects in which 20% or more units are affordable for lower-income households.
- ii. Permit the development of at least 16 units per site.
- iii. Permit a minimum of 20 dwelling units per acre.
- iv. If more than 50% of the lower-income sites are zoned to allow mixed-uses, all lower-income sites designated for MU must:
  - a) Allow 100% residential and
  - b) Require at least 50% of floor area to be residential
  - c) Rezone shall occur within 3 years and 120 days from beginning of planning period (10/15/21)

18

## Next Steps

Task	Date
Stakeholder Meeting	August 31, 2021
Prepare Draft Housing Element	In Progress
CEQA Analysis – IS/MND	September – December 2021
Planning Commission (PC) Study Session #1	Today
City Council (CC) Study Session	September 21, 2021
Optional PC Study Session #2	October 2021
Public Draft Review Period	October 11 – November 25, 2021
Public Hearings	PC: January - February 2022 CC: January - February 2022

19

# OPEN DISCUSSION AND Q & A



# Thank you!

Next meeting:  
City Council  
Study Session  
Sept. 21st - 6pm

Additional questions  
or comments?

Email: Talyn Mirzakhania  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)



## 7.6 Hometown Fair

City staff attended the Hometown Fair on October 2, 2021. A copy of the flier that was distributed at the information booth is provided as **Exhibit F**.

EXHIBIT F

# WE WANT YOUR INPUT!

## 6TH CYCLE HOUSING ELEMENT UPDATE



**The City is updating its Housing Element!\***

**Stay tuned for the release of the Draft Housing Element, which will be available for public review mid-October through the end of November.**

### **STAY INFORMED!**

Sign up on our Housing Element Update Interested Parties list by sending an email to

**[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)**

or view our webpage for updates and information:

**[www.manhattanbeach.gov/6thcycle](http://www.manhattanbeach.gov/6thcycle)**

\*The Housing Element is one of the State-mandated Elements of a General Plan, and it is required to be updated every eight years and certified by the State Department of Housing and Community Development. The Housing Element analyzes community housing needs in terms of affordability, availability, adequacy, and accessibility, and describes the City's strategy and programs to address those needs.



# LETTER 1

---

**From:** Talyn Mirzakhian <tmirzakhian@manhattanbeach.gov> on behalf of HE Update 2021 <HEupdate2021@manhattanbeach.gov>  
**Sent:** Friday, October 22, 2021 11:53 AM  
**To:**  
**Subject:** FW: [EXTERNAL] Public comments incorrect

**From:** Zac Dean <zakdances@gmail.com>  
**Sent:** Wednesday, October 20, 2021 8:46 PM  
**To:** HE Update 2021 <HEupdate2021@manhattanbeach.gov>  
**Subject:** [EXTERNAL] Public comments incorrect

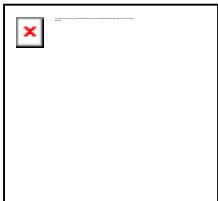
**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hello, MB resident here. Thanks for all your work on the housing element.

Quick clarification: On page F-2 and F-3, there is a section referring to public comments: "A member of the public mentioned that while the City is built-out,"

That member of the public was me. I did say MB is a low density city, but I didn't say MB was "built-out". I said the term "built-out" has no official definition or designation, and the claim that MB is "built-out" is highly subjective and not very convincing, especially considering MB is +70% zoned for single family detached homes which greatly restricts the potential capacity for more homes.

Also, I don't mean to speak for this person, and you can check the transcript, but I think that "Another member of the public voiced concern over parking regulations and traffic impacts resulting from multifamily housing and increased densities." is incorrect as well. That member of the public was expressing concern that the city's excessive parking requirements are inhibiting the development of townhomes. I don't think their comment was implying townhomes have a significant negative effect on parking or traffic.



HE UPDATE 2021

HEupdate2021@manhattanbeach.gov

The City of Manhattan Beach continues to care about your health and safety. The [Citizen Self Service \(CSS\) Online Portal](#) is available for City permit and planning applications and inspections. Most Community Development services are available [online](#) and various divisions can be reached at (310) 802-5500 or [Email](#) during normal City business hours.

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266

[Office Hours](#): M-Th 8:00 AM-5:00 PM | Fridays 8:00 AM-4:00 PM | Not Applicable to Public Safety

[Reach Manhattan Beach](#) Here for you 24/7, use our click and fix it app

Download the mobile app now

# LETTER 2

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**From:** Phillips Lee <leephillipsmd@yahoo.com>  
**Sent:** Thursday, November 18, 2021 5:37 PM  
**To:** HE Update 2021  
**Subject:** [EXTERNAL] 6th Cycle Housing Element Update

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Please provide a rationale for including Goal 3: Provide a safe and healthy living environment for City residents and the policies associated with the goal (pg4)  
Program 10: Energy Conservation and Energy Efficiency Opportunities (page 15)  
program 27: Water Conservation and Green Building Standards (pg31)  
It talks about the city's sustainability program but why is it included in this document?  
Is it required or was it requested to be included by someone?  
Also why would this document suggest that the city go beyond state required energy requirements?  
Also how will increasing the cost of housing increase the housing stock, in fact the rate of new housing will decrease?

Thanks  
Lee

# LETTER 3

**From:** Anne Paulson <anne.paulson@gmail.com>  
**Sent:** Tuesday, November 30, 2021 4:59 PM  
**To:** HE Update 2021  
**Cc:** housingelements@yimbylaw.org  
**Subject:** [EXTERNAL] Manhattan Beach Draft Housing Element: The "Sites" are not sites

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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To whom it may concern:

Manhattan Beach's Housing Element finds that there are inadequate sites for low income housing. It therefore proposes to rezone various "sites" for low income housing, listed on p E-23 to E-26. But these "sites" are not sites; they are collections of parcels with various ownerships. Consider Site 5, listed on p E-23:

FBIHQ 11/30/21, 09:11:19 AM						
5	5	CG	Z	1.15	21	Stand-alone shipping and mailing store with surface parking (APN 4170006019, LTI ratio 0.26, Built 1955) Stand-alone marketing agency (APN 4170006018, LTI ratio 0.06, Built 1950). Duplex with 2 existing residential units (APN 4170006017, LTI ratio 0.22, Built 1949) Two-story commercial building with a sports bar and office spaces with a large surface parking lot (APN 4170006022, LTI ratio 0.39, Built 1954). Stand-alone commercial building with a tailor and insurance agency office with surface parking (APN 4170006015, LTI ratio 0.26, Built 1955) Ingress and egress to surrounding uses (APN 4170006028, LTI ratio N/A). Auto service shop (APN

This is all the parcels on a city block that face Highway One, no fewer than nine parcels, with, presumably, nine different ownerships. There's a duplex, a two story sports bar, a marketing agency, and a veterinarian's office. A potential low income builder would have to obtain rights to all nine of these parcels, parcels with, apparently, ongoing uses, in order to build a meager 21 units. There is no way any builder would think this was feasible, particularly when they would only be allowed to build 21 units on the resulting site.

This is just one example of many. Site 2 has eight parcels. Site 3 has 7 parcels. Site 9 has 5 parcels.

Manhattan Beach needs to supply substantial evidence to support the idea that these parcels could be feasibly be consolidated. If there is no such evidence, these "sites" need to be replaced with sites that would be feasible.

Sincerely,

Anne Paulson

# LETTER 4

**From:** Zac Dean <zakdances@gmail.com>  
**Sent:** Tuesday, November 30, 2021 11:50 PM  
**To:** HE Update 2021  
**Subject:** [EXTERNAL] Housing Element comment: Current draft not in compliance with AFFH and other issues

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Hello, I'm a Manhattan Beach resident.

I appreciate all the hard work that went into the housing element draft so far, including navigating the many requirements from state agencies. I think we all want a swift and efficient approval from HCD. That being said, I have some comments on aspects which are keeping this draft from compliance and risk HCD rejection:

First, an excerpt from the AFFH memo:

“Affirm” Affirmatively  
furthering  
fair  
housing” means  
taking

meaningful  
actions,  
in  
addition  
to

combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

Specifically, affirmatively furthering fair housing means taking meaningful actions that, take

n together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency’s activities and programs relating to housing

and community development. atively furthering fair housing”

means taking meaningful actions, in addition to

combating disc

**1) Focusing almost entirely on mixed-use development with little history or evidence of significant results.**

Similar to most other South Bay cities, MB is apparently focusing mostly on encouraging mixed-use development to satisfy RHNA requirements. The problem though, is that Manhattan Beach has made similar changes in the past (as noted in the draft) yet has permitted few mixed-use residential developments, and an even smaller subset of those have actually been built. **Please**

**include real world evidence in the draft that demonstrates how these further changes will result in a significantly increased likelihood of mixed-use development.** This evidence should include the times and places that the city made contact with local developers to get their input on what would make such development viable.

**2) MBMC Section 10.12.030 (city-wide election requirement) is not a valid reason to be out of compliance with AFFH. In fact, that covenant is itself a violation of AFFH.**

As stated in the AFFH memo, *a fair housing issue is a condition in a geographic area of analysis that restricts fair housing choice or access to opportunity.* The statute mentioned on page 36 **is precisely that kind of condition.** There needs to be a plan included in the housing element to amend those kinds of "rules", it shouldn't be used as an excuse to avoid further changes. It's also unclear what "preserve residential neighborhoods" mean exactly. Preserving from what?

**3) No effort has been made to integrate any single family neighborhood, including the racially concentrated areas of affluence.**

As noted in the draft, Manhattan Beach has staggering levels of both racial and class-based segregation. At the same time, the percentage of single family zoning is high even for the South Bay region. I'm not sure how you can acknowledge this reality in the draft yet do absolutely nothing to address it. These kinds of land use policies, which dominate MB, contribute significantly to the cost of housing by constraining supply.

**4) No protection against air pollution and noise pollution along PCH/Sepulveda and Manhattan Blvd.**

Only allowing multifamily residences along high traffic corridors is not a practice that should continue for obvious reasons. Manhattan Beach's own city planning guide recognizes the disruption caused by air/noise pollution, and has attempted to ameliorate in the past with physical infrastructure (The Oak Avenue Overlay District). Single family homeowners should not have exclusive access to fresh air. This should be addressed in the draft.

In conclusion, this draft is well-meaning and better in many ways than the drafts of other South Bay cities (looking at you, Hermosa and Redondo). But in its current state, it's obviously attempting to take the path of least resistance by avoiding any changes to the 77% of the city which is composed of highly exclusionary and segregated neighborhoods. There's so many unaddressed issues (reforming the city-wide election requirement, etc). Until a serious attempt is made to address those, I feel it's inadequate and risks being rejected by HCD.

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# CITY OF MANHATTAN BEACH

## 6TH CYCLE HOUSING ELEMENT (2021-2029)

DRAFT FOR ADOPTION—JANUARY 2022



**DUDEK**

38 North Marengo Avenue  
Pasadena, CA 91101  
626.204.9800 | [dudek.com](http://dudek.com)

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# Housing Element

## 1 Introduction

The Housing Element of the General Plan addresses the comprehensive housing needs in Manhattan Beach for the 8-year planning period (2021–2029). It provides an analysis of the local housing needs for all income levels, details barriers to providing needed housing, and identifies a set of strategies for meeting the housing need within the planning period. Housing Elements are one of seven required components of a General Plan and are guided by State law, which requires local governments to update their Housing Elements every 8 years. This is the 6th update to the City of Manhattan Beach (City) Housing Element (6th Cycle).

The Housing Element is a strategic vision and policy guide designed to help address the comprehensive housing needs of the City over an 8-year period (2021–2029 planning period). It defines the City’s housing needs, identifies the barriers or constraints to providing needed housing, and provides policies to address these housing needs and constraints.

Recent amendments to housing and planning laws aim to address California’s housing shortage, placing a substantial number of new requirements for the 6th Cycle Housing Element. Housing in California has become some of the most expensive in the nation, ranking 49th out of 50 states in homeownership rates and the supply of housing per capita. Only one-half of California’s households are able to afford the cost of housing in their local regions.<sup>1</sup> Every county and city across the State is required by law to adequately plan for their fair share of needed housing.

The City must adequately plan for its existing and projected housing needs, including its share of the Regional Housing Needs Allocation (RHNA), as identified by the State with input from the Southern California Association of Governments and local cities and counties. Although the City is not required to build housing, the State requires each local government to demonstrate where housing can reasonably be expected to be added within this cycle and how the City will facilitate and incentivize its production. As identified by the 6th Cycle RHNA, the City must plan for 774 housing units, which are further broken down by income level.

The City’s 6th Cycle RHNA targets are broken down by income level, as follows:

- Extremely Low-Income = 161 units
- Very Low-Income = 161 units
- Low-Income = 165 units
- Moderate-Income = 155 units

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<sup>1</sup> Government Code Section 65589.5(2)(E)

## 2 Housing Element Organization

The Housing Element identifies goals, policies, and programs to comprehensively address the housing needs of all current and anticipated residents at all income levels over the upcoming housing period of 2021 through 2029. The Housing Element is divided into chapters, and supporting documentation is included as appendices of the Housing Element.

### Housing Element Content

- **Introduction** provides an overview of the Housing Element, its relationship to State law, the City's RHNA, and the Housing Element's organization.
- **Public Engagement** describes the outreach process that was undertaken through the Housing Element update process, and the input received that informed the development of this Housing Element.
- **General Plan Consistency** details those policies identified throughout the elements of the General Plan that guided the policies set forth in the Housing Element to ensure that consistency is maintained throughout the General Plan.
- **Goals and Policies** specifies the City's plans for meeting the existing and projected comprehensive housing needs of Manhattan Beach.
- **Program Implementation** identifies the specific actions that will be implemented to ensure that Manhattan Beach's housing needs are met within the planning period.

### Appendices

- **Appendix A - 5th Cycle Review** evaluates the efficacy of the 5th Cycle Housing Element; the progress in Housing Element implementation; and the appropriateness of the goals, policies, and programs.
- **Appendix B – Needs Assessment** provides a community profile assessing the housing need through detailed information on Manhattan Beach's demographic characteristics and trends that influence supply and demand of various housing types.
- **Appendix C - Constraints and Zoning Analysis** details governmental and non-governmental constraints to the maintenance, improvement, and development of housing for all income levels.
- **Appendix D - Affirmatively Further Fair Housing Analysis** identifies disproportionate housing needs, including segregated living patterns, concentrated areas of poverty, disparities in access to opportunity, and displacement risk.
- **Appendix E - Sites Analysis and Inventory** describes the methodology by which the City can accommodate its RHNA targets, and provides an inventory of the sites identified to meet the housing need.
- **Appendix F - Community Engagement Summary** provides the detailed results of the outreach conducted for the update to the Housing Element.

### 3 Public Engagement

The City conducted a robust public outreach program that engaged a broad spectrum of the community and stakeholders. Stay-at-home orders of 2021 provided the City with opportunities to explore new avenues for public engagement and increased access for those who are traditionally not involved in the planning process. Outreach and formal engagement activities were held across a variety of platforms, including a virtual stakeholder and community workshop, interactive poll, public review period, and study sessions and public hearings.

The outreach conducted for the update to the Housing Element engaged a broad range of community members and stakeholders alike, including, but not limited to, public policy advocates, the South Bay Association of Realtors, and residents. The City cast a wide net to gain participation from all segments of Manhattan Beach's interested parties. The extensive outreach process conducted for this Housing Element update contributed to a set of meaningful goals, policies, and programs that reflect Manhattan Beach's housing needs and the priorities and needs of all of those in Manhattan Beach, including those with special needs and lower-income populations. **Appendix F, Community Engagement Summary**, provides a comprehensive summary detailing the outreach conducted as part of the update to the Housing Element and corresponding materials.

## 4 General Plan Consistency

The California Government Code requires that a General Plan prepared by a local government contain an integrated, internally consistent set of goals, policies, and programs. The structure of this Housing Element is built on the same foundation that all other elements of the General Plan were formed. In addition, the Housing Element goals complement those found in the other elements of the General Plan. Cohesive housing policies that are appropriate to Manhattan Beach were designed through this coordination.

The City of Manhattan Beach will maintain consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with all elements of the General Plan. Under State law, the General Plan requires an annual review and report to examine amendments and implementation status. In line with the other General Plan elements, the goals of the Housing Element aim to do the following:

- Meet existing housing needs
- Plan for future growth
- Protect and enhance Manhattan Beach's neighborhoods
- Provide new housing opportunities and equal opportunities

## 5 Goals and Policies

### **Goal 1: A preserved and enhanced housing stock within high-quality neighborhoods that aligns with the needs of all current and future Manhattan Beach households.**

Policy 1.1: Preserve the scale of development in existing residential neighborhoods.

Policy 1.2: Facilitate the development of housing through the removal of local regulatory constraints, especially for housing that serves lower-income households and those with special needs.

Policy 1.3: Conserve existing dwelling units.

Policy 1.4: Preserve the existing affordable housing stock.

### **Goal 2: An adequate supply of sites and resources appropriate for accommodating a diverse range of housing types for all income levels.**

Policy 2.1: Provide adequate sites for new housing consistent with the Regional Housing Needs Allocation and the capacity of roadways, sewer lines, and other infrastructure to handle increased growth.

Policy 2.2: Encourage the development of additional low- and moderate-income housing.

Policy 2.3: Support increased accessibility to existing affordable housing stock.

Policy 2.4: Provide regulatory incentives and increased flexibility in the development approval process to encourage and facilitate the development of affordable single-family, multifamily, and mixed-use housing.

### **Goal 3: Provide a safe and healthy living environment for City residents.**

Policy 3.1: Eliminate potentially unsafe or unhealthy conditions in existing residential development.

Policy 3.2: Encourage the use of alternate energy and resource efficiency.

Policy 3.3: Reduce energy loss due to inferior construction/development techniques.

Policy 3.4: Encourage reduction in energy consumption for commuting to work and other activities.

**Goal 4: Equal opportunities for all residents to reside in the housing of their choice.**

Policy 4.1: Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color, and for special needs groups.

Policy 4.2: Encourage development of accessible housing for all levels of ability through regulatory relief.

Policy 4.3: Prohibit housing discrimination and other related discriminatory actions in all aspects affecting the sale and rental of housing based on race, religion, or other protected classifications.



## 6 Program Implementation

### *Program 1: Accessory Dwelling Units-Program*

Accessory dwelling units (ADUs) help meet the City's housing needs for all income levels and provide a housing resource for older adults, students, and [extremely low-, very low-, low- and moderate-income households](#). After passage of new State ADU laws effective January 1, 2017, and January 1, 2020, the City applied State standards in evaluating ministerial applications for ADUs and has adopted ordinances consistent with State law. The City will continue to apply regulations from Chapter 10 of the City's Municipal Code, known as the Planning and Zoning Ordinance (Zoning Code), that allow accessory units by right in all residential or mixed-use zoning districts (zones) in accordance with State law.

From 2017 to 2019, three ADUs were permitted and constructed in the City. However, an Interim ADU Ordinance was in place through 2020 to implement the updated State laws, and in January 2021, the City Council adopted the City's current ADU and junior accessory dwelling unit (JADU) ordinance. Relaxed regulations for ADUs and JADUs dramatically increased their production beginning in 2020. Between January 1, 2020, and September 2021, the City's ADU Ordinance resulted in 11 ADUs permitted, and an additional 22 ADU permit applications are currently under City review.

The City's current ADU Ordinance's associated Local Coastal Program (LCP) amendments are currently under review by the California Coastal Commission. The City will continue to work with and encourage the California Coastal Commission to approve recommended edits for final certification. Once the LCP amendments are certified, the City shall submit its ADU Ordinance to the California Department of Housing and Community Development (HCD) for review. The City's current ADU Ordinance contains provisions that go beyond those set forth in State law, and include the following:

- Consistent with State law, the City permits one ADU and one JADU. Alternatively, to offer more flexibility, the City permits two ADUs on a lot with a proposed or existing single-family dwelling.<sup>2</sup>
- The City permits ADUs for existing multifamily dwelling units, consistent with State law. In addition, the City permits one ADU on a lot with a newly constructed multifamily development.<sup>3</sup>

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of ADUs and JADUs to be developed within the RHNA projection period. The full analysis in Appendix E, Sites Analysis and Inventory, used the trends in ADU construction since January 2018 to estimate new production; however, this only accounts for the effect of new laws without taking into account the local program the City will adopt to incentivize and promote the creation of

<sup>2</sup> ADUs on Lots with a Single-Family Residence. A maximum of two total ADUs shall be allowed on a lot with a proposed or existing single-family dwelling within all Area Districts; however, only one ADU shall be allowed on a property that also has a JADU. Only one detached ADU is allowed on a property (Manhattan Beach Municipal Code Section 10.74.040).

<sup>3</sup> ADUs on Lots with New Multi-Family Developments. In all Area Districts, one ADU shall be allowed on a lot with a newly constructed multi-family development (Manhattan Beach Municipal Code Section 10.74.040).

ADUs, and the recent ADU Ordinance adopted in January 2021. Based on the local incentives, ADU and JADU trends since January 2018, recent sharp upward trends in 2021, and permits currently under City review, a conservative estimate of the number of units to be produced under this approach is an average of 10 ADUs each year during the projection period (see Appendix E for the full Accessory Dwelling Unit Projection analysis).

The Community Development Department reviews and approves ADU entitlements and tracks the timely review of ADU applications and building permits issued. The Community Development Department collects data annually on planning entitlements and building permits for ADUs for the Housing Element Annual Progress Report, and will continue to do so per the ADU projection assumptions in the Sites Inventory (see Program 19, No Net Loss, for objectives and timelines tied to ADU monitoring).

Under Assembly Bill (AB) 671 (2019), local agencies must include a plan in their Housing Element to incentive and promote the creation of ADUs that can be offered at affordable rent for very low-, low-, or moderate-income households. As such, a primary objective of this Accessory Dwelling Unit Program is to promote the development of housing units for lower-income persons or households. To comply with AB 671 and support the goal of permitting an average of 10 ADUs annually, including ADUs affordable to extremely low-, very low-, low-, and moderate-income households, the Community Development Department will develop tools to streamline the approval process and market ADU construction. These public engagement and information tools may include information packets on the entitlement process, a dedicated web page including a step-by-step guide of the entitlement process, preparation of Frequently Asked Questions (FAQs) for distribution at the planning counter or community meetings, and other engagement tools.

As part of Program 19, No Net Loss, the City will review the ADU trends to date at the planning cycle mid-point (by November 2025), and determine if the City is on track to achieve the annual average goal of 10 building permits issued for ADUs. If the City is not on track and there is not an appropriate buffer of sites to make up for the difference as fully explained in Program 19, the Community Development Department will further review and develop additional incentives and review and reallocate existing staffing resources as needed to achieve its goal. Additional incentives may include direct outreach mailings to property owners, technical assistance, and financial assistance.

~~As a method to incentivize and promote the creation of ADUs that can be offered at an affordable rent for very low-, low-, or moderate-income households, the City will develop a process to incentivize the production of JADUs and ADUs affordable to lower-income households. Once developed, City staff will take a proactive role in advancing this policy to existing property owners through information outreach during the development process. The City will further identify opportunities to facilitate the production of ADUs and JADUs (AB 671).~~

<b>Objectives</b>	<ul style="list-style-type: none"><li>• Coordinate with the California Coastal Commission for the current ADU Ordinance’s associated LCP Amendments. Following final certification of LCP amendments, submit the ADU Ordinance to HCD for review.</li></ul>
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	<ul style="list-style-type: none"> <li>• Amend the ADU Ordinance if needed to conform to future amendments to State law and submit to HCD. Process LCP Amendments as required.</li> <li>• <del>Survey and evaluate a variety of potential methods and strategies to encourage ADU development affordable to lower- and moderate-income households.</del></li> <li>• <u>Develop public engagement and informational tools to streamline the approval process and market ADU/JADU construction, including ADUs affordable to lower- and moderate-income households, to achieve an annual average goal of 10 building permits issued for ADUs. These tools may include information packets on the entitlement process, a dedicated web page including a step-by-step guide of the entitlement process, preparation of Frequently Asked Questions (FAQs) for distribution at the planning counter or community meetings, and other engagement tools.</u></li> <li>• <u>Based on the results of the planning cycle mid-point review of ADU trends to be completed as part of <b>Program 19, No Net Loss</b>, review and develop additional incentives to encourage ADU/JADU development if needed. Additional incentives may include outreach to property owners, technical assistance, and financial assistance.</u></li> <li>• <del>Adopt appropriate procedures, policies, and regulatory provisions for the incentivization of affordable ADUs.</del></li> <li>• Issue building permits for an average of 10 ADUs annually.</li> </ul>
<p><b>Timeframe</b></p>	<ul style="list-style-type: none"> <li>• Submit ADU Ordinance and future amendments to HCD for review within 60 days of final certification of associated ADU amendments to the LCP by the California Coastal Commission.</li> <li>• Annual monitoring of ADU programs.</li> <li>• <u>Develop public engagement and informational tools for ADU/JADUs incentive program by January 2024. Propose an ADU/JADU affordable incentive program to City Council and adopt program within 2 years of Housing Element adoption.</u></li> <li>• <u>Based on the planning cycle mid-point review to be completed by November 2025 as part of <b>Program 19, No Net Loss</b>, adopt additional incentives to encourage ADU/JADU development by June 2026.</u></li> <li>• Ongoing tracking of ADU permits issued <u>throughout the planning period and reported annually.</u></li> </ul>

<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 4.1
<b>Relevant Programs</b>	<u>Program 19: No Net Loss</u>

*Program 2: Adequate Sites*

As fully analyzed in **Appendix E, Sites Analysis and Inventory**, the City has a remaining lower-income RHNA of 402-406 units for the 6th Cycle planning period. The City will establish an overlay district that encompasses a minimum of 20.34 acres of sites selected from Table 15, Potential Underutilized Sites for Overlay, of Appendix E, Sites Analysis and Inventory, in the General Commercial (CG) and Planned Development (PD) Districts to accommodate the remaining lower-income RHNA of 402-406 units. The acreage needed is assumed using a realistic capacity of 20 dwelling units per acre, based on the minimum density requirements outlined below.

Pursuant to State law, the overlay district’s standards adopted as part of the Adequate Sites Program to address the RHNA shortfall must will adhere to the following components of Government Code sections 65583.2 (h) and (i):

- Sites must accommodate 100 percent of the shortfall for very low- and low-income units.
- Sites must allow a minimum of 16 units per site.
- Sites must permit a minimum of 20 dwelling units per acre.
- Sites must allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.
- Sites must permit owner-occupied and rental multifamily uses by right pursuant to Government Code Section 65583.2(i)<sup>4</sup> for developments in which 20 percent or more of the units are affordable to lower-income households.

The allowable densities for residential redevelopment in the overlay district will range from a minimum density of 20 dwelling units per acre, consistent with State law, to a maximum density of at least 30 dwelling units per acre. The City will ensure that the development standards that result from the planning process will be carefully crafted such that they will not prevent or prohibit the provision to facilitate development at the maximum densities allowed under the overlay. Any residential development standards in the overlay district will not preclude the minimum densities or requirements of State law outlined above, creating the opportunity for several hundred residential units on sites that previously only permitted commercial uses. As reflected in **Appendix E**, each site identified as a potential site for the Adequate Sites Program’s

<sup>4</sup>. With the definition in Government Code Section 65583.2 (i), “by right” shall mean that the local government’s review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a “project” for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code.

overlay has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.

In addition, the City commits to rezoning an additional 3.65 acres of sites to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. The City will ensure that the sites are rezoned at densities deemed appropriate to accommodate housing for lower-income households as defined by Government Code Section 65583.2(c)(3)(B). This will provide a buffer of at least 73 units of multifamily housing (see Appendix E, Sites Analysis and Inventory, for a full discussion related to rezoning to create a buffer).

<b>Objective</b>	<ul style="list-style-type: none"> <li>Establish overlay district <u>adhering to the standards set forth in Government Code sections 65583.2 (h) and (i)</u> to address shortfall and create opportunity for at least <u>402-406</u> units of multifamily housing for lower-income households.</li> <li><u>Rezone to provide a buffer of at least 73 units of multifamily housing for lower-income households, above and beyond the capacity required for lower-income sites.</u></li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li><u>Pursuant to the requirements as set forth in AB 1398 (2021), the City will Rezone- by February 2025 within 3 years and 120 days from the beginning of the planning period<sup>5</sup>, to accommodate the lower-income shortfall of 406 units.</u></li> <li><u>Rezone by February 2025 to accommodate the lower-income buffer of 73 units.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 4.1

### *Program 3: Affordable Housing Streamlining*

The City currently allows ~~and encourages~~ concurrent processing of all discretionary applications for a project, thereby streamlining the development process. The City will continue to offer ~~and encourage~~ concurrent processing of all discretionary applications for a project and inform developers of the opportunity for concurrent processing.

As detailed in **Programs 8-11 and 185**, the City has a streamlining process in place specifically for multifamily housing in residential zones. Multifamily housing developments in residential zones (Medium-Density Residential District [RM], High-Density Residential District [RH], and Residential Planned Development District [RPD]) with fewer than six units are permitted by-right. Projects

<sup>5</sup> For a local government that fails to adopt a housing element within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, the rezone, shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.

with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan approved by the Director.

To minimize constraints to the development of affordable housing that may result from discretionary permitting procedures, the City will ~~evaluate and~~ amend Chapter 10.84 (Use Permits, Variances, Minor Exceptions, Precise Development Plans and Site Development Permits) of the Zoning Code ~~as needed~~ to ensure Precise Development Plan applications are subject only to an administrative non-discretionary approval process.

Through the removal of discretionary requirements, multifamily developments in the mixed-use zones will also be eligible for streamlined processing ([see Program 15-18 for full program details, including objectives and timelines, related to the removal of discretionary requirements and streamlined processing for multifamily housing in the CL, CD, and CNE zones](#)).

To further assist in the development of housing for extremely low-, very low-, low-, and moderate-income households, the City provides an affordable housing streamlined approval process in accordance with State requirements for qualifying development proposals that provide affordable units under Senate Bill (SB) 35 streamlining.<sup>6</sup> The City annually reports on affordable housing streamlining applications in the Housing Element Annual Progress Report. The City will revise internal permitting procedures to ensure that staff has clear procedures for responding to proposals for SB 35 streamlining and for prioritizing qualifying SB 35 housing developments consistent with State law.

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>• Continue to offer <del>and encourage</del> concurrent processing of all discretionary applications for a project.</li> <li>• <u><a href="#">Amend Zoning Code to ensure a non-discretionary approval process for Precise Development Plan applications.</a></u></li> <li>• Process proposals for SB 35 permit streamlining consistent with State law.</li> <li>• Develop internal staff procedures to assist staff in responding to SB 35 proposals and permit streamlining.</li> </ul>
<p><b>Timeframe</b></p>	<ul style="list-style-type: none"> <li>• Ongoing concurrent processing of all discretionary applications for a project throughout the Housing Element planning period.</li> <li>• <u><a href="#">Amend the Zoning Code to ensure a non-discretionary approval process for Precise Development Plan applications and related LCP Amendments by August 2023.</a></u></li> <li>• Ongoing SB 35 processing throughout the Housing Element planning period <u><a href="#">and report annually.</a></u></li> </ul>

<sup>6</sup> Under Government Code Section 65913.4 (commonly referred to as “SB 35”), multifamily housing developments that satisfy objective planning standards—among other requirements—may be approved through a streamlined, ministerial approval process in certain jurisdictions, including the City of Manhattan Beach. Developments approved through the streamlined approval process are not subject to a Conditional Use Permit or to the California Environmental Quality Act (CEQA).

	<ul style="list-style-type: none"> <li>Develop staff assistance materials <del>by January 2023</del> <u>within 1 year of Housing Element adoption.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.2, 2.3, 2.4, 4.2
<b>Relevant Programs</b>	<u>Program 11: Density Bonus</u> <u>Program 18: Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts</u>

**Program 4: Affordable Senior Housing Preservation**

The Manhattan Village Senior Villas, located at 1300 Park View Avenue, was first occupied in 1997. This project consists of 104 senior housing apartments. As a condition of the project’s approval, and as part of a settlement agreement upon sale of the property, 20 percent of the units must be reserved for very low-income households, 20 percent must be reserved for low-income households, and 40 percent of the units must be reserved for moderate-income households in perpetuity. The remaining 20 percent of the units may be rented at market rate. The occupants of the senior housing project must consist of a householder 62 years of age or older, or 55 years of age or older for persons with disabilities, according to criteria established by the Americans With Disabilities Act (ADA) of 1990 or the Federal Rehabilitation Act of 1973. This program is concerned with ensuring that the current affordability of the project is being maintained.

Although the project’s affordability agreement with the City does not expire, and the components of affordability are preserved via a deed restriction that runs with the land, the City should make contact with the owners of the Manhattan Village Senior Villas and continue to monitor and enforce affordability throughout the planning period. In addition, the City should identify qualified affordable housing developers and local non-profits as potential purchasers/managers of affordable housing units as a proactive measure.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Contact and meet with property owners of project.</li> <li>Monitor affordability throughout the planning period.</li> <li>Create and maintain list of non-profit organizations as potential purchasers/managers of affordable housing units.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Contact and meet with property owners of project by January 2023 and again mid-cycle <del>in 2025</del> <u>by January 2026.</u></li> <li>Biannually update list of non-profit and affordable housing developers <u>starting January 2023.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund

<b>Relevant Policies</b>	1.3, 1.4, 2.3, 4.1
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**Program 5: Americans with Disabilities Act (ADA) Improvements Program**

The Community Development Block Grant (CDBG) Program provides for the development of viable urban communities by providing decent housing, a suitable living environment, and expanded economic opportunities primarily for lower- and moderate-income residents, as well as older adults and people with disabilities. Eligible activities under the CDBG Program include activities related to housing, other real property activities (code enforcement, historic preservation), public facilities, activities related to public services, activities related to economic development, and assistance with community-based development organizations. CDBG funds may be used for the acquisition, construction, reconstruction, rehabilitation, or installation of certain public improvements or public facilities.

Since 2016, the City has used its annual CDBG allocation for infrastructure improvements, specifically installation of ADA-compliant curb ramps throughout City intersections. Most recently (as of Fiscal Year 2018), CDBG funds were allocated to the implementation of the Manhattan Senior Villas ADA Pathway Project. These efforts supported the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, curb ramp, and gutter to create unobstructed paths of travel and accessibility for older adults and residents with disabilities to Manhattan Senior Villas, located at 1300 Parkview Avenue. Construction is anticipated to begin this year (2021). The City will ensure that the Manhattan Senior Villas ADA Pathway Project is completed by 2023 to increase accessibility for older adults and people with disabilities in the City. Following completion of the Senior Villas ADA Pathway Project, the City will use future CDBG funds for additional ADA improvements focused on bringing existing, non-compliant ramps into ADA compliance at various locations throughout the City, as identified by the Public Works Department. These improvements will increase accessibility for people with disabilities throughout the City.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Complete ADA-compliant infrastructure improvements as part of the Manhattan Senior Villas ADA Pathway Project.</li> <li>• Construct ADA-compliant concrete access ramps at various locations throughout the City, contingent upon future CDBG funding.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Complete Manhattan Senior Villas ADA Pathway Project infrastructure improvements by <u>January 2023</u>.</li> <li>• Annual allocation of CDBG funding to ADA-compliant improvements <u>during the planning period</u>, as funding is available.</li> </ul>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>• Public Works Department</li> <li>• Community Development Department</li> </ul>



<b>Funding Sources</b>	CDBG Funds
<b>Relevant Policies</b>	2.3, 3.1, 4.1, 4.3

*Program 6: Annual Progress Reports*

The City will continue to report annually on the City’s progress toward its 8-year RHNA housing production targets and toward implementation of the programs identified in the Housing Element. Further, the City will identify and prioritize State and local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports (AB 1255, 2019; AB 1486, 2019; AB 879, 2017).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Report to HCD annually on progress made toward the Housing Element.</li> <li>• Report to the City Council annually on Housing Element progress.</li> </ul>
<b>Timeframe</b>	Annually <u>reporting</u> throughout the planning period.
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	2.1, 2.2, 2.3

*Program 7: By-Right Development*

The City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified in the Sites Inventory to accommodate the lower-income RHNA that were previously identified in past Housing Elements in accordance with the specifications of Government Code Section 65583.2(c) and Housing Element law. Specifically, three nonvacant parcels (Assessor’s Parcel Number 4137-001-900, 4170-026-003, and 4170-026-004 in Lower-Income Sites 1 and 2) identified in the Sites Inventory to accommodate the lower-income RHNA were identified in a prior housing element.<sup>7</sup> As such, Sites 1 and 2, as identified under the column “Table ID” in **Table 7, Lower-Income Sites Identified, of Appendix E**, will allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

<sup>7</sup> See the Electronic Housing Element Site Inventory Form included as Exhibit A in Appendix E, Sites Analysis and Inventory, for a complete list of parcels identified in the Sites Inventory.

<b><u>Objective</u></b>	<u>Permit development by-right on qualifying sites identified to accommodate the lower-income RHNA that were identified in previous Housing Elements in accordance with State law.</u>
<b><u>Timeframe</u></b>	<u>Amend the MBMC by August 2023 to permit by-right development on sites previously identified in past Housing Elements in which at least 20 percent of the units are affordable to lower income households in accordance with the specifications of Government Code Section 65583.2(c)</u> <u>Ongoing throughout planning period.</u>
<b><u>Responsible Agency</u></b>	<u>Community Development Department</u>
<b><u>Funding Sources</u></b>	<u>Community Development Department Budget</u>
<b><u>Relevant Policies</u></b>	<u>1.2, 2.1, 2.2, 2.4</u>

*Program 7: Program 8: Code Compliance*

The City has an active code enforcement program that responds to complaints of substandard structures. A Report of Residential Building Records is required each time a property is sold, which serves to alert all parties to unpermitted and potentially substandard construction that may exist. The City will continue the active code enforcement program for illegal and substandard units.

Code enforcement staff accepts reports of possible code enforcement violations and responds directly to violations related to compliance with the Manhattan Beach Municipal Code (MBMC), including zoning, property maintenance, illegal dwelling units, trash container regulations, and sign violations. Possible violations regarding substandard, nonstructural housing issues are referred to the Environmental Health Division of the Los Angeles County Department of Public Health. The County of Los Angeles Environmental Health Division is responsible for ensuring that residential housing is safe, sanitary, and fit for human habitation. This is accomplished through routine inspections of rental properties with five and or more units, and investigations of complaints. From July 2016 to July 2021, the County of Los Angeles performed 52 inspections in the City of Manhattan Beach.

The City's website clearly provides code enforcement resources and technical assistance to residents. Residents can report a violation, and access educational and technical resources on substandard housing, the City's code enforcement efforts, the violation process and timeline, and directly access the County of Los Angeles Public Health Online Form for substandard housing complaints.

The City will continue to ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Continue requiring a Report of Residential Building Records.</li> <li>• Through the complaint-driven inspections, Code Enforcement will make property owners aware of current resources on the City website to assist with the remediation of violations.</li> <li>• Continue referrals to the County of Los Angeles Environmental Health Division to facilitate approximately 55 inspections throughout the planning period.</li> <li>• Maintain code enforcement and substandard housing resources up to date and ensure they are easily accessible to all residents, including <u>extremely low-</u>, <u>very low-</u>, <u>-lower-</u> and moderate-income households.</li> </ul>
<b>Timeframe</b>	• Ongoing; annually throughout the planning period.
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.3, 1.4, 3.1, 3.2, 3.3, 4.1, 4.3

***Program 9: Countywide Affordable Home Ownership Program***

The Home Ownership Program (HOP) is administered by the Los Angeles County Development Authority (LACDA). This program provides funding to lower-income households looking to purchase a home through down payment and closing costs assistance for single-family homes, condominiums, and townhomes. The HOP loan provides a second mortgage loan for first-time homebuyers with an assistance amount of up to \$85,000, or 20 percent of the purchase prices, whichever is less, and offers 0 percent interest loans. Participant's income must not exceed 80 percent of the County Median Income based on the number of persons in the household. Properties must be located in cities participating in the HOP, which includes Manhattan Beach. The City will advertise program availability on the City's website and at the planning counter.

<b><u>Objectives</u></b>	<u>Advertise HOP on the City's website and for distribution at the planning counter.</u>
<b><u>Timeframe</u></b>	<ul style="list-style-type: none"> <li>• <u>Program information will be posted online and made available at the planning counter by March 2023.</u></li> <li>• <u>Relevant information on the City website and planning counter will be updated annually, starting March 2024, if there are any changes to the County HOP.</u></li> </ul>
<b><u>Responsible Agency</u></b>	<u>LACDA: Program Funding; Community Development Department: Staff time for program advertisement and website updates.</u>

<b><u>Funding Sources</u></b>	<u>Los Angeles County HOME Allocation; City General Fund: Staff time.</u>
<b><u>Relevant Policies</u></b>	<u>2.3, 4.1</u>

**Program 10: Countywide Affordable Rental Housing Development**

This program is administered by the Los Angeles County Development Authority (LACDA). This program provides financial assistance to developments located in cities participating in the Los Angeles Urban County Program, including the City of Manhattan Beach. This program supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles.

Projects funded through this program are expected to help combat homelessness, meet the housing needs of their communities, provide local economic development opportunities during construction, and assist in the alleviation of any local blighting conditions. This program provides financial and technical assistance to acquire sites, develop affordable rental housing, and acquire and rehabilitate affordable rental housing. Technical assistance and funding for pre-development activities may also be provided for nonprofit housing developers participating in specific projects. The funds are made available as low-interest long term loans. Funds for the program are administered through a Notice of Funding Availability (NOFA) issued by LACDA. All units developed utilizing these resources are made available to households earning less than 50% of the median area income.

The City will advertise the availability of this additional source of funds to support in the development of rental housing. Program availability will be advertised on the City's website and at the planning counter.

Further, the City will increase coordination and collaboration with the LACDA to promote Manhattan Beach as a City that supports affordable housing development and as an ideal candidate for the allocation of funding for affordable housing.

<b><u>Objectives</u></b>	<ul style="list-style-type: none"> <li><u>• Post program information on the City's website and for distribution at the planning counter.</u></li> <li><u>• Increase Coordination with the LACDA with regular contact.</u></li> </ul>
<b><u>Timeframe</u></b>	<ul style="list-style-type: none"> <li><u>• Program information will be posted online and at the counter by March 2023.</u></li> <li><u>• Coordination will be ongoing throughout the planning period through biannual contact beginning June 2023.</u></li> </ul>

<b><u>Responsible Agency</u></b>	<u>Los Angeles County Community Development Commission; Community Development Department for program advertisement and coordination efforts.</u>
<b><u>Funding Sources</u></b>	<u>HOME funds and CDBG allocations, Tax Exempt Multi-Family Revenue Bond, and other County funding sources.</u>
<b><u>Relevant Policies</u></b>	<u>1.2, 1.4, 2.2, 4.2</u>

**Program 8: Program 11: Density Bonus**

State Density Bonus Law requires a local jurisdiction to grant an increase in density, if requested by a developer, for providing affordable housing as part of a development project. Developers in the City use State Density Bonus Law, and the City has a standard application and review procedure for processing density bonus applications as part of housing development applications (MBMC Section 10.94.050, Administration). As of September 2021, there are currently two projects in the City’s residential project pipeline (see full discussion in **Appendix E**) that will use an increase in development density in exchange for setting aside a percentage of the units as affordable housing.

The City incentivizes development of affordable housing by abiding by the local and State density bonus regulations. In addition, to further incentivize affordable units, multifamily projects in residential districts that qualify for a density bonus are eligible for a streamlined approval process, as described in **Programs 3 and 1518**.

Government Code Section 65915 requires that a jurisdiction adopt a local Density Bonus Ordinance consistent with State law. To satisfy this requirement, the City will review and amend the local Density Bonus Program Ordinance to ensure consistency with State requirements, including the provision of a bonus for student affordable housing, senior housing, and permitting up to an 80 percent bonus for 100 percent affordable developments (see amendments needed in **Appendix C, Constraints and Zoning Analysis**).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Update Density Bonus Ordinance, consistent with State law.</li> <li>• Ensure the City’s Density Bonus Ordinance is consistent with future amendments to State Density Bonus Law and case law. Process related LCP Amendments as required.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Amend the Density Bonus Ordinance <u>by March 2023, within 1 year of Housing Element adoption.</u></li> <li>• Ongoing monitoring of future amendments to State Density Bonus Law.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.4, 3.4, 4.2

<b><u>Relevant Programs</u></b>	<a href="#">Program 3: Affordable Housing Streamlining</a> <a href="#">Program 18: Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts</a>
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~~Program 9:~~Program 12: *Developer Outreach and Transparency*

The City will actively work with the development community to identify ways that lower-income housing may be provided, [including housing for extremely low-income households and those with special housing needs](#). The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households. Another outreach effort will inform the development community and property owners about development opportunities for ADUs.

The City will maintain current information on the City’s website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports, consistent with the requirements of AB 1483 (2019).

<b>Objective</b>	Maintain relevant development checklist of materials and other information on the City’s website as detailed above and in AB 1483 (2019).
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Update relevant information that is applicable for housing development project proposal requirements within 30 days of any changes, consistent with AB 1483 (2019).</li> <li>• Ongoing throughout the planning period.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 4.1

~~Program 10:~~Program 13: *Energy Conservation and Energy Efficiency Opportunities*

Manhattan Beach has a long history of environmental leadership, policy, and stewardship, both as a community and as a city government. Under the City’s adopted Environmental Work Plan priorities, adopted Strategic Plan goals, and in compliance with State and General Plan mandates, the City is creating a Climate Resiliency Program, called Climate Ready Manhattan Beach (Climate Ready MB). The Climate Ready MB program includes completing a Sea Level Rise Vulnerability Assessment; creating a Climate Action and Adaptation Plan; and updating the City’s Local Coastal Program–Land Use Plan, Local Hazard Mitigation Plan, and General Plan.

The City is currently working on the Sea Level Rise Risk, Hazards, and Vulnerability Assessment, which will inform the development of the Climate Action and Adaptation Plan, and related Local

Coastal Program–Land Use Plan updates. To protect the City’s coastline and infrastructure and comply with State mandates, the City is also identifying other local climate change impacts that could occur. As outlined in the Climate Ready MB program, the City will develop strategies to increase the community’s resilience to climate change impacts and cut carbon emissions.

In addition, the City has adopted the 2019 California Green Building Standards Code, which includes energy efficiency, water efficiency and conservation, and material conservation and resource efficiency standards to integrate sustainable development and reduce residential and nonresidential building energy use. The City anticipates State Green Building Codes being updated in the next 2 years, at which point the City will also update City regulations, as detailed in [Program 2731, Water Conservation and Green Building Standards](#).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Adopt Climate Action and Adaptation Plan and related Local Coastal Program–Land Use Plan updates.</li> <li>• Review <a href="#">green building techniques</a> in the MBMC <del>to encourage energy efficient building techniques and consider opportunities above and beyond</del> <a href="#">to ensure compliance with</a> State requirements.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Adopt Climate Action and Adaptation Plan and submit Local Coastal Program–Land Use Plan updates to California Coastal Commission by 2023.</li> <li>• Ongoing review of City codes to <a href="#">integrate encourage</a> energy efficient building techniques <a href="#">throughout the planning period</a>.</li> </ul>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>• <del>Environmental Sustainability Division</del></li> <li>• Community Development Department</li> </ul>
<b>Funding Sources</b>	City General Fund and California Coastal Commission LCP Grant and California Climate Investments
<b>Relevant Policies</b>	1.3, 3.1, 3.2, 3.3, 3.4

~~Program 11:~~[Program 14: Fair/Equal Housing Program](#)

This City Fair/Equal Housing Program is designed to promote equal housing opportunities in Manhattan Beach. The City recognizes the effect that discrimination has in limiting housing choice and equal opportunity in renting, selling, and financing housing. [In accordance with Government Code Section 8899.50 \(b\)\(1\), the City administers its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and takes no action that is materially inconsistent with its obligation to affirmatively further fair housing.](#) The City contracts with the Housing Rights Center, a nonprofit organization that helps educate the public about fair housing laws and to investigate reported cases of housing discrimination. The Housing Rights Center provides free services, including landlord/tenant counseling, outreach and education, and discrimination investigations. The City offers fair housing

information and referrals upon request. The City will continue referral services and contracting fair housing services with the Housing Rights Center, and will work to provide this information and will provide links to additional fair housing resources on the City’s website.

Additionally, the City will take the following steps to affirmatively further fair housing during the planning period:

- The City will continue to support and participate in the Regional Analysis of Impediments to Fair Housing Choice in coordination with the Community Development Commission of the County of Los Angeles and the Housing Authority of the County of Los Angeles.
- The City will promote compliance with housing discrimination laws by developing a handout for developers to be made aware of fair housing advertisement material requirements related to the sale or rental of housing pursuant to Government Code Section 12955, which prohibits advertisement materials from indicating a preference or limitation based on a protected classification.
- The City will administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing by developing a process that prompts the consideration of fair housing in the decision process. This process could include a requirement to have a statement of fair housing consideration on all decision letters or staff reports, whichever is applicable.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Support and engage in the Regional Analysis of Impediments to Fair Housing.</li> <li>• Post fair housing information on the City’s website.</li> <li>• Develop a handout for developers to be made aware of fair housing advertisement material compliance and make publicly available.</li> <li>• Implement a procedure that prompts fair housing administration for housing and community development decisions.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing engagement throughout the planning period with updated Regional Analysis of Impediments to Fair Housing every 5 years.</li> <li>• Website information and developer handout to be posted and made available <del>by January 2023, within 1 year of Housing Element adoption.</del></li> <li>• Develop fair housing administration procedure <del>by March 2023, within 1 year of Housing Element adoption.</del></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.3. 3.1, 4.1, 4.2, 4.3



~~Program 12:~~Program 15: *Housing Choice Voucher Program*

An important element of the City’s strategy in providing housing opportunities for extremely low-income and low-income households is the Section 8 Housing Choice Voucher Program, a program offering tenant-based assistance subsidized by the Federal government for very low-income families, older adults, and persons with disabilities. Decent, safe, and sanitary housing units are provided to households through rental vouchers. Participants find their own rental housing in the open market and pay a portion of their income toward rent. The Los Angeles County Development Authority subsidizes the balance of the monthly rent in direct payments to the owner through funding received by the U.S. Department of Housing and Urban Development.

The Redondo Beach Housing Authority locally administers the Housing Choice Voucher Program for Manhattan Beach. Currently, there are five Section 8 Vouchers administered in the City. The City will continue to participate in the Los Angeles County Development Authority program, coordinate with the Redondo Beach Housing Authority, and publicize availability of Section 8 rental assistance for households in the City by enhancing the City’s website with information.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Continue to support the provision of five vouchers annually to facilitate rent subsidies for very low- and extremely low-income residents.</li> <li>Enhance City website with information related to the Housing Choice Voucher Program.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Annually throughout the planning period.</li> <li>Update City website <u>by January 2023, within 1 year of Housing Element adoption.</u></li> </ul>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li>Los Angeles County Development Authority</li> <li>Community Development Department</li> </ul>
<b>Funding Sources</b>	Federal Section 8 funds
<b>Relevant Policies</b>	1.4, 2.3, 4.1, 4.3

~~Program 13:~~Program 16: *Lot Consolidation Incentive*

The City already provides an additional density bonus incentive under Section 10.12.030 of the MBMC above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus. The incentive is granted in exchange for lot consolidation, in accordance with the following formula:

Combined Parcel Size	Base Density Increase*
Less than 0.50 acres	No increase
0.50 acres to 0.99 acres	5% increase
1.00 acre or more	10% increase

\* Excluding density bonus

As shown in the table above, and in accordance with MBMC Section 10.12.030, multifamily developments meeting the minimum requirements are currently granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.50 acres to 0.99 acres through the existing lot consolidation bonus incentive. However, to specifically incentivize affordable housing, including housing for extremely low- and very low-income households, and reach the City's housing target for the 6th Cycle planning period and incentivize small lot development, the City will expand the current lot consolidation incentive for sites that have been identified in the Sites Inventory.<sup>8</sup> See the Electronic Housing Element Site Inventory Form included as Exhibit A of Appendix E, Sites Analysis and Inventory, for a complete list of parcels identified in the Sites Inventory. Sites identified in the Sites Inventory will be granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.30 acres to 0.49 acres.

In addition, tThe City will continue to facilitate consolidation and development of small parcels through the following actions:

- Publicize the lot consolidation program on the City's website, at the Planning counter, and by notice to affordable housing providers.
- Assist affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database.
- Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.

<b>Objectives</b>	<ul style="list-style-type: none"><li>• Publicize the program on the City's website, at the Planning counter, and by notice to affordable housing providers.</li><li>• The City will assist affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database.</li><li>• Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.</li><li>• <u>Amend Section 10.12.030 of the MBMC to provide a lot consolidation bonus incentive for sites between 0.30 acres to 0.49 acres identified in Exhibit A, Electronic Housing Element Site Inventory Form, of Appendix E.</u></li></ul>
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<sup>8</sup> See Tables 7, 8, 9, 15 and 16 in Appendix E, Sites Analysis and Inventory, for additional parcel details.

<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Develop promotional material to publicize program <u>and update City's GIS system and property database by February 2024, within 2 years of Housing Element adoption.</u></li> <li>• Dedication of staff time and technical assistance, <u>including assisting affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database,</u> ongoing throughout the planning period.</li> <li>• <u>Ongoing expedited processing and fee waivers for lot consolidations processed concurrently with other planning entitlements throughout the planning period.</u></li> <li>• <u>Amend Section 10.12.030 of the Zoning Code by August 2023. Process LCP Amendments as required.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 2.4, 4.2

*Program 14: Program 17: Manufactured Housing*

As defined in the MBMC, a mobile home is considered a manufactured home, which includes factory-built housing on a permanent foundation. State law requires that the City's Zoning Code permit manufactured housing in the same manner and in the same zone(s) as conventional single-family dwellings in zones that permit single-family dwellings (Government Code Section 65852.3). Although the current Zoning Code includes manufactured homes as a multifamily residential classification, MBMC Section 10.52.100 dictates that manufactured housing is only permitted in residential zoning districts, and is not allowed as an additional unit on an already developed lot or as an ADU on an already developed lot. To comply with State law, the City will amend the Zoning Code to clarify that manufactured housing is treated as a single-family dwelling and is permitted in all of the same zones and same manner as other single-family structures, including in commercial or mixed-use zones.

State law requires that cities and counties allow mobile home parks (including condominium and cooperative parks) on all land planned and zoned for residential land use, provided, however, that a use permit may be required (Government Code Section 65852.7). The MBMC does not currently define mobile home parks; therefore, it also does not identify zoning districts in which this use is permitted. To comply with State law, the City will amend the MBMC to permit mobile home parks on all land zoned or planned for residential land uses. In addition, the City will enforce mobile home park replacement and relocation requirements in accordance with State law (Government Code Section 65863.7).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Amend the MBMC to ensure consistency with State law regarding manufactured homes.</li> </ul>
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	<ul style="list-style-type: none"> <li>Amend the MBMC to ensure consistency with State law regarding mobile home parks.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Amend the MBMC and submit related LCP Amendment applications <u>by March 2023, within 1 year of Housing Element adoption.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.2, 2.4, 4.1

~~Program 15:~~Program 18: *Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts*

~~To minimize constraints to the development of affordable housing, including housing for extremely low- and very low-income households, u~~Under the City's current regulations, multifamily housing developments in residential zones with fewer than six units are permitted. Projects with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan approved by the Director.

Multifamily housing developments in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) Districts are currently permitted through approval of a Conditional Use Permit. To further incentivize affordable housing in the City, ~~and as programmed in the 5th Cycle Housing Element,~~ the City will remove the discretionary requirements for multifamily housing in the CL, CD, and CNE zones meeting the minimum requirements for a density bonus, ~~as detailed in Program 8.~~ The City will review and amend the Zoning Code to permit residential uses in the CL, CD, and CNE zones without requiring approval of a Conditional Use Permit, and all projects that use the State density bonus will be eligible for streamlined approvals.

Additionally, under Chapter 10.16, Commercial Districts, of the MBMC, portions of a building intended for residential use in a mixed-use project or purely residential developments in mixed-use zones are currently subject to the High-Density Residential District residential standards in Chapter 10.12, Residential Districts, of the MBMC. To minimize constraints to the development of affordable housing, including housing for extremely low- and very low-income households~~As part of this program,~~ the City will adopt development standards for multifamily residential and mixed-use projects in the three commercial mixed-use zones (CL, CD, and CNE) instead of deferring to the High-Density Residential standards, which are subject to voter approval for certain amendments to residential development standards.<sup>9</sup> The City will ensure that the adopted

<sup>9</sup> In accordance with Section 10.12.0030, Property development regulations: RS, RM, and RH district, the property development standards for the residential zoning districts, RS, RM and RH, shall not be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions or minimum lot area per dwelling unit, unless the amendment is first submitted to a city-wide election and approved by a majority of the voters.

standards for residential and mixed-use projects do not reduce the intensity of land use<sup>10</sup> or reduce the site's residential development capacity, consistent with the Housing Crisis Act of 2019. Through this process, the City will implement ~~the objective design standards in Program 1720,~~ Objective Design Standards, through the development of new objective design standards.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Amend the Zoning Code to remove discretionary requirements and provide streamlined processing for multifamily housing in the CL, CD, and CNE zones for projects that qualify for a density bonus.</li> <li>Adopt development standards for multifamily residential and mixed-use projects in the CL, CD, and CNE zones.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Amend the Zoning Code and related LCP Amendments <u>by August 2023, within 1 year of Housing Element adoption.</u></li> <li>Streamlining availability to be ongoing throughout the planning period, <u>following Housing Element adoption.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.3, 2.4, 3.4, 4.2
<b>Relevant Programs</b>	<u>Program 3: Affordable Housing Streamlining</u> <u>Program 11: Density Bonus</u> <u>Program 20: Objective Design Standards</u>

~~Program 16: Program 19:~~ No Net Loss

The City will use its development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under SB 166 (2017). The City will develop and implement a monitoring procedure pursuant to Government Code Section 65863, and will make the findings required by that code section if a site is proposed for development with fewer units or at a different income level than shown in the Housing Element.

As part of Program 2, Adequate Sites, the City will rezone to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. This will ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period; however, if, at any time during the planning period, a development project results in fewer units by income category than identified in the Sites Inventory (Appendix E) for that parcel and the City cannot find that the remaining sites in the

<sup>10</sup> In accordance with State law, "reducing the intensity of land use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site's residential development capacity.

Housing Element are adequate to accommodate the remaining RHNA by income level, the City will, within 180 days, identify and make available additional adequate sites to accommodate the remaining RHNA.

Furthermore, as outlined in **Program 1, Accessory Dwelling Units**, the City reviews and approves ADU entitlements and tracks the timely review of ADU applications and building permits issued. The Community Development Department collects data annually on planning entitlements and building permits for ADUs for the Housing Element Annual Progress Report. As part of this program, the Community Development Department commits to continue monitoring the development of ADU's, including affordability. Specifically, the Community Development Department will continue using its development permit database to monitor the development of ADU's per the ADU projection assumptions in the Sites Inventory (see **Appendix E** for the full **Accessory Dwelling Unit Projection analysis**). The City will compare the number of planning entitlements and building permits for ADUs each year compared to the average of 10 ADUs projected annually during the projection period per the ADU projection assumptions in the Sites Inventory. The City will check the annual ADU trends at the planning cycle mid-point (October 15, 2025), if the City finds that the ADU production does not keep pace with the ADU assumptions toward the RHNA, and that there is not an appropriate buffer of sites remaining to account for the deficit of projected lower- or moderate-income ADUs, the City will identify additional sites within six months. If the City finds that the ADU production does not keep pace with the ADU assumptions, the City will also review and streamline permitting procedures and review and reallocate existing staffing resources as needed to achieve its goal as part of **Program 1, Accessory Dwelling Units** (See **Program 1** for objectives and timelines tied to ADU incentives).

For example, if the City averaged 5 ADUs annually for a total of 21 ADUs, including 14 affordable to lower- or moderate-income households, between the start of the 6th RHNA projection period, (June 30, 2021) and the planning cycle mid-point (October 15, 2025), compared to the average of 10 ADUs projected annually per the Sites Inventory's ADU assumptions, then the City would find that ADU production in the City was not keeping pace with the ADU assumptions toward the RHNA. In this example, the City would be approximately 22 total units behind the ADU assumptions of approximately 43 ADUs by the planning cycle mid-point, including approximately 15 ADUs affordable to lower- or moderate-income households. If the City could not find that the remaining buffer sites (see details related to buffer sites in **Program 2, Adequate Sites**) were adequate to accommodate the 15 unit difference in the projected number of ADUs affordable to lower- or moderate-income households to be permitted by the planning cycle mid-point and the actual number of ADUs permitted, then the City will identify additional sites within six months. An example table has been provided below.

<b>Projected Versus Actual ADUs for Planning Cycle Mid-Point: June 30, 2021 – October 15, 2025</b>				
<u>Income Level</u>	<u>Percent of ADUs</u>	<u>Projected ADUs for 6th RHNA Projection Period<sup>1</sup></u>	<u>Projected ADUs for Planning Cycle Mid-Point (4.3 years) 6/30/21-10/15/25</u>	<u>Actual Number of ADUs Permitted Between 6/30/21-10/15/25</u>
<u>Lower-Income</u>	<u>60%</u>	<u>50</u>	<u>26</u>	
<u>Moderate-Income</u>	<u>6%</u>	<u>5</u>	<u>3</u>	

**Projected Versus Actual ADUs for Planning Cycle Mid-Point:  
June 30, 2021 – October 15, 2025**

<u>Above Moderate-Income</u>	<u>34%</u>	<u>28</u>	<u>14</u>
<u>Total</u>	<u>100%</u>	<u>83</u>	<u>43</u>

Source: SCAG Regional Accessory Dwelling Unit Affordability Analysis, 2020

1. 6th RHNA Projection Period (8.3 years): June 30, 2021 – October 15, 2029  
ADU = accessory dwelling unit

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>• Amend staff procedures to ensure all development proposals and rezone proposals are reviewed against the capacity identified for sites in the Sites Inventory (<b>Appendix E</b>).</li> <li>• Develop a methodology for tracking remaining capacity and monitor all development activity, proposed rezones, and identified capacity as it compares to the remaining RHNA target throughout the cycle. Any site identified to be upzoned to meet “no net loss” requirements will satisfy the adequate site requirements of Section 65583.2 and will be consistent with the City’s obligation to affirmatively further fair housing.</li> <li>• <u>Monitor the development of ADUs per the ADU projection assumptions in the Sites Inventory (<b>Appendix E</b>) and collect and report data for the Housing Element Annual Progress Report.</u></li> <li>• <u>Check annual ADU trends to date at the planning cycle mid-point (October 15, 2025) and identify additional lower- and moderate-income sites if the ADU production does not keep pace with the ADU assumptions toward the RHNA.</u></li> <li>• Review each housing approval on sites listed in the Housing Element and make findings required by Government Code Section 65863 if a site is proposed with fewer units or a different income level than shown in the Housing Element.</li> </ul>
<p><b>Timeframe</b></p>	<ul style="list-style-type: none"> <li>• Amend staff procedures and develop a methodology for tracking capacity <u>upon Housing Element adoption by March 2022.</u></li> <li>• <u>Ongoing monitoring the development of ADU’s using the City’s development permit database and report ADU trends annually through the Housing Element Annual Progress Report.</u></li> <li>• <u>Check annual ADU trends to-date by November 2025. Identify additional sites by June 2026 if ADU production does not keep pace with the ADU assumptions toward the RHNA and there is not an appropriate buffer remaining.</u></li> </ul>

	<ul style="list-style-type: none"> <li>Ongoing tracking of sites throughout the planning period and make additional sites available within 180 days in the event that a capacity shortfall occurs.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 1.4, 2.1, 2.2
<b><u>Relevant Programs</u></b>	<u>Program 1: Accessory Dwelling Units</u> <u>Program 2: Adequate Sites</u>

*Program 17: Program 20: Objective Design Standards*

The City will increase transparency and certainty in the development process through objective design standards. Any new design standards developed and imposed by the City shall be objective without involvement of personal or subjective judgement by a public official, and shall be uniformly verifiable by reference to the City’s regulations in accordance with the requirements of the Housing Crisis Act of 2019 (SB 330, 2019) and related State housing law.

<b>Objective</b>	Monitor Zoning Code amendments to ensure any new design standards are objective.
<b>Timeframe</b>	Ongoing throughout the planning period, as new design standards are being drafted.
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	1.2, 2.2, 2.4, 3.1, 4.2

*Program 21: Older Adults Programs*

The City provides various services for the special needs of older adults so that they may remain in the community. The older adults of the community regularly rely on these resources for services and programming. The Older Adults Program provides services to predominantly lower-income older adults, including those with extremely low-incomes, and provides some services for residents with disabilities (all ages).

This program is operated by a part-time Older Adults Program Manager who is contracted through the Beach Cities Health District and the City of Manhattan Beach Fire Department. At any given time, the Older Adults Program may assist up to 100 older adults, of whom 70 percent are lower-income. As liaison and service coordinator, the Older Adults Program Manager performs the following functions:

1. Locates suitable (often more affordable) housing. This may include referrals to “board and care” residential facilities in Manhattan Beach, or multifamily apartments.



2. Identifies financial assistance resources, including U.S. Housing and Urban Development’s Section 8 rental vouchers through the County of Los Angeles, and other Federal assistance programs, as well as disbursing information and referring to lenders for special mortgage programs.
3. Coordinates Rotary Cares, a volunteer program that rehabilitates two senior homes per year, consisting of minor repairs, plumbing, carpentry, painting, and other improvements.
4. Arranges and makes referrals for health and personal services for the Senior Health Program, which is funded by the Beach Cities Health District’s Community Care Services and other community resources available for older adults.

The City also provides funds for social service groups serving older adults, including the Salvation Army’s Brown Bag Food Program, Care Management for Manhattan Beach Seniors, and South Bay Adult Care Center. Additionally, the City’s Parks and Recreation Department has a full-time Older Adults Program Supervisor, plus support staff, who provides numerous services and programs to older adults, including arts and crafts, drama, acting, poetry, and fitness classes; softball leagues; and bingo nights. In addition, the City provides the Manhattan Beach Dial-A-Ride services, which is a shared ride, curb-to-curb bus service for Manhattan Beach residents who are 55+ years old or who have disabilities (all ages) to assist them with things such as picking up medication, doctor visits, and groceries.

The City is also providing temporary technical assistance to older adults by helping older adults with changes resulting from the Clean Power Alliance program, an electricity supply provider offering renewable energy at competitive rates to the community, and with managing changes to their energy bills. The City also provides links and information on its website to resources provided by Clean Power Alliance, which include financial assistance programs for lower-income people and people with special needs.

Additionally, the City recently approved an assisted living project for older adults in 2021, consisting of 95 rooms (115 total beds), a facility kitchen, and common areas (foyer, parlor, bistro, private dining room, general dining rooms, activity rooms, and staff rooms). The project will include 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss. The project is expected to be completed and increase assisted living opportunities for older adults in the City during the planning period.

<b><u>Objectives</u></b>	<ul style="list-style-type: none"> <li>• <u>Continue providing services to 1,000 older adults per year through the Older Adults Program.</u></li> <li>• <u>Continue providing Dial-a-Ride services to 1,000 older adults and/or residents with disabilities (all ages) per year.</u></li> </ul>
<b><u>Timeframe</u></b>	<u>Ongoing, annually throughout planning period.</u>
<b><u>Responsible Agencies</u></b>	<ul style="list-style-type: none"> <li>• <u>Senior Services Care Manager</u></li> <li>• <u>Fire Department</u></li> </ul>

	<ul style="list-style-type: none"> <li><a href="#">Parks and Recreation Department</a></li> </ul>
<b>Funding Sources</b>	<a href="#">General Fund / Beach Cities Health District</a>
<b>Relevant Policies</b>	<a href="#">1.3, 2.3, 3.1, 3.2, 4.1</a>

*Program 18: Program 22: Parking Reductions in Exchange for Housing at Religious Institutions*

Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing for vulnerable populations. The City will make Zoning Code revisions to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development (AB 1851).

The City currently provides reduced parking requirements consistent with AB 2345 (2020) for housing developments that qualify for a density bonus pursuant to State density bonus law. To identify opportunities for additional parking reductions for residential multifamily housing, the City will complete a parking study for sites that are zoned to allow residential development outside of the Coastal Zone. This may include, but not be limited to, reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities.

<b>Objective</b>	<ul style="list-style-type: none"> <li><u>Amend the Zoning Code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.</u></li> <li><u>Complete a parking study for reduced parking requirements for multifamily housing and implement flexibility in parking requirements based on findings.</u></li> </ul>
<b>Timeframe</b>	Amend the Zoning Code to comply with religious institution–affiliated housing development projects <u>by March 2023, within 1 year of Housing Element adoption.</u> Process LCP Amendments as required. <ul style="list-style-type: none"> <li><u>Complete parking study by June 2024. Based on findings, amend the Zoning Code by January 2025.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.1, 2.2, 2.4, 4.1, 4.2

*Program 19: Program 23: Preserving Housing Capacity*

Section 10.12.030 of the MBMC establishes standards to avoid “mansionization.” These provisions act to discourage construction of overly large dwellings that are out of scale with the surrounding neighborhood. These provisions include increased setback and open space requirements for new single-family residences. In addition to issues of scale, the large dwellings are also more costly, and lead to increased pressure to demolish modest dwellings in favor of lavish structures affordable only to the most affluent. In an effort to incentivize multifamily housing while continuing to disincentivize “mansionization,” the City provides an exception for minimum and maximum lot sizes for multifamily housing with three or more dwelling units in accordance with Section 10.12.030.k of the MBMC. The City also provides an exception to a lot merger of parcels for existing religious assembly and public or private school uses, when the site is used as a single building site under Section 11.32.090 of the MBMC.

Many single-family homes in the City have been previously constructed on double lots. The maximum lot standards noted above help prevent consolidation of lots for the purpose of developing large, single dwelling units. However, under Section 10.52.050.F of the MBMC, property owners in residential zones may develop contiguous separate lots as one site without requiring a lot merger, with only detached accessory structure(s) on one or more of the lots, which includes guest houses, garages and parking areas, and pools. For development standards, with the exception of the parking calculation, the lots are treated as separate. This presents property owners with the opportunity to buy adjacent lots with existing unit(s) for the purpose of demolishing the unit(s) and developing only detached accessory structure(s), ultimately reducing the City’s overall housing stock. To mitigate the loss of dwelling units through demolition and to conserve the existing housing stock, the City will amend the MBMC to eliminate provision 10.52.050.F from the Zoning Code such that all parcels operating as one site will need to be consolidated and therefore be subject to existing maximum lot size requirements.

Further, while the City incentivizes lot consolidation for multifamily residential developments, as detailed in **Program 163, Lot Consolidation Incentive**, the City will refrain from approving any merger that would result in a net loss in residential capacity and conflict with the no-net-loss provisions of SB 330 (see **Program 2226, Replacement Requirements**).

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Continue to implement Sections 10.12.030 and 11.32.090 of the MBMC to prevent mansionization and lot mergers that reduce future housing capacity.</li> <li>• Amend the Zoning Code to eliminate provision 10.52.050.F to mitigate the loss of dwelling units through demolition and to conserve the existing housing stock.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• Ongoing implementation of Sections 10.12.030 and 11.32.090 of the MBMC <u>throughout the planning period.</u></li> <li>• Amend the Zoning Code <u>by January 2024, within 2 years of Housing Element adoption.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund

<b>Relevant Policies</b>	1.1, 1.2, 1.3, 1.4, 2.1
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*Program 20: Program 24: Priority Services*

Pursuant to Chapter 727, Statutes of 2005 (SB 1087), the City is required to deliver its adopted Housing Element and any amendments thereto to local water and sewer service providers. This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects. The City is the direct provider of water, sewer, and storm drain maintenance. As such, the City will internally coordinate with the Public Works Department for review and consideration when reviewing new residential projects.

The City’s current Urban Water Management Plan acknowledges the requirements and includes the projected water use for single-family and multifamily housing needed for lower-income households. The Community Development Department will coordinate with Public Works to ensure that proposed developments that include housing affordable to lower-income households, including extremely low- and very low-income households, are prioritized for the provision of water and sewer services. Internal coordination will further support the prioritization of water and sewer services for future residential development, including units affordable to lower-income households.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Internally distribute adopted Housing Element to Public Works Department.</li> <li>Increased coordination with the Public Works Department to ensure that adopted policies prioritize water and sewer allocation for affordable housing development.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Internally distribute adopted Housing Element upon local adoption of the 6th Cycle Housing Element <u>by March 2023</u>.</li> <li>Ongoing coordination <u>throughout the planning period</u>.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	2.1, 2.2, 4.2

*Program 21: Program 25: Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities*

The City adopted a Reasonable Accommodation Ordinance in 2013 to comply with reasonable accommodation procedures of the Fair Housing Act, and one request was received and approved during the 5th Cycle planning period. These procedures are codified in Chapter 10.85 of the MBMC, establishing the City’s procedures related to requests for reasonable accommodations. The process provides a deviation procedure that is available to applicants for circumstances where the existing zoning regulations would preclude residential development for persons with disabilities. Requests for a reasonable accommodation shall be reviewed by the

Community Development Director, and may, in their discretion, refer applications to the Planning Commission for consideration.

Although requests are seldomly referred to the Planning Commission for their consideration and there are no public hearing or noticing requirements tied to their review, the MBMC does not outline the bases on which a decision on the matter could or should be deferred to the Planning Commission. In an effort to proactively remove ambiguities that may impose extra hurdles for people with disabilities, the City will amend the reasonable accommodation procedures to remove discretionary referrals to the Planning Commission, and the requests shall be reviewed and may be granted solely by the Director. In addition, the City will develop materials and outreach methods to increase public awareness and ease of access to policies, programs, and processes addressing reasonable accommodation.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Amend the MBMC to remove potential barriers for people with disabilities, including persons with developmental disabilities, related to requests for reasonable accommodations, and in accordance with current fair housing laws.</li> <li>Develop outreach and dissemination programs and materials for the public and City staff.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Amend the MBMC <u>by March 2023</u>. <del>within 1 year of Housing Element adoption.</del></li> <li>Develop outreach and dissemination materials <u>by January 2024</u>. <del>within 2 years of Housing Element adoption.</del></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.2, 2.4, 3.1, 4.1, 4.2, 4.3

**Program 22: Program 26: Replacement Requirements**

The City will mandate replacement requirements pursuant to the requirements as set forth in Government Code Section 65915, subdivision (c)(3) on sites identified in the Sites Inventory (See the Electronic Housing Element Site Inventory Form included as Exhibit A of Appendix E for a complete list of parcels identified in the Sites Inventory), and consistent with the Housing Crisis Act of 2019 and related State housing law for proposed housing developments on sites that currently have residential uses, or within the past 5 years have had residential uses that have been vacated or demolished that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Amend staff procedures related to the review and issuance of demolition and development permits.</li> </ul>
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	<ul style="list-style-type: none"> <li>Enforce replacement requirements in accordance with Government Code Section 66300, <u>and the requirements as set forth in Government Code Section 65915, subdivision (c)(3).</u></li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Amend staff procedures <u>by January 2023</u> <del>within 1 year of Housing Element adoption.</del></li> <li>Continue ongoing replacement requirements <u>throughout the planning period.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	1.3, 1.4, 2.3, 4.1, 4.3

~~*Program 23: Older Adults Programs*~~

~~The City provides various services for the special needs of older adults so that they may remain in the community. The older adults of the community regularly rely on these resources for services and programming. The Older Adults Program provides services to predominantly lower income older adults, and provides some services for residents with disabilities (all ages).~~

~~This program is operated by a part-time Older Adults Program Manager who is contracted through the Beach Cities Health District and the City of Manhattan Beach Fire Department. At any given time, the Older Adults Program may assist up to 100 older adults, of whom 70 percent are lower income. As liaison and service coordinator, the Older Adults Program Manager performs the following functions:~~

- ~~1. Locates suitable (often more affordable) housing. This may include referrals to “board and care” residential facilities in Manhattan Beach, or multifamily apartments.~~
- ~~2. Identifies financial assistance resources, including U.S. Housing and Urban Development’s Section 8 rental vouchers through the County of Los Angeles, and other Federal assistance programs, as well as disbursing information and referring to lenders for special mortgage programs.~~
- ~~3. Coordinates Rotary Cares, a volunteer program that rehabilitates two senior homes per year, consisting of minor repairs, plumbing, carpentry, painting, and other improvements.~~
- ~~4. Arranges and makes referrals for health and personal services for the Senior Health Program, which is funded by the Beach Cities Health District’s Community Care Services and other community resources available for older adults.~~

~~The City also provides funds for social service groups serving older adults, including the Salvation Army’s Brown Bag Food Program, Care Management for Manhattan Beach Seniors, and South Bay Adult Care Center. Additionally, the City’s Parks and Recreation Department has a full-time Older Adults Program Supervisor, plus support staff, who provides numerous services and programs to older adults, including arts and crafts, drama, acting, poetry, and fitness classes; softball leagues; and bingo nights. In addition, the City provides the Manhattan Beach Dial-A-~~

~~Ride services, which is a shared ride, curb-to-curb bus service for Manhattan Beach residents who are 55+ years old or who have disabilities (all ages) to assist them with things such as picking up medication, doctor visits, and groceries.~~

~~The City is also providing temporary technical assistance to older adults by helping older adults with changes resulting from the Clean Power Alliance program, an electricity supply provider offering renewable energy at competitive rates to the community, and with managing changes to their energy bills. The City also provides links and information on its website to resources provided by Clean Power Alliance, which include financial assistance programs for lower-income people and people with special needs.~~

~~Additionally, the City recently approved an assisted living project for older adults in 2021, consisting of 95 rooms (115 total beds), a facility kitchen, and common areas (foyer, parlor, bistro, private dining room, general dining rooms, activity rooms, and staff rooms). The project will include 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss. The project is expected to be completed and increase assisted living opportunities for older adults in the City during the planning period.~~

<b>Objectives</b>	<ul style="list-style-type: none"> <li><del>• Continue providing services to 1,000 older adults per year through the Older Adults Program.</del></li> <li><del>• Continue providing Dial-a-Ride services to 1,000 older adults and/or residents with disabilities (all ages) per year.</del></li> </ul>
<b>Timeframe</b>	<del>Ongoing</del>
<b>Responsible Agencies</b>	<ul style="list-style-type: none"> <li><del>• Senior Services Care Manager</del></li> <li><del>• Fire Department</del></li> <li><del>• Parks and Recreation Department</del></li> </ul>
<b>Funding Sources</b>	<del>General Fund / Beach Cities Health District</del>
<b>Relevant Policies</b>	<del>1.3, 2.3, 3.1, 3.2, 4.1</del>

~~Program 24:~~Program 27: Solar Panel Incentives

Solar panels may be used on roofs of residential and commercial structures to generate electricity that is either transmitted to the grid or stored in batteries on site. The existing height limits in Manhattan Beach ensure rooftop solar units would not eventually be subject to shade and shadow, which would render them ineffective.

To ~~encourage~~successfully promote the use of alternate energy, the City has subsidized permitting fees for solar panels since 2008. The current permit fee for solar panels is \$100. The City’s fee incentives resulted in 800 solar permits issued during the 5th Cycle planning period. The City will continue to promote and incentivize alternate energy through permit subsidies for solar panels.

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Promote and incentivize alternate energy through permit subsidies for approximately 90 solar permits per year.</li> <li>Continue to track number of solar permits.</li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>Ongoing <a href="#">annually throughout the planning period</a>.</li> <li>Annual monitoring to track permits.</li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	3.2, 3.3, 3.4

~~Program 25:~~**Program 28:** *Specialized Housing Types to Assist Persons with Special Needs*

**Employee Housing**

Pursuant to the State Employee Housing Act (Section 17000 et seq. of the Health and Safety Code), employee housing for agricultural workers consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single family or household is permitted by right in a zoning district that permits agricultural uses by right. Therefore, for properties that permit agricultural uses by right, a local jurisdiction may not treat employee housing that meets the above criteria any differently than an agricultural use. The Employee Housing Act also requires that any employee housing providing accommodations for six or fewer employees be treated as a single-family structure, with no Conditional or Special Use Permit or variance required.

Employee housing is not currently defined in the MBMC because the City does not currently have any zones that permit agricultural uses, and no agricultural land exists in the City; accordingly, no specific provisions are included regarding this use. If the Zoning Code is ever amended to add a zoning district that permits agricultural uses, the City will make corresponding MBMC amendments related to agricultural workers and current employee housing requirements consistent with State law, [to assist in the production of this special housing type to serve lower-income households, including extremely low-income households](#).

**Emergency Shelters**

Pursuant to State law, local governments must identify one or more zoning categories that allow emergency shelters (year-round shelters for people experiencing homelessness) without discretionary review. [Emergency shelters serve those experiencing homelessness, including extremely low-income households and those with special housing needs](#). In compliance with State law, the MBMC allows emergency shelters by-right in the Public and Semi-Public (PS) and Industrial Park (IP) zones subject to non-discretionary approval. However, the City will amend the MBMC to ensure that parking requirements for emergency shelters accommodate the staff working in the shelter and do not require more parking than other residential or commercial uses within the same zone (AB 139, 2019).

**Supportive Housing**



State law mandates that local jurisdictions consider supportive housing a residential use of property allowed subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The MBMC allows supportive housing as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone in accordance with State law.

In addition, State law provisions have recently been modified to require approval of supportive housing that meets the specified requirements of State law as a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses (AB 2162). Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within 0.5 miles of a public transit stop (Government Code Section 65915). The City will amend the MBMC to comply with current State law. [This amendment will provide additional housing opportunities for lower-income households, including extremely low-income housing and those with special housing needs.](#)

### **Low-Barrier Navigation Centers**

Low-Barrier Navigation Centers are housing-first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The MBMC does not currently define Low-Barrier Navigation Centers; therefore, it also does not identify zoning districts in which this use is permitted.

The City will amend the MBMC to permit the development of Low-Barrier Navigation Centers that meet the requirements of State law as a use by-right, without requiring a discretionary action, in mixed-use and nonresidential zones that permit multifamily uses (AB 101). [This use will increase opportunities to serve those experiencing homelessness, including extremely low-income households and those with special housing needs.](#)

### **Residential Care Facilities**

[Residential Care Facilities serving seven or more persons, referred to as Residential Care, General in the MBMC, is classified as a public and semipublic use under Section 10.08.040 - Public and Semipublic Use Classifications of the MBMC. As such, these facilities are conditionally permitted uses requiring a Use Permit in the PS \(Public and Semi-Public\) zone. Further, the City facilitates additional opportunities for development of Residential Care, General by permitting these facilities in two additional zoning categories \(residential and commercial\), including the RH, RPD, RSC, and CG, subject to a Use Permit.](#)

[Due to the complexity associated with Residential Care Facilities, the necessary infrastructure, and requirements tied to state licensing, opportunities to remove the discretionary permit are limited. However, the City will mitigate any constraints that may be posed by a Use Permit for Residential Care Facilities by making the approval process more predictable and transparent. Currently, Residential Care, General facilities are subject to the broader findings for all Use Permits outlined in Section 10.84.060 - Required Findings, of the MBMC. The City will amend the Zoning Code to include findings specific to Use Permits for Residential Care, General \(serving seven or more persons\) facilities. The City will ensure the findings are objective and improve certainty in the](#)

development approval process to better facilitate the production of Residential Care Facilities to serve the needs of the community.

Separately, but sharing a common goal, the City provides reasonable accommodation procedures for those with disabilities as outlined in Program 25. Through implementation of Program 25, the City will remove discretionary referrals to the Planning Commission, and the requests shall be reviewed and may be granted solely by the Director. The process provides a deviation procedure that is available to applicants for circumstances where the existing development regulations would preclude residential development for persons with disabilities.

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>• Ensure the MBMC continues to be consistent with State law and case law relative to special needs housing through ongoing review and amendments, as <u>required under State law, needed.</u></li> <li>• Amend the MBMC to permit supportive housing in accordance with State law.</li> <li>• Amend the parking requirements for emergency shelters to ensure consistency with State law.</li> <li>• Amend the MBMC to ensure that any application for supportive housing or a Low-Barrier Navigation Center is processed “by right” in accordance with State law.</li> <li>• <u>Amend the MBMC to include findings specific to Use Permits for Residential Care, General (serving seven or more persons) facilities that are objective and improve certainty in the development approval process.</u></li> </ul>
<p><b>Timeframe</b></p>	<ul style="list-style-type: none"> <li>• Annual monitoring of State laws regarding special needs housing, <u>throughout the planning period.</u></li> <li>• Adopt policies and procedures for processing supportive housing and Low-Barrier Navigation Centers <u>by January 2023, within 1 year of Housing Element adoption.</u></li> <li>• Amend the MBMC <u>by March 2023, within 1 year of Housing Element adoption.</u></li> </ul>
<p><b>Responsible Agency</b></p>	<p>Community Development Department</p>
<p><b>Funding Sources</b></p>	<p>General Fund</p>
<p><b>Relevant Policies</b></p>	<p>1.2, 2.2, 2.4, 4.1, 4.2, 4.3</p>

*Program 29: Support for Those Experiencing Homelessness*

In March 2017, the County passed Measure H, which created significant new resources to address homelessness, including Homelessness Plan Implementation Grants for local jurisdictions.

In 2018, the City Council adopted the City’s Five-Year Plan to Address Homelessness in Our Community, containing goals aligned with the City of Manhattan Beach’s and County of Los Angeles’s objectives to address homelessness. The City also submitted a multi-jurisdictional proposal with the Cities of Redondo Beach and Hermosa Beach (all three collectively referred to as “South Bay Beach Cities”) to the County for outreach and education, coordination of regional efforts to address homelessness, and housing navigation services.

In April 2019, the Los Angeles County Homeless Initiative announced the award of Measure H grant funding to the South Bay Beach Cities totaling \$330,665 toward homeless coordination, training, and housing navigation services. Subsequently, the City Council awarded a subcontract to Harbor Interfaith Services to provide three full-time-equivalent positions to assist individuals and families experiencing homelessness in the South Bay Beach Cities.

Consistent with the City’s Homelessness Plan’s efforts to educate the community on various resources in the South Bay, the City has produced a resource guide for those experiencing homelessness, which is available on the City’s website. The guide summarizes a variety of resources offered near Manhattan Beach for those experiencing homelessness and contains a resource card that offers important phone numbers for quick reference.

Under this program, the City will continue to implement the policies and actions of its Five-Year Plan to Address Homelessness in Our Community to continue addressing the needs of its residents experiencing homelessness for affordable housing and housing navigation services. The City will also continue regional coordination utilizing Measure H grant funding in partnership with the Cities of Redondo Beach and Hermosa Beach and seek additional funding sources with the South Bay Beach Cities for continued homeless services. Further, the City will continue to educate the community on various resources in the South Bay and ensure the resource guide for those experiencing homelessness is kept up to date and available on the City’s website.

<p><b><u>Objective</u></b></p>	<ul style="list-style-type: none"> <li>• <u>Seek additional funding sources for continued support services for the population experiencing homelessness.</u></li> <li>• <u>Continue coordination of regional efforts with partner agencies and organizations, such as Cities of Redondo Beach and Hermosa Beach, and the Beach Cities Health District through quarterly meetings.</u></li> <li>• <u>Educate the community on various resources in the South Bay and ensure the resource guide for those experiencing homelessness is kept up to date and available on the City’s website.</u></li> </ul>
<p><b><u>Timeframe</u></b></p>	<ul style="list-style-type: none"> <li>• <u>Ongoing monitoring of funding sources throughout planning period and apply for additional funding opportunities annually during the planning period, where available, beginning January 2023.</u></li> <li>• <u>Ongoing – quarterly communications with partner agencies and organizations.</u></li> </ul>

	<ul style="list-style-type: none"> <li>• <u>Update resource guide on City website annually during the planning period, to reflect any changes to program or resource offered for those experiencing homelessness.</u></li> </ul>
<b>Responsible Agency</b>	<u>Community Development Department</u>
<b>Funding Sources</b>	<u>Grant awarded from the Los Angeles County Measure H funds; General Funds for the staff time (grant applications and educational material).</u>
<b>Relevant Policies</b>	<u>2.3, 3.1, 4.1, 4.3</u>

~~Program 26:~~Program 30: Surplus Lands

The City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Report in accordance with the requirements of AB 1486 (2019). If the City identifies any public land that they intend to declare as surplus land at any point, the City will send notices about available, surplus local public land to HCD, local public entities within the jurisdiction where the surplus local land is located, and any developers who have notified HCD of their interest in developing affordable housing on surplus local public land in accordance with the requirements set forth in the Surplus Land Act (Government Code Section 54220-54234).

<b>Objective</b>	<ul style="list-style-type: none"> <li>• <u>Identify and track surplus City-owned sites. Report on these lands annually through the Housing Element Annual Progress Report.</u></li> <li>• <u>Comply with Surplus Land Act requirements set forth in Government Code Section 54220-54234.</u></li> </ul>
<b>Timeframe</b>	<ul style="list-style-type: none"> <li>• <u>Annually conduct inventory and report surplus and excess local public lands on or before April 1 of each year.</u></li> <li>• <u>Ongoing compliance with Surplus Land Act throughout the planning period.</u></li> </ul>
<b>Responsible Agency</b>	Community Development Department
<b>Funding Sources</b>	Community Development Department
<b>Relevant Policies</b>	1.2, 2.1, 2.2

~~Program 27:~~Program 31: Water Conservation and Green Building Standards

California’s water system is energy intensive, accounting for nearly 10 percent of the State’s greenhouse gas emissions. Actions that improve water-use efficiency can reduce energy use.<sup>11</sup> This can be achieved through many ways, such as using low-flow fixtures and drought-tolerant

<sup>11</sup> Public Policy Institute of California. 2016. [https://www.ppic.org/wp-content/uploads/R\\_1016AER.pdf](https://www.ppic.org/wp-content/uploads/R_1016AER.pdf).

landscaping. Section 7.44.020 of the MBMC addresses water conservation and provides for permanent water conservation measures and drought restrictions. In addition, water conservation requirements apply to 100 percent of projects that the City approves. Water conservation requirements are built into Title 9 via the Green Building Code, and Title 10 via State Model Water Efficient Landscape Ordinance requirements.

The City has adopted the 2019 California Green Building Standards Code, and additionally requires the following measures:

- Insulating hot water pipes to minimize energy loss.
- Using caulk and insulation that are formaldehyde-free or contain low VOCs (volatile organic compounds).
- Installing pre-plumbed water piping and sensor wiring to the roof for future solar water heating.
- Using duct mastic on all duct joints and seams to minimize energy loss.
- Installing Energy Star bath fans vented to the outside.
- Installing energy-efficient water fixtures.

The United States Green Building Council continues to review more-intensive measures to be included in buildings for Leadership in Energy and Environmental Design (LEED) certification. The City continues to review its codes to ~~encourage~~ integrate greener building techniques. The City Council has expressed interest in pursuing green building techniques above and beyond State requirements, a task currently being undertaken through the City’s Sustainability Division’s Climate Ready MB Program. The City reviews standards through the Environmental Task Force and will continue to review and update its codes as updates become available. The City anticipates State Green Building Codes being updated in the next 2 years, at which point the City will also update City regulations.

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>• Review <u>green building techniques in</u> the MBMC <del>to encourage greener building techniques and consider opportunities above and beyond</del> <u>to ensure compliance with</u> State requirements.</li> <li>• Amend the MBMC <del>if needed</del> to conform to future amendments or updates to State Green Building Standards Code <u>if necessary</u>.</li> </ul>
<p><b>Timeframe</b></p>	<ul style="list-style-type: none"> <li>• <del>Ongoing</del> Review of <u>green building techniques in</u> City codes <u>by January 2024</u> <del>to encourage greener building techniques</del>.</li> <li>• Update the MBMC within 1 year after any future amendments or updates to the California Green Building Standards Code.</li> </ul>
<p><b>Responsible Agencies</b></p>	<ul style="list-style-type: none"> <li>• <del>Environmental Task Force</del></li> </ul>

	<ul style="list-style-type: none"> <li>Community Development Department</li> </ul>
<b>Funding Sources</b>	City General Fund
<b>Relevant Policies</b>	3.2, 3.3, 3.4

*Program 28: ~~By-Right Development~~*

~~The City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in the Sites Inventory to accommodate the lower income RHNA that were previously identified in past Housing Elements in accordance with the specifications of Government Code Section 65583.2(c) and Housing Element law.~~

<b>Objective</b>	<del>Permit development by-right on qualifying sites identified to accommodate the lower income RHNA that were identified in previous Housing Elements in accordance with State law.</del>
<b>Timeframe</b>	<del>Ongoing throughout planning period.</del>
<b>Responsible Agency</b>	<del>Community Development Department</del>
<b>Funding Sources</b>	<del>Community Development Department Budget</del>
<b>Relevant Policies</b>	<del>1.2, 2.1, 2.2, 2.4</del>

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# City of Manhattan Beach

## 6th Cycle Housing Element

DRAFT FOR ADOPTION

### Appendices

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Appendix A: 5th Cycle Review

Appendix B: Needs Assessment

Appendix C: Constraints and Zoning Analysis

Appendix D: Affirmatively Furthering Fair Housing Analysis

Appendix E: Sites Analysis and Inventory

Appendix F: Community Engagement Summary



# Appendix A: 5th Cycle Review

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# 1 Introduction

For the 5th Cycle Housing Element (2014–2021), the City of Manhattan Beach (City) committed to specific programs to address the comprehensive housing needs of the City and to help achieve the goals identified in the 5th Cycle Housing Element (5th Cycle). This appendix to the City’s 6th Cycle Housing Element (6th Cycle) evaluates progress made toward the goals and actions of the 5th Cycle Housing Element, and is used as a foundation to inform the programs of the 6th Cycle (2021–2029), tailored to meet this cycle’s housing needs.

California Government Code Section 65588(a) requires each jurisdiction to regularly review its Housing Element to evaluate the following:

- The progress in implementation of the Housing Element
- The effectiveness of the Housing Element programs in progress toward achieving the housing goals and objectives
- The appropriateness of the housing goals, objectives, and policies, and in contributing to the attainment of the State housing goal

# 2 Evaluation of Previous Housing Element Implementation

This evaluation provides information on the extent to which programs have achieved stated objectives, and whether these programs continue to be relevant to addressing current and future housing needs in the City. The success of a program toward achieving the 5th Cycle goals is the basis for the goals, policies, and programs, and the establishment of objectives provided in the 6th Cycle. **Table 1** lists each program from the 2014–2021 Housing Element, and identifies the program’s progress in implementation, effectiveness, and appropriateness. The goals, policies, and programs of the 6th Cycle are reflective of the program effectiveness as determined by this evaluation. **Table 2** provides an overview of the progress in achieving the housing objectives from the 5th Cycle Regional Housing Needs Allocation (RHNA).

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness										
<b>Goal 1. Preserve existing neighborhoods.</b>											
<b>Policy 1. Preserve the scale of development in existing residential neighborhoods.</b>											
<p><b>Program 1a. – Continue to enforce provisions of the Zoning Code which specify District Development Regulations for height, lot coverage, setbacks, open space, and parking.</b> Section 10.12.030 of the MBMC establishes standards to avoid “mansionization*,” including increased setback and open space requirements for new single-family residences. The additional open space must be provided in areas adjacent to streets or in areas that create useable open space. Open space may be provided above the second story, encouraging structures to be built to less than maximum height thereby reducing the mass of homes. The mansionization ordinance also establishes maximum lot sizes in residential districts as follows:</p> <table border="1" data-bbox="121 732 1146 894"> <thead> <tr> <th>District</th> <th>Maximum Lot</th> </tr> </thead> <tbody> <tr> <td>I - Hill Section: Ardmore east, Manhattan Beach Blvd. south</td> <td>15,000 sq. ft.</td> </tr> <tr> <td>II -Tree Section: Ardmore/Blanche east, Manhattan Beach Blvd.south</td> <td>10,800 sq. ft.</td> </tr> <tr> <td>III - Beach area</td> <td>7,000 sq. ft.</td> </tr> <tr> <td>IV - El Porto</td> <td>7,000 sq. ft.</td> </tr> </tbody> </table> <p>Generally, properties in the Medium and High Density Residential zones that are developed with three or more units are exempt from the stricter requirements in order to encourage multi-family development. Section 10.64.030 of the MBMC requires additional enclosed parking for larger residences. Three enclosed parking spaces are required for residences that exceed 3,600 square feet in floor area, whereas residences smaller than 3,600 square feet only need to provide two spaces. Only one space is required for multi-family units with less than 550 square feet. These provisions act to discourage construction of overly large dwellings that are out of scale with the surrounding neighborhood. In addition to issues of scale, the large dwellings are also more costly, and lead to increased pressure to demolish modest dwellings in favor of lavish structures affordable only to the most affluent.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going</p>	District	Maximum Lot	I - Hill Section: Ardmore east, Manhattan Beach Blvd. south	15,000 sq. ft.	II -Tree Section: Ardmore/Blanche east, Manhattan Beach Blvd.south	10,800 sq. ft.	III - Beach area	7,000 sq. ft.	IV - El Porto	7,000 sq. ft.	<p><b>Progress:</b> The City of Manhattan Beach (City) continued to enforce these site development standards, along with a Minor Exceptions process, which provides a certain amount of flexibility for remodeling and expanding non-conforming residences, and in turn preserves existing neighborhoods and deters “mansionization.” During the planning period, over 190 Minor Exceptions have been approved.</p> <p><b>Effectiveness:</b> Planning staff implements this program on a daily basis through plan checks and Planning Entitlement reviews for residential projects, ensuring that all projects meet the development standards provided in the Planning and Zoning Code. Since 2014, 198 Minor Exceptions have been processed, demonstrating the effectiveness of the Minor Exception process. Additionally, the City has granted only five Variances, all of which complied with the required findings, including unique circumstance.</p> <p><b>Appropriateness:</b> This program is implementing existing development standards. Although staff will continue to implement this program through implementation of the existing development standards included in the City’s Planning and Zoning Code, the program is not furthering Housing Element goals, and will not be continued in the 6th Cycle. Instead, a new program will be developed to incentivize multifamily housing while continuing to disincentivize “mansionization.”</p>
District	Maximum Lot										
I - Hill Section: Ardmore east, Manhattan Beach Blvd. south	15,000 sq. ft.										
II -Tree Section: Ardmore/Blanche east, Manhattan Beach Blvd.south	10,800 sq. ft.										
III - Beach area	7,000 sq. ft.										
IV - El Porto	7,000 sq. ft.										

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Objective:</b> Continue to preserve the character of existing neighborhoods</p> <p><u>*Mansionization occurs when large homes replace historically small homes, on consolidated and standard sized lots, appearing out of scale and resulting in an impression of unrelieved building bulk, screening out light and air and dwarfing existing standard sized buildings in a neighborhood. The consolidation of lots for mansionization results in an inefficient use of land for homes that can only be afforded by affluent households.</u></p>	
<p><b>Program 1b. – Continue to apply the Design Overlay as provided under Section 10.44 of the Municipal Code, as appropriate.</b></p> <p>This section of the Code provides a mechanism for establishing specific development standards and review procedures for certain areas of the City with unique needs, consistent with General Plan policies, taking into consideration the unique nature of a given neighborhood. Seven sub-districts have been established:</p> <ul style="list-style-type: none"> <li>D1) Rosecrans Avenue, where higher fences in the front-yard setback area are needed to reduce traffic noise;</li> <li>D2) 11<sup>th</sup> Street, where limitations on building height and density are needed to minimize building bulk and buffer adjoining residences;</li> <li>D3) Gaslamp neighborhood, where special design standards and review procedures are needed to preserve existing neighborhood character;</li> <li>D4) Traffic noise impact areas, where higher fences are needed to reduce traffic noise;</li> <li>D5) North end commercial, where special design standards are needed to accommodate additional residential development;</li> <li>D6) Oak Avenue, where special design standards, landscaping and buffering requirements are needed to allow commercial use of property in a residential area adjacent to Sepulveda Boulevard;</li> <li>D7) Longfellow Drive area, including residential lots in Tract 14274 located on Longfellow Drive, Ronda Drive, Terraza Place, Duncan Drive and Kuhn Drive, where a special minimum lot area requirement and restriction on subdivision is needed to preserve the character of the neighborhood, including views and privacy.</li> </ul> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Preserve neighborhood character citywide.</p>	<p><b>Progress:</b> Planning staff continues to apply the Design Overlay regulations as a standard part of reviewing plan checks and Planning Entitlements. Furthermore, in 2019, the City adopted the Sepulveda Boulevard Corridor Overlay (D8), enacting more flexible development standards, where needed, to continue to promote desirable development, uses, and economic vitality within the General Commercial (CG) zone.</p> <p><b>Effectiveness:</b> The program successfully enforces specific development standards for each overlay zone while taking into consideration the unique nature of each given neighborhood.</p> <p><b>Appropriateness:</b> This program implements existing Zoning Code without a quantifiable objective. Therefore, it will be replaced by an objective design standards program in compliance with Senate Bill (SB) 330 (2019).</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Program 1c. – Refrain from approval of lot mergers that would result in a reduction in the number of residences allowed.</b>                      Many homes have been constructed on double lots. The City has permitted the underlying subdivision to remain, in order that separate homes may potentially be built on each of the underlying lots. In accordance with Zoning Code Section 10.52.050, accessory structures ancillary to a primary residence may be constructed on an adjacent lot in common ownership without processing a lot merger. Similarly, the City will not require that lots be merged when schools, churches or other similar public assembly uses are constructed on multiple lots. In addition, the maximum lot standards noted above would prevent consolidation of very large lots. This will preserve opportunities for future housing units that would otherwise be lost if lots were consolidated.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Preserve neighborhood character citywide</p>	<p><b>Progress:</b> Implementation continues through enforcement of the existing maximum lot size standards. The City approved a total of 22 lot line consolidations during the planning period.  <b>Effectiveness:</b> The maximum lot size standards are effective in preventing consolidation of multiple smaller lots into a single, larger lot for low-density housing development, and effectively retains existing housing capacity. However, as most parcels in the City are less than 0.5 acres, maximum lot sizes are a constraint for those trying to consolidate lots for multifamily housing.  <b>Appropriateness:</b> Similar to Program 1a, this program is implementing existing development standards without a quantifiable objective. Instead a new program will be developed to incentivize multifamily housing while continuing to disincentivize “mansionization.” Specifically, the program will analyze Zoning Code Section 10.52.050 currently permitting property owners in residential zones to develop contiguous separate lots as one site without requiring a lot merger, and any necessary code amendments to conserve the existing housing stock.</p>
<p><b>Policy 2. Preserve existing dwellings.</b></p>	
<p><b>Program 2a. – Allow non-conforming dwellings to remain and improve.</b>                      Under Zoning Code Section 10.68, the development process for improvements to smaller non-conforming residential structures has been streamlined. Exceptions may be approved administratively to allow additions to non-conforming structures that will not result in total structures in excess of 66 percent of the maximum floor area in Districts III and IV or 75 percent of the maximum floor area in Districts I and II, or 3,000 square feet, whichever is less.                      Non-conforming dwellings may also be improved while maintaining non-conforming, existing parking. For dwellings with less than 2,000 square feet of floor area, only one enclosed parking space is required.                      The non-conforming dwellings to be preserved tend to be smaller and less costly than newer housing in the community. The preservation and improvement of these units will maintain the pool of smaller units which might otherwise be demolished to make way for larger, more costly housing.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund</p>	<p><b>Progress:</b> Planning staff continuously processes Minor Exceptions, which serve to incentivize preservation of smaller, more affordable housing units by allowing minor additions and remodels.  <b>Effectiveness:</b> Since 2014, a total of 198 Minor Exceptions have been processed, demonstrating the effectiveness of the Minor Exception process, which provides a certain amount of flexibility for remodeling and expanding non-conforming residences. It is important to maintain the option of a Minor Exception to incentivize remodeling vs. demolishing and building a new structure.  <b>Appropriateness:</b> Delete. This program is a routine function without a quantifiable objective. Although staff will continue to implement this program through implementation of the existing Planning and Zoning Code, the program will not be carried over to the 6th Cycle Housing Element.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Schedule:</b> On-going  <b>Objective:</b> Preserve smaller, more affordable housing units</p> <p><b>Program 2b. – Utilize Community Development Block Grant funds or exchange funds for home improvement loans for low-income residents, consistent with income limits provided for such funding, and pursue additional sources of funding for City programs.</b>            CDBG funds are exchanged for unencumbered General Funds, which are granted to local public service agencies who provide services for low- and moderate-income residents as well as elderly, disabled, and abused residents. Services include counseling, shelter referral, dental care, case management and groceries for seniors. This allows the City to exceed the 15 percent limit on a locality's CDBG funds that may be passed on to such social service providers.</p> <p>A large proportion of very-low- and low-income homeowners pay over half their income on housing, leaving little for home maintenance or improvement. Many homeowners in the City could not afford to purchase their homes at currently prices, and are "house rich and cash poor," which is not unusual for the region. Long-time residents would be expected to have decades-old mortgages with relatively low payments. Some may have completed their mortgage payments. Thus, as they approach their retirement years on a fixed income, they could continue to afford to live in their current residences. However, major home repairs and rehabilitation could exceed limited budgets.</p> <p>Under this program, a portion of CDBG funds could be utilized to provide small loans or grants for rehabilitation of existing housing or utility under-grounding. Years ago, residents showed little interest in such a program. However, the population has aged, leading to a greater number of residents on fixed incomes. Before initiating any such program, the City will attempt to establish whether interest exists through public solicitation of interest. It would be important to assure residents of full confidentiality, in order not to deter participation.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> CDBG  <b>Schedule:</b> Throughout the planning period.  <b>Objective:</b> Preserve/improve 16 low and moderate income units</p>	<p><b>Progress:</b> Since 2016, the City of Manhattan Beach has used its annual Community Development Block Grant (CDBG) allocation for infrastructure improvements, specifically installation of Americans with Disabilities Act (ADA)–compliant curb ramps throughout City intersections. Most recently, CDBG funds were allocated to support the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, and ADA-compliant curb ramp and gutter to create unobstructed paths of travel and accessibility for older adults and residents with disabilities to Manhattan Senior Villas, located at 1300 Parkview Avenue.</p> <p><b>Effectiveness:</b> Although the funds were not specifically used for rehabilitation of senior housing, they were used for ADA improvements in the right-of-way near the Manhattan Senior Villas. Cities may no longer exchange CDBG funds with another Los Angeles Urban County participating city. Thus, the City no longer supports any public service providers with CDBG funds, directly or indirectly.</p> <p><b>Appropriateness:</b> The program will be carried over and revised to focus on ADA improvements in the City. Construction is anticipated to begin this year for the Manhattan Village Senior Villas ADA improvements. The revised program will subsequently focus on ADA-compliant curb ramp improvements in the City.</p>
<p><b>Goal 2. Provide a variety of housing opportunities for all segments of the community commensurate with the City’s needs, including various economic segments and special needs groups.</b></p>	
<p><b>Policy 3. Provide adequate sites for new housing consistent with the Regional Housing Needs Assessment allocation and the capacity of roadways, sewer lines, and other infrastructure to handle increased growth.</b></p>	

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Program 3a. – Continue to facilitate infill development in residential areas.</b>                      There are very few vacant residential parcels remaining in the City. Development of scattered vacant and underutilized residential infill sites can help to address the need for additional housing units to accommodate the City’s share of regional growth needs.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Increase the supply of housing through infill development</p>	<p><b>Progress:</b> APN 4137002016 (adjacent to 3804 Highland) is still an empty parking lot and remains available for infill development; APN 4137010022 (133 El Porto) is still vacant and remains available for infill development; 1120 6th Street was developed with a single-family residence in 2015.  <b>Effectiveness:</b> With limited vacant lots available for infill development, there are very limited opportunities to increase the supply of housing through infill development. This program could be more effective if it were to focus on redevelopment of underutilized lots, or focused efforts to increase communication with developers.  <b>Appropriateness:</b> Deleted. As mentioned above, the effectiveness of the program is extremely limited by the built-out nature of the City. Other strategies will be implemented for incentivizing development and increasing communication efforts in the City.</p>
<p><b>Program 3b. – Facilitate multi-family residential development in the CL, CD, and CNE commercial districts.</b>                      Provision of housing in commercial and mixed-use areas is a long-time (since 1993) City housing policy. Under Section 10.16.020 of the Municipal Code, exclusive multi-family residential uses are permitted upon the approval of a use permit in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) Districts. Single-family residential development is permitted by-right in the North End Commercial District if located on a site which (1) fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a use permit is required.                      Development of residential and mixed uses in commercial districts can facilitate the delivery of housing. Not only does mixed-use development make additional areas available for residential use, in a mixed-use project the provision of an accompanying commercial use can help absorb some of the fixed costs of development, thereby facilitating the production of lower-cost units. In addition, traffic congestion along with energy consumption and air emissions can be reduced as residents are able to walk to nearby commercial services. This can also enhance the viability of less thriving commercial areas.</p>	<p><b>Progress:</b> The objective of this policy to streamline the application process for residential or mixed-use projects in the CL, CNE, and CD zoning districts was not accurately fulfilled as a part of the code amendments that followed adoption of the 5th Cycle Housing Element. Although Precise Development Plans (PDPs) and Site Development Permits (SDPs) were introduced in the residential zoning districts to streamline the application process for residential projects on residentially zoned lots, the permitted land uses table in Title 10.16 for commercial zones was not amended and still reflects the requirement for use permits for multifamily and mixed-use projects. In addition, the current PDP process involves findings and conditions of approval.  <b>Effectiveness:</b> The intent of the lot consolidation portion of the program is effective (examples include 401 Rosecrans and 1701 Artesia) and will be carried forward and correctly implemented via future code amendments. The City will evaluate whether a consistent approach to SDPs and PDPs in the residential and commercial zones is preferred.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness								
<p>To enhance opportunities for residential development commensurate with the City’s share of lower-income regional need of 16 units, the following incentives have been established for affordable multi-family development within the Downtown Commercial, Local Commercial, and North End Commercial districts:</p> <ol style="list-style-type: none"> <li>1. Owner-occupied and rental multi-family housing developments that qualify for a density bonus under Government Code Sec. 65915 are permitted within these districts subject only to a non-discretionary Precise Development Plan controlling project design. Projects with 5 units or less are reviewed by the Director and projects with 6 units or more are reviewed by the Planning Commission. Other non-affordable residential developments with 6 or more units within these zones will continue to require approval of a Site Development Permit (see also Program 5b).</li> <li>2. The City will facilitate consolidation and development of small parcels through the following actions: <ul style="list-style-type: none"> <li>• Assist affordable housing developers in identifying opportunities for lot consolidation using the City’s GIS system and property database;</li> <li>• Provide a graduated density bonus for lower-income housing developments that consolidate small parcels into a larger building site according to the following formula:</li> </ul> <table border="1" data-bbox="113 894 1157 1047"> <thead> <tr> <th>Combined Parcel Size</th> <th>Base Density Increase*</th> </tr> </thead> <tbody> <tr> <td>Less than 0.50 acre</td> <td>No increase</td> </tr> <tr> <td>0.50 acre to 0.99 acre</td> <td>5% increase</td> </tr> <tr> <td>1.00 acre or more</td> <td>10% increase</td> </tr> </tbody> </table> <p>*Excluding density bonus</p> <ul style="list-style-type: none"> <li>• Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments;</li> <li>• Publicize the program on the City’s website, at the Planning counter, and by notice to affordable housing providers.</li> </ul> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Throughout the planning period.  <b>Objective:</b> Provide adequate sites to accommodate the City’s lower-income RHNA allocation</p> </li> </ol>	Combined Parcel Size	Base Density Increase*	Less than 0.50 acre	No increase	0.50 acre to 0.99 acre	5% increase	1.00 acre or more	10% increase	<p><b>Appropriateness:</b> This program will be revised and separated into three programs related to streamlined development, lot consolidation incentives, and developer outreach and transparency consistent with Assembly Bill 1483, as follows:</p> <ul style="list-style-type: none"> <li>• Removing discretionary actions related to PDPs to create a truly administrative non-discretionary approval process.</li> <li>• Permitting multifamily housing in the CL, CD, and CNE zones as intended by the 5th Cycle program, including a streamlined approval process for projects that qualify for a density bonus under State law.</li> <li>• Adopting development standards for multifamily residential and mixed-use projects in the three commercial zones (CL, CD, and CNE).</li> </ul>
Combined Parcel Size	Base Density Increase*								
Less than 0.50 acre	No increase								
0.50 acre to 0.99 acre	5% increase								
1.00 acre or more	10% increase								



**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Program 3c. – Continue to provide for a mixture of uses in the Manhattan Village area.</b>                      The Manhattan Village area contains a mix of hotel, office, research and development, retail, recreation and residential uses, including senior housing. The existing parking lot at Parkview Avenue and Village Drive could accommodate up to 25 additional residential units similar to the existing senior project. This site was identified as a potential housing site in the 2003 Housing Element, consistent with the more general 1993 Housing Element program calling for a mixture of uses in the Manhattan Village area.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> 25 senior units</p>	<p><b>Progress:</b> A mixture of uses in Manhattan Village continues to be maintained. The parking lot has not been redeveloped to date.</p> <p><b>Effectiveness:</b> Although the opportunity for a mixture of uses in Manhattan Village remains, future development is market-driven, and there has been no interest expressed in developing the parking lot to date. The program will continue to extend opportunities for residential and mixed-use development in this area.</p> <p><b>Appropriateness:</b> A large portion of the Manhattan Village area was recently redeveloped as part of a \$250 million expansion, and renovation of the Manhattan Village Mall is expected to be fully completed by the end of 2021. Any potential sites within the Manhattan Village that remain with potential for redevelopment in the 6th Cycle have been included in the new Adequate Sites program and in Appendix E, Sites Analysis and Inventory, of the 6th Cycle Housing Element.</p>
<p><b>Program 3d. – Ensure that development standards for residential uses in the CD and CNE Districts do not pose unreasonable constraints to housing.</b>                      The City will review current development standards and evaluate the feasibility of a Code amendment to eliminate the maximum number of units per lot, so long as the otherwise maximum physical dimensions of the allowable building envelope are not exceeded in mixed-use commercial/residential developments. Greater numbers of smaller units could result, with likely occupants being young people and seniors wanting easy access to commercial uses, particularly seniors who no longer feel comfortable driving. The review of development standards will also examine parking requirements for residential and mixed-use developments in commercial districts. Under existing codes, parking spaces located within the Downtown Commercial (CD) district may serve as required parking for a nonresidential use located within the same district at a maximum distance of 1,000 feet. No parking for commercial uses is required at all if the floor area ratio does not exceed 1:1. The same is not permitted for residential uses. In order to facilitate development of residential uses, residential and commercial uses could be treated equally for parking purposes, if the residential units are a small size and the City concludes that it does not burden the District.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund</p>	<p><b>Progress:</b> Staff are currently evaluating parking regulations in an attempt to “modernize” parking requirements and bring requirements into conformance with current industry standards using ULI and ITE ratios. Staff anticipate parking requirements being updated within the next year. However, the parking requirements being evaluated are focused on nonresidential uses. In addition, development standards for residential and mixed-use developments in commercial districts, including in the CD and CNE zones, defer to the High-Density Residential District (RH) zone’s development standards.</p> <p><b>Effectiveness:</b> The program will be carried forward because staff has only seen partial progress on this effort.</p> <p><b>Appropriateness:</b> This program will be revised to include the CL zone and to adopt development standards for multifamily residential and mixed-use projects in the three commercial zones (CL, CD, and CNE) permitting mixed uses.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Schedule:</b> Review development standards and process a Code amendment by December 2014</p> <p><b>Objective:</b> Facilitate development of affordable multi-family and mixed use developments</p>	
<p><b>Program 3e. – No Net Loss</b></p> <p>To ensure adequate sites are available throughout the planning period to meet the City’s RHNA, the City will continue to annually update an inventory that details the amount, type, and size of vacant and underutilized parcels to assist developers in identifying land suitable for residential development and that also details the number of extremely low-, very low-, low-, and moderate-income units constructed annually. If the inventory indicates a shortage of available sites, the City shall rezone sufficient sites to accommodate the City’s RHNA.</p> <p>To ensure sufficient residential capacity is maintained to accommodate the RHNA need, the City will continue to implement project-by-project evaluation pursuant to Government Code Section 65863. Should a development proposal result in a reduction of yield below the residential capacity identified in the sites inventory, the City will identify and zone sufficient sites to ensure no net loss in residential capacity.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> City General Fund</p> <p><b>Schedule:</b> Continue to implement Government Code Section 65863</p> <p><b>Objective:</b> Ensure no net loss of housing capacity throughout the planning period.</p>	<p><b>Progress:</b> As part of the annual reporting process, the City continued to monitor site capacity and the net remaining RHNA. No net loss of housing capacity occurred during the planning period; therefore, no rezoning of sites stemming from net loss occurred.</p> <p><b>Effectiveness:</b> This program is effective and necessary, and required by State law; therefore, it is appropriate to carry forward.</p> <p><b>Appropriateness:</b> Continue. Revise as needed to comply with current State law.</p>
<p><b>Policy 4. Preserve the existing affordable housing stock.</b></p>	
<p><b>Program 4. – Regulate the conversion of rental housing to condominiums.</b></p> <p>Section 10.88.080 of the Municipal Code requires that potential displacement of existing tenants be taken into consideration when evaluating requests for conversion of existing rental units to condominium status. In addition, under Section 10.88.070, tenants must be given first right of refusal to purchase at discounted prices. Those tenants who do not wish to purchase must be provided relocation assistance. Elderly and handicapped tenants must be provided life leases, with no rent increases for at least two years, and low- and moderate-income tenants and families must be given at least one year to relocate. These programs help to reduce the impact of condominium conversion on low- and moderate-income households.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> City General Fund, condominium application fees</p> <p><b>Schedule:</b> On-going</p>	<p><b>Progress:</b> Implementation of these regulations continued through the 5th Cycle.</p> <p><b>Effectiveness:</b> No affordable units were converted to condominiums during the 5th Cycle. Program is effective and should continue.</p> <p><b>Appropriateness:</b> Revise to focus on replacement requirements for all housing types in accordance with SB 330 (2019).</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Objective:</b> Preserve 12 affordable units</p>	
<p><b>Policy 5. Encourage the development of additional low- and moderate-income housing.</b></p>	
<p><b>Program 5a. – Provide incentives for housing affordable to low-income households and senior housing.</b>                      Section 10.52.090 of the Municipal Code provides for density bonus or other incentives when low-income housing is provided, in accordance with Section 65915 of the California Government Code. The housing must remain affordable for at least 30 years. The City will continue to implement the Density Bonus ordinance in conformance with state law.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Ongoing implementation of the Density Bonus ordinance.  <b>Objective:</b> Additional affordable housing units commensurate with the City’s RHNA allocation</p>	<p><b>Progress:</b> The City continues to incentivize development of affordable housing by abiding by the local and State density bonus regulations. The density bonus requires updating to attain compliance with current State regulations.</p> <p><b>Effectiveness:</b> Two density bonus projects are in the planning process currently (401 Rosecrans and 1701 Artesia).</p> <p><b>Appropriateness:</b> Revise accordingly to comply with current density bonus requirements (Assembly Bill 1763/SB 2263).</p>
<p><b>Program 5b. – Streamline the development process to the extent feasible.</b>                      The City currently allows and encourages concurrent processing of all discretionary applications for a project, thereby streamlining the development process. Many routine applications may be processed as minor exceptions instead of the longer and more difficult variance process. As discussed in Chapter 4 regarding governmental constraints, processing time for building permits in the City compares favorably with other nearby jurisdictions. To minimize constraints to multi-family development, projects with up to 5 units are approved by the Director through an Administrative Site Development Permit with no public hearing, and a Site Development Permit approved by the Planning Commission is required for projects with more than 5 units. Both the Administrative SDP and the Planning Commission SDP review processes are limited to confirming that the project complies with applicable development standards and does not examine the appropriateness of the use itself.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Throughout the planning period.  <b>Objective:</b> Streamline the development review process for multi-family development.</p>	<p><b>Progress:</b> While certain streamlined processes are currently in place, with examples being the SDP and PDP processes for residential projects in residential zones, other streamlining efforts originally identified in the 5th Cycle Housing Element were not codified properly. To date, the SDP and PDP processes have not been extended in the Planning and Zoning Code to the CL, CNE, and CD zoning districts as originally intended in Policy 3 of the 5th Cycle Housing Element, and mixed-use projects are clearly depicted as a residential use, to which streamlined processes apply per State law.</p> <p><b>Effectiveness:</b> The streamlined permitting option is effective, and the Zoning Code should be amended to accurately reflect the policies in the Housing Element.</p> <p><b>Appropriateness:</b> This program is not appropriate to continue. Revisions to Program 3b will address codifying the approval processes for residential uses in the CL, CNE, and CD zoning districts. Instead, a new program will be included in the 6th Cycle to include SB 35 (2017) streamlining in staff permitting process procedures.</p>
<p><b>Program 5c. – Allow the establishment of manufactured housing on single-family residential lots.</b>                      Manufactured housing can be constructed for much less than the cost of traditional building. Building various standardized modules in one location results in savings due to</p>	<p><b>Progress:</b> The Municipal Code continues to accommodate manufactured housing.</p> <p><b>Effectiveness:</b> No permits have been requested or granted for this type of residential structure during this planning period. Currently,</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>economies of scale and greatly reduced waste of building materials. Factory-built housing designed for placement on fixed foundations can be highly attractive and virtually indistinguishable from standard construction. In addition, current factory-built housing is typically built to higher standards for energy conservation.</p> <p>In accordance with Section 10.52.100 of the Municipal Code, manufactured housing is permitted on single-family lots not occupied by another dwelling. The housing must be secured, must meet certain design criteria, and must be on a relatively flat slope. These criteria are not unduly burdensome and would not prevent the establishment of manufactured housing on residential lots.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> City General Fund</p> <p><b>Schedule:</b> Ongoing.</p> <p><b>Objective:</b> Continue to facilitate development of manufactured housing as a means of reducing housing cost.</p>	<p>the City permits manufactured homes in any residential district where a single-family detached dwelling is permitted, subject to the same restrictions on density and to the same property development regulations, provided that such manufactured home receives a Certificate of Compatibility.</p> <p><b>Appropriateness:</b> Revise to allow manufactured homes in all of the same zone(s) as conventional or stick-built structures are permitted (Government Code Section 65852.3), including commercial or mixed-use zones subject to the same development standards that a conventional single-family residential dwelling on the same lot would be subject to, with the exception of architectural requirements for roof overhang, roofing material, and siding material (Government Code Section 65852.3(a)).</p>
<p><b>Program 5d. – Work with the private sector to facilitate the provision of low-and moderate-priced housing.</b></p> <p>This is a continuation and expansion of the Developer Consultation Program included in the 2003 Housing Element. In the past, the City worked with the private sector to produce two residential projects available to low- and moderate-income households. The Manhattan Terrace development received a certificate of occupancy in July 1991. The City approved a use permit to allow this senior citizen project at 3400 Valley Road. This 48-unit project contains 540-square-foot units with rents at affordable levels. A 104-unit senior project was completed at Manhattan Village on Parkview Avenue in 1997. This project provides housing affordable to very-low- and moderate-income households along with market-rate housing. The City approved a zoning amendment to allow higher density and reoriented a City recreation facility in order to facilitate development of the project.</p> <p>To increase the likelihood of additional affordable housing development during the planning period, the City will take the following actions:</p> <ul style="list-style-type: none"> <li>• Assist developers in identifying suitable sites for affordable housing</li> <li>• Provide fast-track processing</li> <li>• Provide density bonus, modified development standards and other concessions</li> <li>• Prioritize funding for projects that include extremely-low-income units</li> <li>• Reduce development fees if feasible</li> <li>• Provide administrative assistance with grant funding applications</li> </ul>	<p><b>Progress:</b> Planning staff has continued to educate private developers regarding the incentives, opportunities, and streamlined processes available in the City code for the development of projects that include affordable units. Examples include the project at 401 Rosecrans and the project at 1701 Artesia.</p> <p><b>Effectiveness:</b> The program is effective in that one density bonus project is currently in review and a second is pending submittal. Carry forward.</p> <p><b>Appropriateness:</b> Revise to comply with Assembly Bill 1483 transparency requirements.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Meet with interested affordable housing developers when opportunities arise.  <b>Objective:</b> Facilitate the production of new affordable units commensurate with the City’s RHNA allocation</p>	
<p><b>Program 5e. – Allow second units in residential areas.</b>            Section 65852.2 of the California Government Code provides for the establishment of second units subject to certain limitations as a means of increasing housing stock. Absent a local ordinance specifying development standards, the provisions of State law apply. The City does not currently have a local ordinance regarding second units, therefore a Code amendment will be processed in conformance with state law.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> City General Fund  <b>Schedule:</b> Adopt a Second Unit ordinance by December 2014  <b>Objective:</b> Encourage production of second units</p>	<p><b>Progress:</b> An interim Accessory Dwelling Unit (ADU) Ordinance was in place through 2020 in accordance with updated State laws. The City’s current ADU Ordinance and the associated Local Coastal Program amendment are currently under review by the California Coastal Commission. The current ADU Ordinance contains provisions that go beyond those set forth in State law.  <b>Effectiveness:</b> The program has proven to be effective. In 2017, 2018, and 2019, three ADU permits were issued and constructed. From January 2020 to date, the City has issued 11 permits, and 22 applications are currently under City review.  <b>Appropriateness:</b> Update program to include a quantifiable objective based on recent ADU trends, to continue compliance with current State ADU laws, and to develop a plan to incentivize and promote the creation of ADUs that can be offered at affordable rent for very low-, low-, or moderate-income households in accordance with Assembly Bill 671 (2019).</p>
<p><b>Policy 6. Encourage means of increasing ability to afford existing housing stock.</b></p>	
<p><b>Program 6a. – Continue to participate in Los Angeles County Housing Authority programs, and publicize availability of Section 8 rental assistance for households in the City.</b>            Section 8 rental assistance is provided by the United States Department of Housing and Urban Development (HUD) and is administered locally by the Los Angeles Community Development Commission (CDC) operating as the Housing Authority of the County of Los Angeles. Under this program, low-income households are provided the differential between the rental rate of a unit and what they can afford. The rental rate cannot exceed fair market rent for the area as established by HUD.  <b>Responsibility:</b> Los Angeles Community Development Commission; Publicized by City Community Development Department  <b>Funding:</b> Federal Section 8 funds</p>	<p><b>Progress:</b> The Redondo Beach Housing Authority administers the Section 8 Rental Assistance Program for the City. Currently, there are five Section 8 vouchers administered in the City. There are various internet resources dedicated to advertising Section 8 housing units in many jurisdictions. Due to limitations in resources, the City periodically monitors the internet to ensure that dwelling units accepting the Section 8 program are visible.  <b>Effectiveness:</b> Staff continues to publicize availability of resources when requested. Can continue the program and enhance the City’s website with information.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Schedule:</b> Ongoing. Publicize to landlords and tenants via City newsletter, link on City website or other means.</p> <p><b>Objective:</b> Facilitate rent subsidies for very-low- and extremely-low-income residents through Section 8 vouchers.</p>	<p><b>Appropriateness:</b> Update program to include a quantifiable objective and enhance City’s website.</p>
<p><b>Policy 7. Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color, and for special needs groups.</b></p>	
<p><b>Program 7a. – Continue to participate in area-wide programs to ensure fair housing.</b> The City will continue to contract with Fair Housing organizations to process complaints regarding housing discrimination within the City, and to provide counseling in landlord/tenant disputes.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General fund/CDBG</p> <p><b>Schedule:</b> Ongoing, annual review</p> <p><b>Objective:</b> Address 100 percent of fair housing complaints</p>	<p><b>Progress:</b> The City contracts with the Housing Rights Center and continues to disseminate its contact information when fielding associated complaints. The Housing Rights Center assisted the following number of residents each fiscal year during the 5th Cycle with discrimination inquiries and tenant/landlord services related to general housing issues, including eviction, tenant/landlord general information, lease terms, notices, repairs, security deposits, substandard conditions, and utilities:</p> <ul style="list-style-type: none"> <li>• 2014–2015: 14 residents</li> <li>• 2015–2016: 11 residents</li> <li>• 2016–2017: 15 residents</li> <li>• 2017–2018: 14 residents</li> <li>• 2018–2019: 16 residents</li> <li>• 2019–2020: 6 residents</li> <li>• 2020–2021: 12 residents</li> </ul> <p>Total: 88 residents*</p> <p>*See additional details in Appendix D, Affirmatively Furthering Fair Housing.</p> <p><b>Effectiveness:</b> All housing-related complaints are directed to the Housing Rights Center.</p> <p><b>Appropriateness:</b> The program is effective and will be revised to support and engage in the Regional Analysis of Impediments to Fair Housing, develop outreach material related to fair housing practices for developers, and create a procedure that prompts fair housing administration for development decisions.</p>
<p><b>Program 7b. – Provide for the housing needs of seniors.</b> The Manhattan Village Senior Villas, located at 1300 Park View Avenue, was first occupied in 1997. This project consists of 104 senior housing apartments. As a condition of the project's approval, 20% of the units must be reserved for very-low income</p>	<p><b>Progress:</b> All 81 affordable units have been preserved during this planning period.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>households, 20% must be reserved for low-income households, and 40% of the units must be reserved for moderate-income households. The remainder (20%) of the units may be rented at a market-rate. The occupants of the senior housing project must consist of a householder 62 years of age or older, or 55 years of age or older if handicapped, according to criteria established by the Americans With Disabilities Act (ADA) of 1990 or the Federal Rehabilitation Act of 1973. This program is concerned with ensuring that the current affordability of the project is being maintained.</p> <p>Implementation: No additional funding and/or staffing will be required or are anticipated with this program's continued implementation. The City will continue to inform the public of this program.</p> <p><b>Responsibility:</b> California Housing Finance Agency</p> <p><b>Funding:</b> State of California</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> Preserve 81 affordable senior units</p>	<p><b>Effectiveness:</b> The program is effective, as the City has experienced zero loss of affordable units, and will continue.</p> <p><b>Appropriateness:</b> While the project’s affordability agreement with the City does not expire, the program will be revised to include that the City should make contact with the owners of Manhattan Village Senior Villas, and continue to monitor and enforce affordability throughout the planning period.</p>
<p><b>Program 7c. – Provide for the special needs of seniors so that they may remain in the community.</b></p> <p>The Senior Care Management program provides services to predominantly low-income seniors. This program is operated by a part-time Senior Services Care Manager who is contracted through the Beach Cities Health District and the City of Manhattan Beach Fire Department. At any given time, the Senior Services Program may assist up to 110 senior citizens, of whom 70% are low-income. As liaison and service coordinator, the Senior Services Care Manager performs the following functions:</p> <ol style="list-style-type: none"> <li>1. Locates suitable (often more affordable) housing. This may include referrals to "board and care" residential facilities in Manhattan Beach, or multi-family apartments;</li> <li>2. Identifies financial assistance resources, including HUD Section 8 rental vouchers through Los Angeles County, and other federal assistance programs, as well as disbursing information and referring to lenders for special mortgage programs;</li> <li>3. Coordinates "Rotary Cares," a volunteer program, which rehabilitates two senior homes per year, consisting of minor repairs, plumbing, carpentry, painting, etc.,</li> <li>4. Arranges and makes referrals for health and personal services for the Senior Health Program, which is funded by the Beach Cities Health District "Community Care Services" and other community resources available for older adults; and,</li> </ol>	<p><b>Progress:</b> The City continues to contract with Beach Cities Health District for Care Management needs (<a href="https://www.bchd.org/home-services-care-management">https://www.bchd.org/home-services-care-management</a>).</p> <p>Additionally, the Parks and Recreation Department has a full-time Older Adults Program Supervisor, plus support staff, who provides these services and numerous programs to older adults (<a href="https://www.manhattanbeach.gov/departments/parks-and-recreation/older-adults-program">https://www.manhattanbeach.gov/departments/parks-and-recreation/older-adults-program</a>).</p> <p>In 2020, the City re-focused its efforts on ensuring that vulnerable older adults were connected with assistance in receiving essential items by establishing a Senior Hotline. From April 2020 through May 2021 there were 1,009 callers to the Senior Hotline. The callers received information and referrals, and many were connected to the volunteers with community partners like the Community Emergency Response Team, Rotary, and the Beach Cities Health District for help with the delivery of essential items like groceries, household items, and prescriptions. The City also offers Dial-a-Ride services. Although Dial-a-Ride services were limited during 2020 and 2021, there are 1,211 Dial-a-Ride riders.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>5. Informs eligible low-income seniors of state and utility company programs (Southern California Edison and Southern California Gas Company) regarding discounts, weatherization services, and payment assistance.</p> <p>As discussed above, it is suggested that a shared housing program also be established, expanding responsibilities under No. 1 above. The City also provides funds for social service groups serving seniors, including the Salvation Army brown bag food program, Care Management for Manhattan Beach Seniors, and South Bay Adult Care Center.</p> <p><b>Responsibility:</b> Fire Department/Senior Services Care Manager  <b>Funding:</b> General Fund/Beach Cities Health District/CDBG Funds  <b>Schedule:</b> On-going; add shared housing program in 2014  <b>Objective:</b> Maintain part-time Senior Services Care Manager</p>	<p><b>Effectiveness:</b> This program is effective and should be continued. The older adults of the community regularly rely on these resources for services and programming.</p> <p><b>Appropriateness:</b> The program remains appropriate and will be continued, with revision to the funding sources.</p>
<p><b>Program 7d. – Reasonable accommodation for persons with disabilities.</b>  Pursuant to SB 520, the City will continue to implement the Municipal Code procedures for reviewing and approving requests for reasonable accommodation in housing from persons with disabilities and monitor the results of the program as part of the annual General Plan report.</p> <p><b>Responsibility:</b> Community Development Department  <b>Funding:</b> General Fund  <b>Schedule:</b> Throughout the planning period  <b>Objective:</b> Continue to implement procedures for ensuring reasonable accommodation</p>	<p><b>Progress:</b> The City continues to implement Reasonable Accommodation policies, and received and approved one request during the planning period.</p> <p><b>Effectiveness:</b> The program is effective and should be continued.</p> <p><b>Appropriateness:</b> Program will be revised to remove any potential constraints related to the approvals process in the City’s Reasonable Accommodation Ordinance.</p>
<p><b>Program 7e. – Emergency shelters and transitional/supportive housing.</b>  The Zoning Code allows emergency shelters “by-right” subject to appropriate development standards consistent with SB 2 in the Public &amp; Semi-Public (PS) and Industrial Park (IP) zones. These zones include vacant and underutilized parcels that could support emergency shelters. Sites in this zone also have good access to transit and other services.</p> <p>Transitional housing is defined in <i>Health and Safety Code</i> Section 50675.2 as rental housing for stays of at least six months but where the units are re-circulated to another program recipient after a set period. Transitional housing may be designated for a homeless individual or family transitioning to permanent housing. Transitional housing that is group housing for six or fewer persons is permitted by-right as a regular residential use where residential use is permitted. Transitional housing that is group housing for seven or more persons is conditionally permitted as residential care facilities in RM and RH zones. Transitional housing not configured as group housing as described</p>	<p><b>Progress:</b> The Zoning Code includes provisions for emergency shelters and transitional/supportive housing. No emergency shelter or transitional/supportive housing applications were submitted during the planning period.</p> <p><b>Effectiveness:</b> The City should continue to facilitate the program and make these options available in the event that an application is submitted.</p> <p><b>Appropriateness:</b> Revise to comply with current State law, including adding Low-Barrier Navigation Center requirements.</p>



**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>above is permitted as a residential use subject to the same permitting processes and requirements as other similar housing types in the same zones.</p> <p>Supportive housing is permanent housing with an on- or off-site service component. Supportive housing that is group housing for six or fewer persons is permitted by-right as a regular residential use where residential use is permitted. Supportive housing that is group housing for seven or more persons is conditionally permitted as residential care facilities in RM and RH zones. Supportive housing not configured as group housing is permitted as a residential use subject to the same permitting processes and requirements as other similar housing types in the same zones.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General Fund</p> <p><b>Schedule:</b> Throughout the planning period</p> <p><b>Objective:</b> Continue to facilitate the provision of emergency shelters, transitional and supportive housing in compliance with SB 2. Program results will be monitored as part of the annual General Plan Progress report.</p>	
<p><b>Goal 3. Provide a safe and healthy living environment for City residents.</b></p>	
<p><b>Policy 8. Eliminate potentially unsafe or unhealthy conditions in existing residential development.</b></p>	
<p><b>Program 8a. – Continue the active code enforcement program for illegal and substandard units.</b></p> <p>The City has an active Code enforcement program that responds to complaints of substandard structures. In addition, a Report of Residential Building Records is required each time a property is sold, which serves to alert all parties to unpermitted and potentially substandard construction that may exist.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General Fund</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> Respond to 100 percent of reports of substandard units</p>	<p><b>Progress:</b> The City continued to investigate 100% of reports of code violations and substandard housing. Residential Building Records reports continue to be required with each property sale.</p> <p><b>Effectiveness:</b> Both components of this program are effective and will be continued.</p> <p><b>Appropriateness:</b> Continue and incorporate Code Enforcement’s efforts related to substandard housing conditions, and related resources for residents related to attenuation of those issues.</p>
<p><b>Goal 4. Encourage the conservation of energy in housing.</b></p>	
<p><b>Policy 10. Encourage the use of alternate energy.</b></p>	
<p><b>Program 10. – Waive fees for installation of solar panels.</b></p> <p>Solar panels may be used on roofs of residential and commercial structures to generate electricity that is either transmitted to the grid or stored in batteries on-site. The existing height limits in Manhattan Beach ensure rooftop units would not eventually be subject to shade and shadow, which would render them ineffective.</p>	<p><b>Progress:</b> Solar permits are subsidized by the City. The current permit fee for solar panels is \$100. During the planning period, the City issued over 800 solar permits.</p> <p><b>Effectiveness:</b> The program is effective and should be continued.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p>Since 2008, in order to encourage use of alternate energy the City has waived any building fees for photovoltaic panels.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General Fund</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> Process permits for new solar panels at no cost.</p>	<p><b>Appropriateness:</b> Continue; program remains appropriate.</p>
<p><b>Policy 11. Reduce energy loss due to inferior construction/development techniques.</b></p>	
<p><b>Program 11a. – Enforce green building techniques.</b></p> <p>The City has adopted the California Energy Code. In addition, the City requires the following:</p> <ul style="list-style-type: none"> <li>• Insulating hot water pipes to minimize energy loss</li> <li>• Using caulk and insulation that are formaldehyde-free or contain low VOC (volatile organic compounds)</li> <li>• Pre-plumb water piping and sensor wiring to the roof for future solar water heating</li> <li>• Use duct mastic on all duct joints and seams to minimize energy loss</li> <li>• Install "Energy Star" bath fans vented to the outside</li> <li>• Energy efficient water fixtures</li> </ul> <p>The City continues to review its codes to encourage greener building techniques. The United States Green Building Council continues to review more intensive measures to be included in buildings for LEED certification. The City reviews standards through the Environmental Task Force and will continue to review and update its codes as updates become available.</p> <p><b>Responsibility:</b> Community Development Department</p> <p><b>Funding:</b> General Fund</p> <p><b>Schedule:</b> On-going</p> <p><b>Objective:</b> 100 percent compliance for new units</p>	<p><b>Progress:</b> The City continues to implement this program. In 2019, the City adopted the 2019 California Green Building Standards Code and the 2019 California Energy Code, which continue to be in effect through today. Furthermore, the City Council has expressed interest in pursuing green building techniques above and beyond State requirements, a task currently being undertaken by the City’s Sustainability Division.</p> <p><b>Effectiveness:</b> 100% of projects are required to comply with the adopted codes. The City is preparing to update the codes in the next 2 years in accordance with anticipated State code updates.</p> <p><b>Appropriateness:</b> Continue; program remains appropriate.</p>
<p><b>Program 11b. –Encourage water conservation.</b></p> <p>Massive amounts of energy are utilized in pumping water to southern California. Any measures to conserve water will therefore help conserve energy. This can be achieved through use of low-flow fixtures and use of drought-tolerant landscaping. Sections 7.32 and 10.52.120 of the Municipal Code address landscaping, tree preservation, tree planting, and drought-tolerant landscaping. City codes provide for waterless urinals. Similar to solar panels, inspection and permit fees for installation of such urinals should be waived, when they are used to replace older, water-wasting urinals.</p> <p><b>Responsibility:</b> Community Development Department</p>	<p><b>Progress:</b> Water conservation requirements apply to 100% of projects that the City approves. Water conservation requirements are built into Title 9 via the Green Building Code, and Title 10 via State Water Efficient Landscape Ordinance requirements.</p> <p><b>Effectiveness:</b> The program is effective and should be continued. The City anticipates State Green Building Codes being updated in the next 2 years, at which point the City will also update its regulations.</p>

**Table 1. Evaluation of Previous Housing Element Implementation**

Policy	Progress/Effectiveness/Appropriateness
<p><b>Funding:</b> General Fund  <b>Schedule:</b> On-going  <b>Objective:</b> Reduced water consumption</p>	<p><b>Appropriateness:</b> Continue; program remains appropriate.</p>
<p><b>Policy 12. Encourage reduction in energy consumption for commuting to work and other activities.</b></p>	
<p><b>Program 12 – Provide a balance of residential and employment-generating uses in the City, including mixed-use projects.</b>            Where individuals have an opportunity to live in close proximity to their work, vehicle miles traveled to and from work can be reduced, thus reducing energy consumption. The City has permitted the development of mixed uses in Manhattan Village and permits the development of residential uses in commercial districts downtown and along Manhattan Beach Boulevard. In addition, the commercial areas of the City are in close proximity to residential districts, thus providing the potential that residents may walk to work or to shopping, dining out or other activities, or only drive a short distance.  <b>Responsibility:</b> Community Development Department  <b>Funding:</b> General Fund  <b>Schedule:</b> On-going.  <b>Objective:</b> Continue to encourage mixed use projects</p>	<p><b>Progress:</b> Mixed-use continues to be allowed in various zoning districts within the City. General Plan Land Use Element policies regarding mixed-use continue to encourage this type of development.  <b>Effectiveness:</b> Three mixed-use projects were approved during the planning period. However, this program does not have a quantifiable objective. Instead the City will commit to increasing opportunities for mixed-use development through the Adequate Sites program, and by clarifying and creating multifamily and mixed-use streamlined permitting procedures and development standards.  <b>Appropriateness:</b> The program will be replaced with an Adequate Sites program to increase the opportunities in the City for mixed-use and multifamily development in the mixed-use zones (CL, CD, CNE).</p>

The California Department of Housing and Community Development identifies the total number of homes for which each region in California must plan in order to meet the housing needs of people at all income levels for each planning period. Every local government is allocated a portion of the region’s housing needs, or RHNA, by their associate of governments. The City’s RHNA for the 5th Cycle planning period and the City’s progress in achieving the housing need’s objectives is provided in **Table 2**.

Table 2. Progress in Achieving Objectives for 5th Cycle RHNA (2014–2021)		
Program Category	5th Cycle RHNA (number of units)	Progress 2013–2020
New Construction*		
Extremely Low-Income	5	—
Very Low-Income	5	—
Low-Income	6	—
Moderate-Income	7	—
Above Moderate-Income	15	419
<b>Total</b>	<b>38</b>	<b>419</b>
<small>RHNA = Regional Housing Needs Allocation            * Quantified objective and progress for new construction reflect the 2013–2021 period, consistent with the previous RHNA cycle, through December 2020.</small>		

## 2.1 Review of Programs Addressing the Housing Needs for the Population with Special Needs

The City’s 5th Cycle Housing Element included several programs to directly address housing for those with special needs and many programs that indirectly support housing for those with special needs.

Program 2b of the 5th Cycle directly supported older adults and those with disabilities in the community. Program 2b was specifically focused on securing and using Community Development Block Grant (CDBG) funds or exchange funds for home improvement loans for low-income residents. Although it was not directly successful in achieving the objective tied to home improvement loans, the program was very successful in using CDBG funds to fund improvements for older adults and people with disabilities. The City used its CDBG allocation to fund infrastructure improvements, specifically installation of Americans with Disabilities Act (ADA)-compliant curb ramps throughout various City intersections. Most recently, CDBG funds were allocated to support the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, and ADA-compliant curb ramp and gutter to create unobstructed paths of travel and accessibility for older adults and residents with disabilities to Manhattan Senior Village Villas.

The City recognizes that many existing non-governmental constraints, such as the small parcel sizes and built-out nature of the City, may act as a barrier to development for housing needed to serve the population with special needs. However, the City implemented several programs from the 5th Cycle Housing Element that were successful in mitigating barriers and helping to address the housing needs of the populations with special needs. Specifically, through implementation of Program 5a – Provide incentives for housing affordable to low-income households and senior housing, the City continued to

incentivize development of affordable housing by abiding by the local and State density bonus regulations. Additionally, through the lot consolidation incentive through Program 3b – Facilitate multi-family residential development in the CL, CD, and CNE commercial districts, the City provided an additional density bonus incentive under Section 10.12.030 of the Manhattan Beach Municipal Code above and beyond what is permitted under State law in exchange for lot consolidation. Currently one density bonus project is in review and a second is pending submittal, including several very low-income units, helping to increase housing opportunities for some of the households that may be most vulnerable to facing worst-case needs.<sup>1</sup>

In addition, several programs, including Program 5b – Streamline the development process to the extent feasible, aimed to provide a streamlined approval process as a means of facilitating a variety of housing types that may be suitable for people with special needs. The programs were effective in providing a streamlined approval process for residential projects that qualify for a density bonus under State density bonus law, further incentivizing housing for those with special needs, including older adults, extremely low-income households, and lower-income students. While not all components of the programs were fully implemented, the City is carrying forward several of those components and committing to implement them during the 6th Cycle.

The City's 5th Cycle Housing Element also included several programs to allow for a variety of housing types that can provide housing opportunities for those with special needs, including Program 5c – Allow the establishment of manufactured housing on single-family residential lots, Program 5e – Allow second units in residential areas, and Program 7e – Emergency shelters and transitional/supportive housing. In particular, Program 5e included a Zoning Code amendment to adopt a local Accessory Dwelling Unit Ordinance. Accessory dwelling units can provide opportunities for those with special needs, such as older adults or people with disabilities, including developmental disabilities, by creating housing that is in an independent setting while still allowing for support from caregivers who reside on the same lot. The program has proven to be very effective. While three accessory dwelling unit permits were issued and constructed 2017 through 2019, from January 2020 to October 2021, the City issued 11 permits, and 22 applications are currently (October 2021) under City review.

The following are other programs from the 5th Cycle that were effective in providing direct and/or indirect support for those with special needs:

- Program 6a – Continue to participate in Los Angeles County Housing Authority programs, and publicize availability of Section 8 rental assistance for households in the City, which supports very low-income families, older adults, and those with disabilities by providing financial support to assist with rent payments.
- Program 7a – Continue to participate in area-wide programs to ensure fair housing. Through this program, the City continued to contract with the Housing Rights Center to provide residents, including people who have special needs, support with fair housing–related issues. The Housing Rights Center assisted residents with discrimination inquiries and tenant/landlord services related to general housing issues, including eviction, tenant/landlord general information, lease terms,

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<sup>1</sup> The United States Department of Housing and Urban Development defines households with worst-case needs as very low-income renters who do not receive government housing assistance and who pay more than 50 percent of their income for rent, live in severely inadequate conditions, or both.

notices, repairs, security deposits, substandard conditions, and utilities. The program was effective, but will be revised to play a more active role in affirmatively furthering fair housing through the support and engagement in the Regional Analysis of Impediments to Fair Housing, development of outreach materials related to fair housing practices for developers, and the creation of a procedure that prompts fair housing administration for development decisions.

- Program 7b – Provide for the housing needs of seniors. Program 7b was effective in preserving 81 affordable units for very low-, low-, and moderate-income residents, and older adults with disabilities. In addition, the City recently approved an assisted living project for older adults consisting of 95 rooms (115 total beds), a facility kitchen, and common areas. The project will include 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss.
- Program 7c – Provide for the special needs of seniors so that they may remain in the community. Program 7c was extremely effective in serving thousands of older adults through a variety of support services, programs, and classes.
- Program 7d – Reasonable accommodation for persons with disabilities. This program was effective as the City continues to implement Reasonable Accommodation policies, and will be further evaluated in the 6th Cycle to remove any potential constraints that may still exist.
- Program 8a – Continue the active code enforcement program for illegal and substandard units. Program 8a addressed reports of possible code enforcement violations from residents, and, through referrals to the County of Los Angeles Environmental Health Division, addressed rental housing enforcement conditions/inspections for reports of possible substandard housing conditions. This program was effective in providing services to renters who may often be residents with special needs.

In addition, while not included as a 5th Cycle housing program, in 2017, the County of Los Angeles passed Measure H, which created significant new resources to address homelessness, including providing to local jurisdictions the opportunity to apply for City Homelessness Plan Implementation Grants. In October 2017, a total of 47 cities were awarded grants, including the City of Manhattan Beach. The City intended to use its \$330,666 grant to coordinate with other jurisdictions, including the County of Los Angeles, local stakeholders, and neighboring cities, to address homelessness in the community. The City recognized this would only be accomplished through an active constituency working together, including government, businesses, and the faith community, to tackle the causes of homelessness and implement solutions.

In August 2018, the City Council adopted the City’s Five-Year Plan to Address Homelessness in Our Community, and appointed a Homelessness Task Force. The plan, available on its website, contains goals aligned with the City’s and County of Los Angeles’ objectives to address homelessness. The plan also contains an outline of collaborative opportunities, and demonstrates a correlation between the City’s efforts and the County of Los Angeles’ Homeless Initiative Strategies. In November 2018, at the recommendation of the Homelessness Task Force, the City submitted a multi-jurisdictional proposal with the Cities of Redondo Beach and Hermosa Beach (all three collectively referred to as the “South Bay Beach Cities”) to the County of Los Angeles for outreach and education, coordination of regional efforts to address homelessness, and housing navigation services. In April 2019, the Los Angeles County Homeless Initiative announced the award of Measure H grant funding to the South Bay Beach Cities totaling \$330,665 toward homeless coordination, training, and housing navigation services.

In September 2019, the City, along with regional partners the Cities of Redondo Beach and Hermosa Beach, solicited proposals from qualified homeless service providers. Subsequently, the City Council awarded a subcontract to Harbor Interfaith Services to provide three full-time-equivalent positions to assist individuals and families experiencing homelessness in the South Bay Beach Cities. Harbor Interfaith Services was established in 1987 and provides a variety of services to individuals and families, including a 90-day emergency shelter, 18-month transitional housing program, and a Family Resources Center. The City continues to provide information regarding services available for those experiencing homelessness on its website via its Homeless Resource Guide.

New programs identified in the 6th Cycle Housing Element will continue striving to specifically address housing needs and the concerns of residents with special needs.

# Appendix B: Needs Assessment

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# 1 Introduction

The Needs Assessment examines general population and household characteristics and trends, such as age, race and ethnicity, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock (e.g., number of units and type, tenure, age and condition, cost) are also addressed. Finally, the projected housing growth needs for the City of Manhattan Beach (City) based on the 2021–2029 Regional Housing Needs Allocation are examined.

The Housing Needs Assessment uses the most recent available data from the U.S. Census, California Department of Finance, California Employment Development Department, Southern California Association of Governments, and other relevant sources. Supplemental data was obtained through field surveys.

## 2 Overview

Manhattan Beach is located within the southwestern coastal portion of Los Angeles County in what is commonly referred to locally as the “South Bay” (**Figure 1, Regional Map**). To the north is the City of El Segundo, to the east is Redondo Beach and the City of Hawthorne, to the south is Hermosa Beach, and to the west is the Pacific Ocean. The City has a total land area of 2,483 acres (3.88 square miles).

The City is made up of several distinct neighborhoods that are grouped into “planning areas” that reflect the City’s unique and varied environment (**Figure 2, Planning Areas**). These planning areas are as follows:

- **Beach Area.** This area contains most of the City’s multifamily rental housing. Lots in this area are small, with generally less than 3,000 square feet, and parking for residents and visitors is in short supply. The City’s General Plan calls for the maintenance and enhancement of the “Village” atmosphere within the downtown commercial district. The City’s goal is to promote the preservation of the small specialty retail and service activities that serve both visitors to the beach and local residents while also encouraging mixed-used residential/commercial development.
- **Hill Section.** This area consists primarily of single-family residential development, with commercial and higher-density residential development limited to Sepulveda Boulevard and Manhattan Beach Boulevard. Higher-density, multifamily residential development is directed to those parcels located on either side of Manhattan Beach Boulevard, which is already developed with a mix of commercial and multifamily residential uses.
- **East-Side/Manhattan Village.** This includes all of the City’s land area located east of Sepulveda Boulevard, and a large proportion of the City’s commercial and residential uses are within this area. Medium- and high-density residential development is located along Manhattan Beach Boulevard, Artesia Boulevard, and in areas adjacent to Manhattan Intermediate and Meadows schools, which are designated exclusively for multifamily residential development. Manhattan Village includes a substantial amount of regional commercial and office development, as well as a significant number of condominium units.
- **Tree Section.** This portion of the City is located east of Grandview Avenue and northwest of Valley Drive. A small portion of the area adjacent to Sepulveda Boulevard is designated for commercial uses.

- **El Porto.** This area was formerly the unincorporated community of El Porto and is located north of 38th Street between the ocean and the City of El Segundo. The area is developed with a mix of residential and commercial uses. El Porto has the highest residential development intensities found in the City. The General Plan protects the mix of multifamily and commercial development presently existing in this area.



Figure 1. Regional Map



Figure 1. Planning Areas

### 3 Data Sources

Various sources of information were consulted in preparing this Housing Needs Assessment for the General Plan Housing Element. The 2010 Census provides the basis for population and household characteristics. The following sources of information were used to supplement and update information contained in the 2000 and 2010 Census data:

- California Department of Finance’s 2010–2021 E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021
- Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy, 2013–2017
- California Department of Housing and Community Development (HCD) State Income Limits for 2021
- U.S. Census Bureau (Census) American Community Survey (ACS), 5-Year Estimates, 2019
- California Employment Development Department’s Long-Term Occupational Employment Projections, 2021
- U.S. Bureau of Labor Statistics – Standard Occupation Classification, 2020
- Los Angeles Homeless Services Authority (LAHSA) 2016–2020 Homeless Count Data by Community/City
- California Department of Developmental Services’ Quarterly Consumer Report, 2020
- California Department of Industrial Relations Minimum Wage, 2020
- HUD Fiscal Year 2000–2020 Fair Market Rents, 2020
- HUD Fiscal Year 2020 Income Limits Summary, 2020
- Southern California Association of Governments’ Pre-Certified Local Housing Data for the City of Manhattan Beach, 2020
- Southern California Association of Governments’ Adopted Growth Forecast, 2020

## 4 Population Characteristics

Housing needs are primarily influenced by population and employment trends. This section provides a summary of the changes to the population size, and age and racial/ethnic composition of the City.

### 4.1 Population Growth Trends

Manhattan Beach is one of 88 cities in Los Angeles County, the most populous county in the Southern California Association of Governments’ region. From 2000 to 2021, the population of Los Angeles County (County) increased by approximately 7 percent. **Table 1, Regional Population Trends (2000, 2010, 2020)**, provides a summary of population trends for counties in Southern California and their respective populations over the last two decades.

Table 1. Regional Population Trends (2000, 2010, 2020)			
County	2000	2010	2020
Imperial County	142,361	174,528	188,777
Los Angeles County	9,519,338	9,818,605	10,172,951
Orange County	2,846,289	3,010,232	3,194,332
Riverside County	1,545,387	2,189,641	2,442,304
San Bernardino County	1,709,434	2,035,210	2,180,537
San Diego County	2,813,833	3,095,313	3,343,355
Ventura County	753,197	823,318	842,886

Source: U.S. Census 1990 STF 1, 2000 SF 1, 2010 SF 1; CA DOF 2020

Manhattan Beach had a population of 35,058 in 2021. Manhattan Beach grew very slowly during the 2000s, having grown less than 4 percent from 2000 to 2010. Most of the growth that has recently occurred has consisted of density increases on existing parcels through demolition and replacement of existing homes. From 2010 to 2021, the City’s population remained stable, but with a slight decrease by about 0.22 percent. This is in contrast with the County, which grew by 3.14 percent between 2000 and 2010, and an additional 2.3 percent from 2010 to 2021 (see **Table 2, Population Trends (2000–2021)**). As an essentially built-out city, there continues to be few opportunities for growth, except through redevelopment/infill on existing parcels.

Table 2. Population Trends (2000–2021)					
	2000	2010	2020	Growth 2000–2010	Growth 2010–2021
Manhattan Beach	33,852	35,135	35,058	3.8%	(0.22%)
Los Angeles County	9,519,338	9,818,605	10,172,951	3.14%	2.3%

Source: CA DOF Table E-5, 2021



## 4.2 Age

One of the more significant indicators of future potential population growth trends is a population’s age characteristics. **Table 3, Population Age Groups (2019)**, summarize the age characteristics for key age groups of the City’s population in 2019, based off ACS Census data. Manhattan Beach has a relatively older population compared the rest of the County. The largest portion of residents in Manhattan Beach are adults 45 to 54 years of age (17 percent), but the number of older adults (65 years and older) is only slightly lower, at 16 percent of the population. The higher percentage of older adults is an important consideration for housing needs, as discussed in more detail in Section 6, Special Needs Populations.

Housing needs are influenced by the age characteristics of the population. Different age groups have different housing needs based on lifestyles, family types, income levels, and housing preference. Table 3 shows that the age distribution of the City’s population is older than the County as a whole, with Manhattan Beach’s population having a median age (44 years old) about 8 years older than the County. An older population has implications regarding the type and size of future housing needs, as well as accessibility.

<b>Table 3. Population Age Groups (2019)</b>				
Age Group	Manhattan Beach		Los Angeles County	
	Persons	Percent	Persons	Percent
Under 5 years	2,107	5.9%	611,485	6.1%
5 to 9 years	2,605	7.3%	596,485	5.9%
10 to 14 years	2,906	8.2%	627,199	6.2%
15 to 19 years	2,353	6.6%	641,814	6.4%
20 to 24 years	827	2.3%	717,692	7.1%
25 to 34 years	2,761	7.8%	1,623,246	16.1%
35 to 44 years	4,904	13.8%	1,379,814	13.7%
45 to 54 years	6,124	17.3%	1,355,625	13.4%
55 to 59 years	2,591	7.3%	629,508	6.2%
60 to 64 years	2,312	6.5%	562,724	5.6%
65 to 74 years	3,260	9.2%	758,833	7.5%
75 to 84 years	2,053	5.8%	393,364	3.9%
85 years and over	697	2.0%	183,781	1.8%
<b>Total</b>	35,500	100%	10,081,570	100%
<b>Median age</b>	44	—	36.5	—

Source: ACS DP05 5YR Estimates, 2019

## 4.3 Race and Ethnicity

According to ACS Census estimates, the majority of Manhattan Beach residents identified as White, Not Hispanic or Latino, at 73 percent. Residents who identify as Asian alone account for 13 percent of the population, and Hispanic or Latino (any race) account for 8 percent of the population. The racial and ethnic composition of the City differs from the County in that a lower proportion of City residents are Hispanic/Latino or other racial minorities; see **Table 4, Race/Ethnicity (2019)**.

<b>Table 4. Race/Ethnicity (2019)</b>				
Racial/Ethnic Group	Manhattan Beach		Los Angeles County	
	Persons	Percent	Persons	Percent
<b>Not Hispanic or Latino</b>	<b>32,662</b>	<b>92.00%</b>	<b>5,193,136</b>	<b>51.50%</b>
White alone	26,018	73.30%	2,641,770	26.20%
Black or African American alone	155	0.40%	790,252	7.80%
American Indian and Alaska Native alone	64	0.20%	20,831	0.20%
Asian alone	4,763	13.40%	1,454,769	14.40%
Native Hawaiian and Other Pacific Islander alone	34	0.10%	24,597	0.20%
Some other race alone	47	0.10%	32,413	0.30%
Two or more races	1,581	4.50%	228,504	2.30%
Hispanic or Latino (any race)	2,838	8.00%	4,888,434	48.5%
<b>Total</b>	<b>35,500</b>	<b>100%</b>	<b>10,081,570</b>	<b>100%</b>
Source: ACS DP05 5YR Estimates, 2019				

#### 4.4 Employment

Housing needs are also influenced by employment characteristics. Significant employment opportunities within a city can increase demand for housing in proximity to jobs. **Table 5, Employment by Occupation (2019)**, shows that Manhattan Beach has 17,006 workers living within its borders who work across five major industrial sectors. In 2019, the largest industry to employ residents of Manhattan Beach was the Management, Business, Science, and Arts occupations industries, accounting for 69.8 percent of the labor force (see **Table 6, Labor Force (2019)**).

Employment is an important factor affecting housing needs within a community. The jobs available in each employment sector and the wages for these jobs affect the type and size of housing residents can afford. Employment and projected job growth have a significant influence on housing needs during this planning period.

<b>Table 5. Employment by Occupation (2019)</b>		
Occupation	Manhattan Beach	
	Persons	Percent
Civilian-employed population 16 years and over	16,138	100%
Management, business, science, and arts occupations	11,266	69.80%
Service occupations	747	4.60%
Sales and office occupations	3,380	20.90%
Natural resources, construction, and maintenance occupations	285	1.80%

Table 5. Employment by Occupation (2019)		
Occupation	Manhattan Beach	
	Persons	Percent
Production, transportation, and material moving occupations	460	2.90%
Source: ACS DP03 5YR Estimates, 2019		

Table 6. Labor Force (2019)				
Labor Force Status	Manhattan Beach		Los Angeles County	
	Persons	Percent	Persons	Percent
Population 16 years and over	27,331	100.0%	8,123,894	100.0%
In labor force	17,006	62.2%	5,253,694	64.7%
Civilian labor force	16,999	62.2%	5,249,298	64.7%
Employed	16,138	59.0%	4,929,863	60.7%
Unemployed	861	3.2%	319,435	3.9%
Armed Forces	7	0.0%	4,396	0.1%
Not in labor force	10,325	37.8%	2,870,200	35.3%
Source: ACS DP03 5YR Estimates, 2019				

## 4.5 Projected Job Growth

**Table 7, Projected Employment Growth (2018–2028)**, shows projected employment growth by industry for Los Angeles County for the period 2018–2028. The greatest number of new jobs projected to be produced in the County over this 10-year period is expected to be in Personal Care and Service, Healthcare Practitioners and Support, Community and Social Service, Life/Physical/Social Sciences, Community and Social Services, and Food Preparation and Serving Related. According to recent Census data, about 93 percent of employed Manhattan Beach residents worked in the County, and 23 percent of all workers were employed within the City limits (see **Table 8, City Resident’s Workplace Location (2019)**).

Table 7. Projected Employment Growth (2018–2028)					
SOC Code*	Standard Occupation Classification Occupation Profiles – Major Groups	Annual Average Employment		Employment Change	
		2018	2028	Numerical	Percent
00-0000	All Occupations	4,842,300	5,269,800	427,500	8.8%
11-0000	Management	903,800	994,880	91,080	10.1%
13-0000	Business and Financial Operations	865,100	937,690	72,590	8.4%
15-0000	Computer and Mathematical	363,790	408,300	44,510	12.2%
17-0000	Architecture and Engineering	217,960	228,810	10,850	5.0%

<b>Table 7. Projected Employment Growth (2018–2028)</b>					
SOC Code*	Standard Occupation Classification Occupation Profiles – Major Groups	Annual Average Employment		Employment Change	
		2018	2028	Numerical	Percent
19-0000	Life, Physical, and Social Science (scientists)	112,640	128,900	16,260	14.4%
21-0000	Community and Social Service (e.g., counselors, therapists, social workers, clergy)	275,070	319,800	44,730	16.3%
23-0000	Legal	166,140	182,530	16,390	9.9%
25-0000	Educational Instruction and Library	825,950	905,060	690	0.08%
27-0000	Arts, Design, Entertainment, Sports, and Media	644,050	692,130	48,080	7.5%
29-0000	Healthcare Practitioners and Technical	681,610	783,130	101,520	14.9%
31-0000	Healthcare Support	314,750	369,620	54,870	17.4%
33-0000	Protective Service (e.g., first responders, security guards, animal control)	339,620	372,060	31,440	9.3%
35-0000	Food Preparation and Serving Related	1,266,930	1,457,820	190,890	15.1%
37-0000	Building and Grounds Cleaning and Maintenance	401,140	431,450	30,310	7.6%
39-0000	Personal Care and Service (e.g., entertainment, amusement, animal care, beauty/nail salons, barbers)	1,033,020	1,364,300	331,280	32.1%
41-0000	Sales and Related	1,353,930	1,391,030	37,100	2.7%
43-0000	Office and Administrative Support	2,119,180	2,101,620	-17,560	-0.83%
45-0000	Farming, Fishing, and Forestry	16,720	15,130	-1,590	-9.5%
47-0000	Construction and Extraction	423,990	472,980	48,990	11.5%
49-0000	Installation, Maintenance, and Repair (e.g., electronics, telecommunications, vehicles, solar/wind)	393,540	407,560	14,020	3.6%
51-0000	Production (e.g., manufacturing, food processing, assembly, machinists)	712,800	646,310	-66,490	-9.3%
53-0000	Transportation and Material Moving	1,026,800	1,120,840	94,040	9.2%

Source: California Employment Development Department, Long-Term Occupational Employment Projections, 2021

\* Standard Occupation Classification – U.S. Bureau of Labor Statistics, 2020

<b>Table 8. City Resident's Workplace Location (2019)</b>	
Workplace Location	Percent
Worked in state of residence	98.80%
Worked in county of residence	93.90%
Worked in place of residence	22.70%
Worked outside county of residence	4.90%
Worked outside state of residence	1.20%
Source: ACS S0801 5YR Estimates, 2019	

## 5 Household Characteristics

Housing needs in Manhattan Beach are primarily influenced by population and employment trends. This section provides a summary of the changes to the population size and age, and racial/ethnic composition of the City.

### 5.1 Household Composition and Size

Household characteristics are important indicators of the type and size of housing needed in a city. The Census defines a “household” as all persons occupying a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing a single unit. Persons in group quarters, such as dormitories, retirement or convalescent homes, or other group living situations, are included in population totals, but are not considered households.

Manhattan Beach had 13,427 households, as estimated by the ACS in 2019. **Table 9, Household Composition (2019)**, provides a comparison of households by type for the City and the County as a whole. Family households in 2019 comprised approximately 71 percent of all households in the City, 5 percent more than the County. The City’s average household size is lower than the County as a whole (2.64 persons per household vs. 2.96 persons per household for Los Angeles County). These statistics suggest that there is less need for large units in Manhattan Beach than in other areas of the County.

<b>Table 9. Household Composition (2019)</b>				
Household Type	Manhattan Beach		Los Angeles County	
	Households	Percent of Total Households	Households	Percent of Total Households
<b>Family Households</b>	9,581	71.3%	2,204,715	66.2%
–Husband-wife family	7,931	59.1%	1,488,600	44.7%
–With own children under 18 years	3,858	28.7%	610,365	18.3%
–Male householder, no wife present	759	5.6%	234,179	7.0%
–With own children under 18 years	348	2.6%	85,613	2.6%
–Female householder, no husband present	891	6.6%	481,936	14.5%
–With own children under 18 years	430	3.2%	196,097	5.9%
<b>Non-Family Households:</b>	3,846	28.6%	1,123,683	33.8%
–Householder living alone	3,034*	78.9%*	449,473*	40%*
<b>Households with Individuals Under 18 Years</b>	4,766	35.5%	1,051,774	31.6%
<b>Households with Individuals 65 Years and Over</b>	5,411	40.3%	1,328,031	39.9%
<b>Total Households</b>	13,427	100.0%	3,328,398	100.0%
<b>Average Household Size</b>	2.64	—	2.96	—

Table 9. Household Composition (2019)				
Household Type	Manhattan Beach		Los Angeles County	
	Households	Percent of Total Households	Households	Percent of Total Households
Source: ACS S1101 5YR Estimates, 2019				
* Of total non-family households.				

## 5.2 Housing Tenure

Housing tenure (owner vs. renter) is an important indicator of the housing market. Communities strive to have an adequate supply of units available both for rent and for sale to accommodate a range of households with varying incomes, family sizes and composition, and lifestyles. **Table 10, Household Tenure (2019)**, provides a comparison of the number of owner-occupied and renter-occupied units in the City in 2019 as compared to the County as a whole. Table 10 reveals a higher level of home ownership in the City, which is approximately 24 percentage points higher than the County.

Vacancy rates are an indicator of housing supply and demand. Low vacancy rates indicate greater upward price pressures and a higher rate indicates downward price pressure. In general, an optimal vacancy rate is 2 percent for owner-occupied housing and 4 percent to 6 percent for rental units in a mature community, which indicates a stable housing market. This level of vacancy is assumed to ensure sufficient residential mobility and housing choice while providing adequate financial incentive for rental owners and owners living in their home to maintain and repair their homes. In 2010, the vacancy rate in the City was about 1.7 percent, which is considered unstable.

Table 10. Household Tenure (2019)				
Housing Type	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
<b>Occupied Housing Units</b>	13,427	89.40%	3,316,795	93.60%
Owner-occupied housing units	9,344	69.60%	1,519,516	45.80%
Average household size of owner-occupied units	2.81	—	3.17	—
Renter-occupied housing units	4,083	30.40%	1,797,279	54.20%
Average household size of renter-occupied units	2.26	—	2.83	—
<b>Vacant Housing Units</b>	1,593	10.60%	226,005	6.40%
For rent	172	1.1%	63,242	1.8%
Rented, not occupied	86	0.57%	17,027	0.5%
For sale only	165	1.1%	16,209	0.46%
Sold, not occupied	274	1.8%	10,203	0.3%
For seasonal, recreational, or occasional use	640	4.3%	32,192	0.91%
All other vacant units	256	1.7%	87,132	2.5%

<b>Table 10. Household Tenure (2019)</b>				
Housing Type	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
Homeowner vacancy rate	—	1.7%	—	1.0%
Rental vacancy rate	—	4%	—	3.4%
<b>Total Housing Units</b>	15,020	100%	3,542,800	100%

Sources: ACS DP04 5YR Estimates, 2019/ACS B25004 5YR Estimates, 2019

### 5.3 Overcrowding

Overcrowded housing units may be an indicator of potential housing problems. When a housing unit is occupied by a large number of persons, housing unit deterioration may be accelerated. According to the U.S. Census definition, a unit with more than one person per room is considered to be overcrowded, and housing units containing 1.5 persons or more per room are considered to be severely overcrowded. In this definition, “rooms” include living rooms, dining rooms, and bedrooms, but does not include the kitchen or bathrooms. Although some families with low incomes may willingly opt for overcrowded living arrangements to reduce spending, many lower-income residents often have no choice but to live in overcrowded housing. These overcrowded housing units place a strain on physical facilities and does not provide a satisfying living environment. Based on U.S. Census standards, Manhattan Beach residents live in relatively less-crowded housing conditions than the rest of Los Angeles County (see **Table 11, Overcrowding (2019)**). Recent Census data indicate that there were only 0.4 percent overcrowded owner-occupied units and 2.15 percent overcrowded renter-occupied units in Manhattan Beach. In the County, however, 2.53 percent of the owner-occupied units and approximately 16.21 percent of renter-occupied units are considered overcrowded.

<b>Table 11. Overcrowding (2019)</b>				
Occupants per Room	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
<b>Owner-occupied units</b>	<b>13,427</b>	<b>100%</b>	<b>3,316,795</b>	<b>100%</b>
1.01 to 1.50	59	0.44%	61,697	1.86%
1.51 to 2.00	0	0.00%	15,703	0.47%
2.01 or more	0	0.00%	6,891	0.20%
<b>Renter-occupied units</b>	<b>4,083</b>	<b>100%</b>	<b>1,797,279</b>	<b>100%</b>
1.01 to 1.50	51	1.24%	157,166	8.74%
1.51 to 2.00	37	0.91%	94,624	5.26%
2.01 or more	0	0.00%	39,831	2.21%

Source: ACS B25014 5YR Estimates, 2019

### 5.4 Household Income and Extremely Low-Income Households

HCD has identified the following income categories based on the area median income (AMI) of Los Angeles County. The AMI for the County in 2020 was \$77,300 for a hypothetical family of four.

- Extremely low-income: Households earning up to 30 percent of the AMI



- Very low-income: Households earning 31 to 50 percent of the AMI
- Low-income: Households earning 51 percent to 80 percent of the AMI
- Moderate-income: Households earning 81 percent to 120 percent of the AMI
- Above moderate-income: Households earning over 120 percent of the AMI

Household income is a primary factor affecting housing needs in a community. The ability of residents to afford housing is directly related to household income. According to recent Census data, the 2019 median household income in Manhattan Beach was \$153,023, more than double that of the County at \$68,044. See **Table 12, Median Household Income (2019)**.

Table 12. Median Household Income (2019)		
Jurisdiction	Median Income	Percent of Los Angeles County Median Income
Manhattan Beach	\$153,023	239%
Los Angeles County	\$68,044	100%

Source: ACS DP03 5YR Estimates, 2019

Per HCD requirements, local governments must identify those households that are considered to be extremely low income. Extremely low-income households are those with incomes that do not exceed 30 percent of the County’s median family income, according to HUD’s income limits. Households included in this category typically represent the lowest wage earners in a community, with wages corresponding to the current annual minimum wage of \$14.00 per hour for employers with 26 employees or more, and \$13.00 per hour for employers with 25 employees or fewer (as of January 1, 2021). The annual minimum wage is set to increase by \$1.00 per hour each year until reaching the annual minimum wage of \$15.00 per hour (all employers are set to reach this wage as of January 1, 2023). The annual wage figure cited previously assumes full-time employment. **Table 13, Annual Income Limits for Los Angeles–Long Beach–Glendale Metro Fair Market Rent Area (2020)**, indicates the household income limits for the various lower-income categories (extremely low, very low, and low) in 2020, as calculated and provided by HUD’s 2020 State Income Limits in relation to the County’s median family income of \$77,300. These figures are arranged according to the number of persons who comprise a household. For example, as shown in Table 13, a household with one person is considered to be low income if the annual household income is \$63,100, and a household containing five persons is considered to be low income if its annual household income is \$97,350. The information included in Table 13 may be used to determine what percentage of a household’s income will be expended monthly for housing without being considered cost burden. For example, a household consisting of three persons with an annual income of \$50,700 ideally should not spend more than \$1,267.50 per month on housing costs. This figure represents 30 percent of that household’s annual income. According to HUD’s 2013–2017 Comprehensive Housing Affordability Strategy data, approximately 6 percent of households in the City are extremely low-income. Based on the City’s 6th Cycle Regional Housing Needs Allocation, there is a need for approximately 161 extremely low-income units during the planning period. [Resources available to extremely low-income residents in the City, including the County Home Ownership Program for lower-income first-time buyers, Countywide affordable rental housing development programs, Section 8 Housing Choice Voucher Programs, and existing affordable housing stock available to extremely low-income households, are identified and fully described in Section 7, Special Needs Population, and](#)

throughout the Housing Element programs. To achieve the RHNA targets and meet the needs of extremely low-income residents, the City will implement numerous programs in the Housing Element that are aimed to address the needs of extremely low-income households.

See Programs 1, 3, 8, 9, 10, 12, 15, 16, 18, 21, 24 and 28 in the Housing Element for full program details.

Household Size	Extremely Low-Income Limit (30%)	Very Low-Income Limit (50%)	Low-Income Limit (80%)
1 person	\$23,700	\$39,450	\$63,100
2 persons	\$27,050	\$45,050	\$72,100
3 persons	\$30,450	\$50,700	\$81,100
4 persons	\$33,800	\$56,300	\$90,100
5 persons	\$36,550	\$60,850	\$97,350
6 persons	\$39,250	\$65,350	\$104,550
7 persons	\$41,950	\$69,850	\$111,750
8 persons	\$44,650	\$74,350	\$118,950

Source: U.S. Department of Housing and Urban Development, State Income Limits 2020.

## 5.5 Overpayment

As defined by HUD, households spending more than 30 percent of their income, including rent or mortgage payments and utilities, are generally considered to be overpaying, or “cost burdened.” Severe overpaying occurs when households pay 50 percent or more of their gross income for housing. Therefore, according to HUD, housing is considered affordable if the cost is no more than 30 percent of a household’s income. No more than 30 percent is considered a reasonable threshold for households to be able to afford other expenses, such as transportation, healthcare, and groceries.

According to HUD, approximately 84 percent of lower-income renter households and 55 percent of lower-income owner households were overpaying for housing; see **Table 14, Overpayment by Tenure (2017)**. The highest rates of overpayment were among very low- and extremely low-income households. Although homeowners enjoy interest and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burden can require families to double up, resulting in overcrowding and related problems.

Comprehensive Housing Affordability Strategy Income Category	Owners		Renters	
	Households	Percent	Households	Percent
Extremely low-income households	460	—	300	—
Households overpaying	300	65.2%	235	78%
Very low-income households	500	—	120	—
Households overpaying	240	48%	104	87%

Table 14. Overpayment by Tenure (2017)				
Comprehensive Housing Affordability Strategy Income Category	Owners		Renters	
	Households	Percent	Households	Percent
Low-income households	850	—	525	—
Households overpaying	455	53.5%	450	86%
<b>Subtotal: All Lower-Income Households</b>	<b>1,810</b>	<b>—</b>	<b>945</b>	<b>—</b>
<b>Subtotal: Households Overpaying</b>	<b>995</b>	<b>55%</b>	<b>789</b>	<b>83.5%</b>
Moderate-income households	520	—	285	—
Households overpaying	265	51%	200	70.2%
Above moderate-income households	6,990	—	2,985	—
Households overpaying	1,240	17.7%	445	15%

Source: U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy, based on the 2013–2017 ACS

**Table 15, Percent Income Spent on Rent (2021)**, shows the 2020 distribution of renter households by the percent of income they spend on rent. About 37 percent (1,420) of renter households in the City spend more than 30 percent of gross income on housing costs, and 17 percent (644) spend more than half of their income on housing costs.

Table 15. Percent Income Spent on Rent (2021)		
Percent of Income Spent	Number of Renter Households	Percent of Total Renter Households
<20%	1,284	33%
20–29%	1,162	30%
30–49%	776	20%
>50%	644	17%
<b>Total</b>	<b>3,866</b>	<b>100%</b>

Source: Southern California Association of Governments Pre-Certified Local Housing Data for City of Manhattan Beach, 2021

The HUD-formulated Fair Market Rent schedule serves as a guide for the maximum rents allowable for those units receiving Section 8 assistance. HUD uses the Consumer Price Index and the Census Bureau housing survey data to calculate the Fair Market Rent for each area. **Table 16, Fair Market Rent Summary Los Angeles–Long Beach HUD Metro Fair Market Rent Area (2021)**, indicates the Fair Market Rents for one-, two-, three-, and four-bedroom units in the Los Angeles–Long Beach–Glendale Fair Market Rent Area in 2021. Very low- and extremely low-income households have a very difficult time finding housing without overpaying.

Table 16. Fair Market Rent Summary Los Angeles–Long Beach HUD Metro Fair Market Rent Area (2021)				
Efficiency	One Bedroom	Two Bedrooms	Three Bedrooms	Four Bedrooms
\$1,369	\$1,605	\$2,058	\$2,735	\$2,982

Source: U.S. Department of Housing and Urban Development (HUD), 2021

## 6 Housing Stock Characteristics

This section presents an evaluation of the characteristics of the community’s housing stock, and helps in identifying and prioritizing needs. The factors evaluated include the number and type of housing units, recent growth trends, age and condition, tenure, vacancy, housing costs, affordability, and assisted affordable units at risk of loss due to conversion to market rates. A housing unit is defined by the Census Bureau as a house, apartment, mobile home, or group of rooms occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters.

### 6.1 Housing Type and Growth Trends

According to the California Department of Finance’s Population and Housing estimates, there were 15,043 housing units in Manhattan Beach in 2021, an increase of approximately 5 percent from 2012. Of the total housing stock in 2020, the majority, or 77 percent, was single-family detached units, and 23 percent was multifamily units. Mobile homes comprised the remaining 0.1 percent. **Table 17, Housing by Type (2012 and 2021)**, provides a breakdown of the housing stock by type, along with growth trends for the City compared to the County as a whole for 2012–2021. From 2012 to 2021, the City had an increase of 111 single-family units and a decrease of 24 multifamily units due to the replacement of existing duplexes with single-family residential structures that include at least one accessory dwelling unit.

Table 17. Housing by Type (2012 and 2021)						
Structure Type	2012		2021		Growth	
	Units	Percent	Units	Percent	Units	Percent
Manhattan Beach						
Single-family	11,510	77%	11,621	77%	111	0.96%
Multifamily	3,432	22.9%	3,408	22.7%	-24	-0.7%
Mobile homes	14	0.09%	14	0.09%	0	0%
Total units	14,956	100%	15,043	100%	87	5.8%
Los Angeles County						
Single-family	1,947,879	57.2%	1,971,020	54.5%	23,141	1.2%
Multifamily	1,447,968	41.9%	1,585,448	43.8%	137,480	9.5%
Mobile homes	58,284	1.7%	58,341	1.6%	57	9.8%
Total units	3,454,131	100%	3,614,809	100%	160,678	4.7%
Source: California Department of Finance Table E-5, 2021						

### 6.2 Housing Age and Condition

The age of a housing unit is often an indicator of housing condition. In general, housing that is 30 years or older may exhibit need for repairs based on the useful life of materials. For example, housing that is 30 years old or older is typically in need of some major rehabilitation, such as a new roof, foundation, or plumbing. Many Federal and State programs also use the age of housing as one factor in determining housing rehabilitation needs. Housing older than 50 years is considered aged and is more likely to exhibit a need for major repairs. **Table 18, Age of Housing Stock (2019)**, shows the age distribution of

the housing stock in Manhattan Beach compared to the County as a whole, as reported in recent Census data. The majority (28 percent) of housing stock in Manhattan Beach was built in 1950 through 1959.

Year Built	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
Built 2005 or later	432	3%	54,241	2%
Built 2000 to 2004	984	7%	109,255	3%
Built 1990 to 1999	1,567	10%	208,791	6%
Built 1980 to 1989	1,552	10%	403,248	12%
Built 1970 to 1979	1,637	11%	496,376	14%
Built 1960 to 1969	1,871	12%	518,500	15%
Built 1950 to 1959	4187	28%	722,473	21%
Built 1940 to 1949	1681	11%	396,035	12%
Built 1939 or earlier	1217	8%	516,817	15%
<b>Total units</b>	<b>15,128</b>	<b>100%</b>	<b>3,425,736</b>	<b>100%</b>

Source: ACS DP04 5YR Estimates, 2019

[Further, factors that may be indicators of substandard housing include a lack of telephone service, lack of plumbing facilities, and a lack of complete kitchen facilities. In Manhattan Beach, 158 units lack telephone service, 48 units lack plumbing facilities, and 26 units lack complete kitchen facilities. While there may be overlap between these features, a high estimate of the number of units in need of rehabilitation and replacement is estimated at 232 units. However, a true representation of the number of units in need of rehabilitation or replacement is likely much lower and a more accurate estimate is detailed in local housing condition data. Local data compiled through the City’s Building Official records indicates that the number of units in need of rehabilitation or replacement is 10 units. Only one of those 10 units on record is considered to be in such disrepair that it is uninhabitable and is currently vacant, and three of those 10 units are single-family homes in need of structural repairs.](#)

### 6.3 Housing Costs and Rents

High housing costs compared to household income can create housing challenges for households whose incomes fall below the AMI. When the housing stock does not meet the varying income needs of households at all income levels, housing affordability can become a burden on many households, especially those with limited earnings. This section evaluates housing cost trends in Manhattan Beach.

State law establishes five income categories for purposes of housing programs based on the AMI:

- Extremely Low (30 percent or less of AMI)
- Very Low (31 percent–50 percent of AMI)
- Low (51 percent–80 percent of AMI)
- Moderate (81 percent–120 percent of AMI)
- Above Moderate (over 120 percent of AMI)

Housing affordability is based on the relationship between household income and housing expenses. According to HUD and HCD, housing is considered “affordable” if the monthly payment is no more than 30 percent of a household’s gross income. In some areas, such as in Los Angeles County, these income limits may be increased to adjust for high housing costs.

**Table 19, Affordable Rental Housing Costs (2021)**, shows 2021 affordable rent levels for housing in Los Angeles County by income category. Based on State-adopted standards, the maximum affordable monthly rent for extremely low-income households is \$866, and the maximum affordable monthly rent for very low-income households is \$1,477. The maximum affordable monthly rent for low-income households is \$2,365, and the maximum affordable monthly rent for moderate-income households is \$2,400.

<b>Table 19. Affordable Rental Housing Costs (2021)</b>		
Income Category*	HCD-Adjusted Income Limit	Monthly Affordable Rent
Extremely Low: <30% AMI	\$35,450	\$866
Very Low: 31%–50% AMI	\$59,100	\$1,477
Low: 51%–80% AMI	\$94,600	\$2,365
Moderate: 81%–120% AMI	\$96,000	\$2,400
Above moderate: >120%	\$96,000+	\$2,400+

Source: California Department of Housing and Community Development (HCD) 2021 State Income Limits – April 2021  
 \* 2021 Los Angeles County Area Median Income (AMI) = \$80,000

The median monthly rent estimates by the number of bedrooms in a housing unit is listed in **Table 20, Median Monthly Rent by Unit Size in Manhattan Beach**. According to the 2019 estimates, the most affordable rental would be a studio, or zero-bedroom unit. The median monthly rent for this type of unit is \$1,745 per month, or \$20,940 annually. The minimum annual income needed to afford a studio apartment without being burdened by the costs is \$69,800 annually. For comparison, a three-bedroom apartment would require a minimum household income of \$128,080 to not be burdened by housing costs. A larger family, such as ones with children, would have additional costs such as childcare and education. Thus, leaving appropriately sized units further out of reach for lower-income households.

<b>Table 20. Median Monthly Rent by Unit Size in Manhattan Beach (2019)</b>	
<u>Unit Size</u>	<u>Median Gross Rent</u>
<u>Studio</u>	<u>\$1,745</u>
<u>1 Bedroom</u>	<u>\$2,027</u>
<u>2 Bedrooms</u>	<u>\$2,737</u>
<u>3 Bedrooms</u>	<u>\$3,202</u>
<u>4 Bedrooms</u>	<u>\$3,300</u>
<u>5 or More Bedrooms</u>	<u>\$3,250</u>

Source: 2019 ACS 5-Year Estimates B25031

## 6.4 Housing Price Trends

**Table 219, Value of Owner-Occupied Housing Units (2019)**, presents 2019 estimates of owner-occupied housing values in Manhattan Beach. In 2019, 88 percent were valued at \$1,000,000 or more. The median owner-occupied housing unit value is over \$2,000,000.

<b>Table 219. Value of Owner-Occupied Housing Units (2019)</b>	
<b>Value (dollars)</b>	<b>Number of Units</b>
Under \$50,000	201
\$50,000 to \$99,999	0
\$100,000 to \$149,999	59
\$150,000 to \$199,999	27
\$200,000 to \$299,999	50
\$300,000 to \$499,999	62
\$500,000 to \$999,999	702
\$1,000,000 or more	8,243
<b>Total</b>	<b>9,344</b>
Median Value: \$2,000,000+	
Source: 2019 ACS 5-Year Estimates DP04	

## 7 Special Needs Populations

Local Housing Elements must include an analysis of special housing needs because certain segments of the population have more difficulty in finding decent affordable housing due to special needs. This section identifies the special needs populations in the City, including persons with disabilities, older adults, large families and households, female-headed and single-parent households, farmworkers, and persons experiencing homelessness.

### 7.1 Persons with Physical and Developmental Disabilities

Physical and developmental disabilities can hinder access to traditionally designed housing units and potentially limit the ability to earn adequate income. Therefore, persons with disabilities often have special housing needs. Special exterior and interior design features are often needed to accommodate a tenant or homeowner with a disability. For example, door frames must be wider to accommodate wheelchairs, ramps are needed instead of stairs, handrails in bathrooms need to be installed, cabinet doors must be accessible, and light switches and other devices need to be within easy reach. The cost for retrofitting an existing structure may be thousands of dollars and be well beyond the reach of those households with lower incomes. The lack of housing to accommodate a person's physical or developmental disabilities is even more pronounced when it comes to market-rate rental units. Unless such provisions are made for persons with a disability during original construction, such facilities will not likely be provided in a typical rental unit.

#### Persons with Disabilities

Disability types include individuals with hearing, vision, cognitive, ambulatory, self-care, or independent living difficulties. The U.S. Census and the ACS provide clarifying questions to determine persons with disabilities and to differentiate disabilities within the population. The ACS defines a disability as a report of one of the six disabilities identified by the following questions:

- Hearing Disability: Is this person deaf or does he/she have serious difficulty hearing?
- Visual Disability: Is this person blind or do they have serious difficulty seeing even when wearing glasses?
- Cognitive Difficulty: Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions?
- Ambulatory Difficulty: Does this person have serious difficulty walking or climbing stairs?
- Self-Care Disability: Does this person have difficulty dressing or bathing?
- Independent Living Difficulty: Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone, such as visiting a doctor's office or shopping?

Households with members who have a physical or developmental disability are also often occupied by older adults. In the City, approximately 13 percent of people 65 years of age and older have at least one type of disability. In some cases, older adults may have more than one disability, which may make aging in place even more difficult (see **Table 224, Persons with Disabilities by Age in the City (2019)**).



**Table 224. Persons with Disabilities by Age in the City (2019)**

Disability by Age	Persons	Percent
Age 5 to 17 – Total Persons	9,486	—
Hearing disability	23	0.2%
Visual disability	35	0.4%
Cognitive disability	89	1.2%
Ambulatory disability	11	0.1%
Self-care disability	0	0.0%
Independent living disability	0	0.0%
Age 18 to 64 – Total Persons	19,997	—
Hearing disability	77	0.4%
Visual disability	120	4.1%
Cognitive disability	352	0.05%
Ambulatory disability	185	0.9%
Self-care disability	198	0.9%
Independent living disability	292	1.5%
Age 65 and Older – Total Persons	6,010	—
Hearing disability	598	10.0%
Visual disability	247	4.1%
Cognitive disability	244	4.1%
Ambulatory disability	594	9.9%
Self-care disability	265	4.4%
Independent living disability	771	12.8%
Source: ACS S1810 5-Year Estimates 2019 Disability Characteristics		
Note: Totals may exceed 100% due to multiple disabilities per person.		

**Persons with Developmental Disabilities**

According to the California Welfare and Institutions Code Section 4512, a development disability “means a disability that originates before an individual attains 18 years of age, is expected to continue indefinitely, and constitutes a substantial disability for that individual.” The term developmental disability “includes intellectual disability, cerebral palsy, epilepsy, autism, and other disabling conditions found closely related to intellectual disability.”

The California Welfare and Institutions Code also defines a “substantial disability” as “the existence of significant functional limitations in three or more of the following areas of major life activity, as determined by a regional center, and as appropriate to the age of the person”:

- Self-care
- Receptive and expressive language
- Learning
- Mobility

- Self-direction
- Capacity for independent living
- Economic self-sufficiency

In California, the State Department of Development Services provides community-based services to persons with developmental disabilities and their families through a Statewide system of 21 community-based, non-profit agencies known as regional centers. The Harbor Regional Center, located in the City of Torrance, serves the City of Manhattan Beach and is one of the 21 regional centers that provides a point of entry to services for people with developmental disabilities. These centers serve people of all ages with developmental disabilities and their families. In 2020, the Harbor Regional Center served over 15,000 clients. As of September 2021, there were approximately 283 persons in the City who have been diagnosed with a developmental disability and are receiving case management services at the Harbor Regional Center, consisting of 159 residents between 0 to 17 years old and 124 residents 18 years and older. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent; therefore, based on the number of people who are diagnosed and receiving treatment, the City is below this threshold by 242 persons.

Because disabilities include a wide range and severity of sensory, physical, mental, and developmental conditions, the special needs of persons with disabilities is wide ranging, as well. In addition to affordable and accessible housing, transportation, and proximity to services, many persons with disabilities need on-site support or even full-time care in a group home environment.

The following existing resources provide services for persons with disabilities in the City:

- Dial-A-Ride: essential transportation service for residents ages 55+ or disabled with destinations to most medical facilities and a variety of shopping destinations.
- General Relief (GR): A County-funded program that provides cash aid to indigent adults, and children in special circumstances who are ineligible for federal or State programs.
- In-Home Supportive Services (IHSS): an alternative to out-of-home care, IHSS will help pay for services provided to individuals over 65 years of age, disabled (adult or child), or blind.
- Restaurant Meals Program: allows homeless, disabled, and elderly receiving CalFresh benefits to use their Golden State Advantage (EBT) cards to purchase meals from participating restaurants.
- Volunteers of America Greater Los Angeles: non-profit aiding with behavioral health services, veterans' services, and affordable housing.

In addition, communities, resources, and services for older adults can be found in **Section 7.2, Households Headed by Older Adults**. Communities, resources, and services for persons with disabilities seeking emergency housing assistance can be found in **Section 7.6, People Experiencing Homelessness**.

The City's Housing Element addresses persons with disabilities through various programs including **Program 4, Affordable Senior Housing Preservation**, which ensures the maintenance of existing affordable units for disabled persons ages 55 and older; **Program 5, Americans with Disabilities Act**

(ADA) Improvements Program, which completes ADA-compliant infrastructure and repairs, contingent upon future CDBG funding; Program 10, Countywide Affordable Rental Housing Development, which provides financial assistance to supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles; Program 15, Housing Choice Voucher Program, which supports the provisions of five vouchers annually to facilitate rent subsidies for lower-income residents, including those with disabilities; Program 21, Older Adults Programs, which provides services such as Dial-A-Ride to residents with disabilities of all ages; Program 25, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities, which amends the MBMC to eliminate potential barriers for persons with disabilities and provides materials and programs; and Program 28, Specialized Housing Types to Assist Persons with Special Needs, which includes numerous amendments to the City’s Zoning Code to encourage special needs housing in the City and mitigate potential constraints to the development of housing for those with special needs.

## 7.2 Households Headed by Older Adults

HUD Federal housing programs define a household as an “elderly family” if the head of the household is at least 62 years of age or if two or more persons living together are all at least 62 years of age (24 CFR Section 5.403, Definitions). Typically, older adults are retired and have fixed incomes, and often have special needs related to housing location and construction. Even older adult homeowners, who are typically at an advantage because their housing payments may be fixed, are still subject to increasing utility rates and other living expenses. Moreover, many older adult residents may elect to remain in their own homes that are not designed to accommodate their special needs.

As shown in **Table 232, Older Adult Households by Tenure in the City (2019)**, there were 3,702 households (37 percent of total owners and 7 percent of total renters) in Manhattan Beach where the householder was 65 years or older.

Householder Age	Owner		Renter	
	Households	Percent	Households	Percent
Under 65 Years	5,921	63.4%	3,804	93.2%
65 to 74 Years	1,659	17.7%	141	3.5%
75 to 84 Years	1,234	13.2%	120	2.9%
85 years and Older	530	5.7%	18	0.4%
Total Households	9,344	100.0%	4,083	100.0%

Source: ACS B25007 5-Year Estimates, 2019

According to 2016 HUD CHAS data, there was a total of 4,160 older adult households in the City. Of those total households, approximately 8 percent earn less than 30 percent of the AMI (compared to 24 percent in the SCAG region), and approximately 18 percent earn less than 50 percent of the AMI (compared to 31 percent in the SCAG region). Table 24 provides a summary of older adult households in the City by income category, relative to the surrounding area.

<b>Table 24. Older Adult Households by Income and Tenure in Manhattan Beach (2020)</b>				
<b>Income Category</b>	<b>Owner</b>	<b>Renter</b>	<b>Total</b>	<b>Percent of Total Older Adult Households</b>
<30% HAMFI	225	105	330	7.9%
30%–50% HAMFI	370	45	415	10.0%
30%–50% HAMFI	455	75	530	12.7%
30%–50% HAMFI	360	30	390	9.4%
>100% HAMFI	2,330	165	2,495	60.0%
Total Households	3,740	420	4,160	100%
Source: SCAG 2020				
HAMFI = Housing Urban Development Area Median Family Income				

Many older adults are dependent on fixed incomes and/or have a disability. Older adult homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be addressed through smaller units, accessory dwelling units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs. Due to limited mobility, older adults typically need access to services (e.g., medical and shopping) and public transit. In terms of housing construction, older adults may need ramps, handrails, elevators, lower cabinets and counters, and special security devices to allow for greater access, convenience, and self-protection. The City recognizes that many older adults encounter temporary and permanent changes in their ability to conduct the tasks necessary for daily living. Programs of the City’s Housing Element aim to address those needs of older adult residents, including Program 4, Affordable Senior Housing Preservation, which aims to identify qualified affordable housing developers and maintain a reserve of affordable units for senior housing developments; Program 5, Americans with Disabilities Act (ADA) Improvements Program, which ensures ADA compliancy throughout the City; Program 15, Housing Choice Voucher Program, which continues a subsidized rent program for lower-income older adult residents; Program 21, Older Adults Programs, which provides and funds care and daily needs services for older adults; and Program 28, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities, which aims to mitigate constraints for Residential Care facilities serving seven or more person, including facilities for older adults.

In addition to the programs in the Housing Element that aim to address the needs of older adults during the planning period, there are many existing resources, services, and housing developments available to older adults in the City. Table 25, Communities, Resources, and Services for Older Adults, provides a detailed overview of the existing resources, services, and housing developments available for older adults in the City.

To facilitate the development of senior housing, as defined by Section 51.3 of the California Civil Code, the City qualifies senior housing as a multifamily residential use and can be constructed in all zones that allow for multifamily residential development. See Section 2.21, Senior Housing/Housing for Older Adults, in Appendix C, for a discussion on the City’s current zones that can accommodate housing developments for older adults.

**Table 25. Communities, Resources, and Services for Older Adults**

Community/Facility	Services
<p><u>Joslyn Community Center</u>  <u>1601 North Valley Drive</u>  <u>Manhattan Beach, CA 90266</u></p>	<ul style="list-style-type: none"> <li>• <u>Provides a variety of recreational activities, classes, and special programming for older adults.</u></li> <li>• <u>Location for the Manhattan Beach Senior Club.</u></li> </ul>
<b>Skilled Nursing</b>	
<p><u>Lawndale Healthcare &amp; Wellness Centre</u>  <u>15100 Prairie Avenue</u>  <u>Lawndale, CA 95014</u>  <u>310.679.3344</u></p>	<ul style="list-style-type: none"> <li>• <u>59-bed nursing and rehabilitation facility, providing 24-hour care, seven days a week.</u></li> <li>• <u>Long-term and short-term care. Services include a variety of therapies.</u></li> </ul>
<p><u>Providence Transitional Care Center</u>  <u>4320 Maricopa Street</u>  <u>Torrance, CA 90503</u>  <u>310.303.5900</u></p>	<ul style="list-style-type: none"> <li>• <u>115-bed facility providing skilled nursing services to patients in a post-acute care setting.</u></li> </ul>
<b>Independent Living</b>	
<p><u>Manhattan Beach Senior Villas</u>  <u>1300 Park View Avenue</u>  <u>Manhattan Beach, CA 90266</u>  <u>310.546.4062</u></p>	<ul style="list-style-type: none"> <li>• <u>104-unit affordable senior housing apartment for 65+ and 55+ for residents with disabilities persons 55+.</u></li> <li>• <u>As a condition of the project’s approval and as part of a settlement agreement upon sale of the property, 20 percent of the units are offered for very low-income households, 20 percent for low-income households, and 40 percent for moderate-income households in perpetuity. The remaining 20 percent of units are for market rate.</u></li> </ul>
<p><u>Heritage Pointe Senior Apartments</u>  <u>1801 Aviation Way</u>  <u>Redondo Beach, CA 90278</u>  <u>310.318.8418</u></p>	<ul style="list-style-type: none"> <li>• <u>135-unit apartment complex for 62+ lifestyles.</u></li> <li>• <u>Includes a variety of community amenities such as a pool, library, clubhouse, and disability access.</u></li> </ul>
<b>Assisted Living</b>	
<p><u>Josephine’s Garden Villa</u>  <u>521 North Rowell Avenue</u>  <u>Manhattan Beach, CA 90266</u>  <u>310.606.2110</u>  <u>License # 198203121</u></p>	<ul style="list-style-type: none"> <li>• <u>Six private rooms, accommodating one person per room.</u></li> <li>• <u>Services include continuous observations, care and supervision, daily needs assistance, medication management, and transportation.</u></li> </ul>
<p><u>Mansel Guest Home</u>  <u>317 South Aviation Avenue</u>  <u>Manhattan Beach, CA 90266</u>  <u>310.345.5561</u></p>	<ul style="list-style-type: none"> <li>• <u>6-bed, private home.</u></li> <li>• <u>Provides customized care programs, as well as workout programs, medication</u></li> </ul>

<a href="#">License # 197607748</a>	<a href="#">services, activities, and home-cooked meals.</a>
<a href="#">Sunrise Senior Assisted Living</a> <a href="#">250-400 North Sepulveda Boulevard</a> <a href="#">Manhattan Beach, CA 90266</a>  <a href="#">Note: Project approved in 2021 and is expected to be completed in the planning period.</a>	<ul style="list-style-type: none"> <li>• <a href="#">95-room and 115-bed facility.</a></li> <li>• <a href="#">Includes common areas such as foyer, parlor, bistro, dining rooms, and activity rooms)</a></li> <li>• <a href="#">Offers 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss.</a></li> </ul>

### 7.3 Large Families and Households

As defined by HCD, large households are defined as having five or more persons living within the same household. Large households are considered a special needs group because they require larger bedroom counts. According to recent Census data, approximately 37 percent of owner households and 21 percent of renter households in Manhattan Beach had only one or two members. Approximately 1 percent of renter households had five or more members, and approximately 5 percent of owners had five or more members (**Table 263, Household Size by Tenure in the City (2019)**). This distribution suggests that the need for large units with four or more bedrooms is expected to be much less than for smaller units.

<b>Table 263. Household Size by Tenure in the City (2019)</b>				
Household Size	Owner		Renter	
	Households	Percent	Households	Percent
1 person	1,603	11.94%	1,433	10.67%
2 persons	3,322	24.74%	1,424	10.61%
3 persons	1,638	12.20%	491	3.66%
4 persons	2,064	15.37%	570	4.25%
5 persons	506	3.77%	120	0.89%
6 persons	160	1.19%	31	0.23%
7 persons or more	51	0.38%	14	0.10%
Total Households	9,344	100%	4,083	100%

Source: ACS B25009 5-Year Estimates, 2019

**Table 27. Median Household Income by Household Size** shows that the median household income increases as there are more persons in a household. As discussed in **Section 5.4, Household Income and Extremely Low-Income Households**, the median household income for a household of 3 persons or more is greater than the City’s overall median income. Additionally, the smallest household size will have a median household income that is greater than the Los Angeles County median income. According to **Table 13**, the median household income for any household size in the City is greater than the low-income limit of the same household’s size category.

<b>Table 27. Median Household Income by Household Size</b>	
<b>Household Size</b>	<b>Median Household Income</b>
1-Person Households	\$80,318
2-Person Households	\$146,724
3-Person Households	\$230,750
4-Person Households	\$250,000+
5-Person Households	\$250,000+
6-Person Households	\$221,369
7-or-More-Person Households	\$250,000+
Source: 2019 ACS 5-Year Estimates B19019	

According to Census ACS estimates, most owner-occupied units have 1 occupant per room, with 59 units having up to 1.5 occupants per room, and no units with more than 1.5 occupants per room. Owner-occupied units, which is predominantly single-family homes, tend to have a sufficient number of rooms relative to household size. Furthermore, most renter-occupied units have 1 occupant per room, with 51 units having up to 1.5 occupants per room, and 37 units with 1.51 to 2 occupants per room. Renter-occupied units are more prone to overcrowding due to larger households. However, this number accounts for less than 1 percent of total housing units in the City. This indicates that there is an adequate supply of units with enough rooms relative to household size.

While the supply of larger units in the City might be sufficient, this does not include a measure of affordability. According to **Table 16**, the fair market rent for units with more than two bedroom increases to \$2,735 for a three-bedroom unit, and \$2,982 for a four-bedroom unit. Larger rental units tend to be more out of reach for lower-income household, which may explain the tendency to overcrowd. Based on the median household income for five- and six-bedroom households, it can be assumed that these rents would be affordable to most large-households in the City.

The City will continue to accommodate larger families and households through opportunities in the development of affordable housing and programs aimed to increase housing quality and capacity. Such examples of programs in the Housing Element include, **Program 2, Adequate Sites**, which establishes an overlay district to create opportunity for at least 402406 units of multifamily housing for lower-income households plus an additional buffer of at least 73 units; **Program 9, Countywide Affordable Home Ownership Program**, which provides funding to lower-income households looking to purchase a home through down payment and closing costs assistance for single-family homes, condominiums, and townhomes through the County’s Home Ownerships Program; **Program 10, Countywide Affordable Rental Housing Development**, which provides financial assistance to supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles; and **Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use Commercial Districts**, which streamlines the process by removing discretionary requirements and allows for the development and adoption of standards for multifamily residential housing in the CL, CD, and CNE zones.

## 7.4 Female- Headed and Single-Parent Households

Recent Census data reported that approximately 6 percent of owner households and 8 percent of renter households in Manhattan Beach were headed by single females (**Table 284, Household Type by Tenure in the City (2019)**). Approximately 4 percent of owner households were headed by single men, while 9 percent of renter households were headed by single men in the City. Single female- and male-headed households represent nearly a quarter of all households in the City (27 percent). This data is important when considering social service needs, such as childcare, recreation programs, and health care, which are of special concern to these households.

Household Type	Owner		Renter	
	Households	Percent	Households	Percent
Married-couple family	6,488	69.4%	1,443	35.3%
Male householder, no spouse present	406	4.3%	353	8.6%
Female householder, no spouse present	568	6.1%	323	7.9%
Non-family households	1,882	20.1%	1,964	48.1%
Total Households	9,344	99.9%	4,083	99.9%

Source: ACS S2501 5-Year Estimates, 2019

Female-headed households also tend to have comparatively low rates of homeownership, lower incomes, and high poverty rates, which often makes the search for affordable, decent, and safe housing more difficult. According to Census ACS data, 626 of the total 891 female-headed households had related children younger than 18 years. 20 percent (131 households) of those female-headed households with children were experiencing poverty in 2019, compared to less than 3 percent of total family households in the City who were experiencing poverty.

Childcare, early childhood education, and other family supportive services are particularly important for single female-headed households with children. These households can be assisted by many of the same strategies targeted to very low- and extremely low-income households in general with added resources and family support services.

## 7.5 Farm Workers/Employee Housing

The City is an urbanized community without any active agricultural activities. Recent Census data (ACS S2403 5-Year Estimates, 2019) indicates there were 26 farmworker individuals employed in “farming, fishing, forestry, and hunting occupations” in 2019. There is no farmworker-specific housing in the City.

The California Legislature enacted the Employee Housing Act to provide protection for persons living in privately owned and operated employee housing. The Employee Housing Act is specifically designed to ensure the health, safety, and general welfare of these residents, and to provide them a decent living environment. The Employee Housing Act also provides protection for the general public, which may be impacted by conditions in and around employee housing. According to the City, no known employee housing units as defined by the Employee Housing Act are located in the City.



## 7.6 People Experiencing Homelessness

In December 1993, the Los Angeles County Board of Supervisors and the Los Angeles Mayor and City Council established the LAHSA as an independent, Joint Powers Authority. LAHSA’s primary role is to coordinate the effective and efficient utilization of Federal and local funding in providing services to individuals experiencing homelessness in Los Angeles County. To support its mission, LAHSA oversees a comprehensive point-in-time count, with the most recent being completed in 2020 (HUD exempted LAHSA from conducting a 2021 point-in-time count due to the COVID-19 pandemic). The 2020 point-in-time data estimated that there more than 63,000 (sheltered and unsheltered) people experiencing homelessness in Los Angeles County.

As of the 2020 survey, there were an estimated 15 unsheltered people experiencing homelessness in the City. Various circumstances that may lead to homelessness include the following:

- Chronically homeless, single adults, including non-institutionalized, mentally disabled individuals, alcohol and drug abusers, older adult individuals with insufficient incomes, and others who voluntarily, or are forced, due to financial circumstances, to live on the streets
- Minors who have run away from home
- Low-income families that are temporarily homeless due to financial circumstances or are in the process of searching for a home (single-parent families, mostly female-headed, are especially prevalent in this group)
- Women (with or without children) who are escaping domestic violence

There are two categories of needs that should be considered in discussing the population experiencing homelessness: (1) transient housing providing shelter, usually on a nightly basis, and (2) short-term housing, usually including a more comprehensive array of social services to enable families to re-integrate themselves into a stable housing environment. **Table 295, Emergency and Supportive Housing Resources**, shows emergency and supportive housing providers in the area, including the name of the shelter, number of beds, description of services, and average number of beds available on any given night. There are no emergency and supportive housing providers in the City.

Table 295. Emergency and Supportive Housing Resources				
Provider	Address	Number of Beds	Services	Average Number of Beds Available on Any Given Night (Estimate)
<b>Beacon Light/Doors of Hope</b>	525 Broad Avenue, Wilmington, CA 90744	15/15	Bed, showers, clothing, and meals	2–3
<b>CES Crisis/Bridge Housing – US Vets Inglewood</b>	733 Hindry Avenue, Inglewood, CA 90301	30	Bed, showers, clothing, and meals	5–7

**Table 295. Emergency and Supportive Housing Resources**

Provider	Address	Number of Beds	Services	Average Number of Beds Available on Any Given Night (Estimate)
<b>CES Bridge Housing Program for Women – US Vets Long Beach</b>	2001 River Avenue, Long Beach, CA 90810	30	Bed, showers, clothing, and meals	1–2
<b>CES Bridge Housing Project Achieve – Catholic Charities</b>	1368 Oregon Avenue, Long Beach, CA 90813	20	Bed, showers, clothing, and meals	2–5
<b>Long Winter Shelter – Volunteers of America Los Angeles</b>	5571 Orange Avenue, Long Beach, CA 90805	65	Bed, showers, clothing, and meals	15–25

In 2017, the County passed Measure H, which created significant new resources to address homelessness, including providing to local jurisdictions the opportunity to apply for City Homelessness Plan Implementation Grants. In October 2017, a total of 47 cities were awarded grants, including the City of Manhattan Beach. The City intended to use its \$330,666 grant to coordinate with other jurisdictions, including the County, local stakeholders, and neighboring cities, to address homelessness in the community. The City recognized this would only be accomplished through an active constituency working together, including government, businesses, and the faith community, to tackle the causes of homelessness and implement solutions.

In August 2018, the City Council adopted the City’s Five-Year Plan to Address Homelessness in Our Community, and appointed a Homelessness Task Force. The plan, available on its website, contains goals aligned with the City’s and County’s objectives to address homelessness. The plan also contains an outline of collaborative opportunities, and demonstrates a correlation between the City’s efforts and the County’s Homeless Initiative Strategies. [Consistent with the City’s Homelessness Plan’s efforts to educate the community on various resources in the South Bay, the City has produced a resource guide for those experiencing homelessness, which is available on the City’s website. The guide summarizes a variety of resources offered near Manhattan Beach for those experiencing homelessness and contains a resource card that offers important phone numbers for quick reference.](#)

In November 2018, at the recommendation of the Homelessness Task Force, the City submitted a multi-jurisdictional proposal with the Cities of Redondo Beach and Hermosa Beach (all three collectively referred to as “South Bay Beach Cities”) to the County for outreach and education, coordination of regional efforts to address homelessness, and housing navigation services. In April 2019, the Los Angeles County Homeless Initiative announced the award of Measure H grant funding to the South Bay Beach Cities totaling \$330,665 toward homeless coordination, training, and housing navigation services.

In September 2019, the City, along with regional partners the Cities of Redondo Beach and Hermosa Beach, solicited proposals from qualified homeless service providers. Subsequently, the City Council awarded a subcontract to Harbor Interfaith Services to provide three full-time-equivalent positions to assist individuals and families experiencing homelessness in the South Bay Beach Cities. Harbor Interfaith Services was established in 1987 and provides a variety of services to individuals and families, including a 90-day emergency shelter, 18-month transitional housing program, and a Family Resources Center.

In addition to resources designed to aid individuals experiencing homelessness, the City's Housing Element also refers directly to this population in its programs. This includes **Program 10, Countywide Affordable Rental Housing Development** which provides financial assistance for participating cities to develop affordable rental housing and Special Needs housing that may combat homelessness; **Program 28, Specialized Housing Types to Assist Persons with Special Needs**, which eases the restrictions of the construction of emergency shelters and low-barrier navigation centers in certain zones; and **Program 29, Support for Those Experiencing Homelessness**, which aims to provide resources and assistance for those experiencing homelessness in the City.

The City continues to provide information regarding services available for those experiencing homelessness on its website via its Homeless Resource Guide.<sup>1</sup>

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<sup>1</sup> <https://www.manhattanbeach.gov/home/showpublisheddocument/40272/636988627556170000>

## 8 Assisted Housing at Risk of Conversion

Section 65583 of the California Government Code was amended in 1991, requiring an analysis of subsidized units and a description of programs to preserve assisted housing developments. One of the foremost housing problems in the State involves the loss of affordability restrictions on a substantial portion of the government-assisted rental housing stock. Much of this housing is “at-risk” of conversion from affordable housing stock reserved predominantly for lower-income households to market-rate housing. Assisted housing developments (or at-risk units) are defined as multifamily, rental housing complexes that receive government assistance under Federal, State, and/or local programs, or any combination of rental assistance, mortgage insurance, interest reductions, and/or direct loan programs, and are eligible to convert to market-rate units due to termination (opt-out) of a rent subsidy contract, mortgage prepayment, or other expiring use restrictions within 10 years of the beginning of the Housing Element planning period.

HUD maintains a list of notices (6 and 12 month) received by HUD pursuant to California’s notice requirements (Government Code Sections 65863.10 and 65863.11). Private owners of assisted multifamily rental housing units who are considering no longer providing rental restrictions and converting restricted units to market-rate units must provide notice to HUD. According to information provided by HUD, no conversion notices have been filed on behalf of any affordable housing providers in the City, and there are 0 low-income units in the City that are at risk of converting to market rate in the next 5 to 10 years.

## 9 Low- and Moderate-Income Housing in the Coastal Zone

Government Code Section 65590 contains requirements for the replacement of low- and moderate-income housing within the coastal zone when such housing is demolished or converted to other uses, subject to certain limitations. In accordance with Government Code Section 65590(b)(1), replacement housing is not normally required for the conversion or demolition of a residential structure that contains fewer than three dwelling units, or, in the event that a proposed conversion or demolition involves more than one residential structure, the conversion or demolition of 10 or fewer dwelling units. The majority of development in the City’s Coastal Zone consists of high-cost market-rate single-family and multifamily housing. Government Code Section 65590(b)(3) states that replacement housing must be provided only where feasible if the local jurisdiction has fewer than 50 acres, in aggregate, of privately owned vacant land that is available for residential use. The City is built out and has only a nominal amount of vacant land, well below the 50-acre threshold. Thus, the City has not had occasion to administer the provisions of Section 65590, nor had occasion to maintain records regarding the income level of past housing occupants. No low- or moderate-income housing has been provided or required pursuant to Section 65590 in the City, whether as replacement units or inclusionary units. This is primarily due to existing land use patterns consisting of small lots that provide for only a few units on a site. Because the City does not have the ability to construct or otherwise subsidize the construction of new housing through redevelopment, it must rely on its existing incentives to promote the development of affordable housing in the Coastal Zone. [See a full discussion related to the Coastal Zone in Section 2.1.4, Coastal Zone, of Appendix C.](#)

# Appendix C: Constraints and Zoning Analysis

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# 1 Introduction

This appendix of the Housing Element is concerned with the identification of constraints that may affect the development of housing, especially affordable housing. The following constraints are considered in this analysis:

- *Governmental Constraints* refer to regulations, ordinances, and/or controls that may impede the development of new housing or otherwise increase the cost of housing.
- *Market Constraints* refer to economic and market factors that may affect the cost of new housing development.
- *Environmental Constraints* refer to aspects of the environment (e.g., vacant land, utilities, natural hazards) that may affect the cost and/or feasibility of development.

Where a constraint to development is identified, a policy response is identified that indicates the actions the City of Manhattan Beach (City) is pursuing, or intends to pursue, as a means to eliminate or reduce the effects of that particular constraint on housing development, if feasible.



## 2 Governmental Resources and Constraints

Governmental constraints are policies, standards, requirements, and actions imposed by various levels of government upon land and housing ownership and development. These constraints may include building codes, land use controls, growth management measures, development fees, processing and permit procedures, and site improvement costs. Resources available to development exist in the form of development incentives, bonus programs, and infrastructure.

### 2.1 Land Use Controls (General Plan and Zoning)

Land use controls include General Plan policies and zoning designations, and the resulting use restrictions, development standards, and permit processing requirements.

#### 2.1.1 General Plan

Every city in California must have a General Plan that establishes policy guidelines for all development within the city. The General Plan is the foundation of all land use controls in a jurisdiction. The Land Use Element of the General Plan identifies the location, distribution, and density of the land uses within the city. General Plan residential densities are expressed in dwelling units per acre. Under State law, General Plan elements must be internally consistent, and a city’s zoning must be consistent with the General Plan. Thus, the Land Use Element must provide suitable locations and densities to implement the policies of the Housing Element.

The Manhattan Beach General Plan Land Use Element includes three residential land use designations: Low-Density Residential, Medium-Density, and High-Density Residential. As shown in **Table 1, Residential Land Use Categories in the City’s General Plan**, the Low-Density designation’s maximum density permitted ranges from 5.8 to 16.1 dwelling units per acre, the Medium-Density designation’s maximum density permitted ranges from 11.6 to 32 dwelling units per acre, and the High-Density designation’s maximum density permitted ranges from 43.6 to 51 dwelling units per acre.

<b>Table 1. Residential Land Use Categories in the City’s General Plan</b>			
<b>Area District</b>	<b>Low-Density Residential (Maximum Density)</b>	<b>Medium-Density Residential (Maximum Density)</b>	<b>High-Density Residential (Maximum Density)</b>
District I – Hill Section/ Eastside so. of Manhattan Beach Blvd.	5.8 du/acre	11.6 du/acre	43.6 du/acre
District II – Tree Section/ Eastside no. of Manhattan Beach Blvd.	9.5 du/acre	18.9 du/acre	43.6 du/acre
District III – Beach	16.1 du/acre	32.3 du/acre	51.3 du/acre
District IV – El Porto	N/A	N/A	51.0 du/acre

Source: City of Manhattan Beach, General Plan Land Use Element, 2003.  
du/acre = dwelling units per acre; N/A = not applicable

In addition to the residential land use designations, residential or mixed-use development is permitted in several commercial land use designations, as described below.

### *Downtown Commercial*

The Downtown Commercial land use category applies only to the downtown area, an area of 40+ blocks that radiates from the intersection of Manhattan Beach Boulevard and Manhattan Avenue. The downtown area provides locations for a mix of commercial businesses, residential uses, and public uses, with a focus on pedestrian-oriented low-intensity commercial businesses that serve Manhattan Beach residents and visitors. Multifamily residential projects can be developed in accordance with the development standards for the High-Density Residential designation. The height limit in this district ranges from 26 feet to 30 feet, depending on location.

### *Local Commercial*

The Local Commercial land use category provides areas for neighborhood-oriented, small-scale professional offices, retail businesses, and service activities that serve the local community. Permitted uses are generally characterized by those that generate low traffic volumes, have limited parking needs, and generally do not operate during late hours. Residential uses can be developed at densities consistent with the High-Density Residential designation. The height limit is 30 feet.

### *North End Commercial*

Properties designated North End Commercial lie at the north end of the City, along Highland Avenue and Rosecrans Avenue between 33rd and 42nd Streets. Commercial uses are limited to small-scale, low-intensity neighborhood-serving service businesses, retail stores, and offices. Restaurant and entertainment establishments are permitted only where zoning regulations can adequately ensure compatibility with residential uses. The maximum permitted floor area factor is 1.5:1. Residential uses can be developed at densities consistent with the High-Density Residential designation, with a height limit of 30 feet.

### *Mixed-Use Commercial*

The Mixed-Use Commercial land use category accommodates the parking needs of commercial businesses on small lots that front Sepulveda Boulevard and abut residential neighborhoods. In recognition of the need to ensure adequate parking for businesses and to protect residential uses from activities that intrude on their privacy and safety, this category limits commercial activity on commercial lots adjacent to residences, and establishes a lower floor area factor limit of 1.0:1 for commercial uses. Uses permitted are similar to those allowed in the General Commercial category. Residential uses are conditionally permitted, consistent with the Low-Density Residential category and the D-6 Oak Avenue Zoning Overlay.

## 2.1.2 Zoning Code

The Zoning Code is the primary tool for implementing the General Plan. It is designed to protect and promote public health, safety, and welfare. The City regulates the permitted uses, locations, density, and scale of residential development through the Manhattan Beach Municipal Code (MBMC). Chapter 10 of the MBMC, known as the Planning and Zoning Ordinance (Zoning Code), includes residential and nonresidential zoning districts that control the use and development standards of specific sites, and influence the development of housing within the City. Note that the Coastal Zone within the City of

Manhattan Beach has its own set of land use and development regulations, which primarily match those of Area Districts III and IV from the Zoning Code.

### 2.1.2.1 Zoning Districts

Each zone that permits residential uses regulates the residential use permitted, lot size, density, and parking requirements. While regulations such as setbacks, lot size, and lot coverage can contribute to the number of dwelling units that can be developed on a lot, residential densities are primarily limited by established maximum densities. The Zoning Code contains eight zoning districts (zones) that permit residential development: five residential zones (Single-Family Residential District [RS], Medium-Density Residential District [RM], High-Density Residential District [RH], Residential Planned Development District [RPD], and Residential Senior Citizen District [RSC]) and three commercial zones (Local Commercial District [CL], Downtown Commercial District [CD], and North End Commercial District [CNE]).

**Table 2, Residential Uses Permitted by Zoning District**, provides an overview of all residential uses permitted by zoning district.

#### 2.1.2.1.1 Residential Districts

The following provides a brief description of each residential zone's purpose:

##### Single-Family Residential (RS) District

To provide opportunities for single-family residential land use in neighborhoods, subject to appropriate standards.

##### Medium-Density Residential (RM) District

To provide opportunities for multiple residential uses, including duplexes, town houses, apartments, multi-dwelling structures, or cluster housing with landscaped open space for residents' use.

##### High-Density Residential (RH) District

To provide opportunities for an intensive form of residential development, including apartments and town houses with relatively high land coverage, at appropriate

##### Residential Planned Development (PD) District

To encourage a diverse living environment and to facilitate adequate, economical and efficient provision of community facilities, streets, utilities, and parks in a landscaped setting.

##### RSC Residential Senior Citizen (RSC) District

To facilitate the development of quality senior housing by providing a mechanism to review and approve housing specifically designed for senior-citizen households.

It should be noted that the RPD zone, encompasses approximately 77 acres, but is a completely built-out, gated planned community built in the 1990's. The community consists of approximately 400 town and court homes and 122 estate single-family homes. The RSC zone encompasses approximately 4.7 acres on a total of three parcels in the City, which are built-out with two existing developments for older adults. As further discussed in **Section 2.1.3, Development Standards**, [the designation of, or regulations](#)

[of, these zones in no way constrain development, as these zones apply to limited areas of the City that are built out.](#)

#### 2.1.2.2 Area Districts

The Zoning Code also helps to preserve the character and quality of residential neighborhoods consistent with the character of the four area districts in the City. The Zoning Code provides for land use and development regulations, including residential standards, broken down by zone and area district. The four area districts are as follows:

- Area District I – South of Manhattan Beach Boulevard and east of Valley/Ardmore
- Area District II – North of Manhattan Beach Boulevard and east of Valley/Ardmore and Bell
- Area District III – Coastal area south of Rosecrans
- Area District IV – Coastal areas north of Rosecrans (El Porto)

#### 2.1.2.3 Design Overlay Districts

In addition to zoning requirements for the base districts, the City has established eight Design Overlay Districts that establish development standards specific to the unique needs of each Overlay District. [These additional development standards are objective and do not require any form of design review board/commission/panel or design related findings/requirements. The requirements of these overlay districts instead act as additional objective development standards and are treated as supplemental zoning code standards.](#) -These Overlay Districts [that apply to residential uses](#) are as follows:

- **D1 – Rosecrans Avenue** [applies to Single-Family Residential and Medium-Density Residential Zoning Districts within the overlay](#) where higher fences in the front-yard setback area are needed to reduce traffic noise; in this Overlay District, front yard fences up to 6 feet in height may be constructed as close as 3 feet from the front or street side property line. [This overlay covers the northern half of four blocks abutting Rosecrans Avenue. Fencing requirements are needed to protect residents from noise and pollution from a highly trafficked road and do not pose a constraint to development, as the standards are objective, do not increase the time of permit processing, and do not increase the cost of production. Further, none of the sites identified in the Sites Inventory fall within the D1 overlay.](#)
- **D2 – 11<sup>th</sup> Street** [applies to High-Density Residential Zoning Districts within the overlay. The overlay covers nine small lots on one block](#) totaling approximately 1.34 acres at 11th Street and Harkness, ~~where~~ [This overlay requires](#) limitations on building height and density are needed to minimize building bulk and to buffer adjoining residences; high-density residential uses in this area are limited to a maximum height of 26 feet and maximum density of 1 dwelling per 1,800 square feet of lot area. [This is a reduction of 4 feet in height and a reduction in density by approximately 20 dwelling units per acre as compared to the base zone. The majority of the parcels within this overlay that covers one block are zoned for commercial uses and the reduction in regulations is needed to protect future residents from existing commercial uses that may be disruptive to residents. Because this is only one block within the City, and the reduction in development standards is minimal and does not increase the time associated with the development process through additional review, this is not considered a](#)

constraint to development. Further, none of the sites identified in the Sites Inventory fall within the D2 overlay.

- D3 – ~~Gaslamp Neighborhood~~, **Gaslamp Neighborhood**, applies only to Single Family Residential Zones within the overlay where additional development standards apply to preserve the character of the neighborhood. ~~single-family neighborhood where special design standards and review procedures are needed to preserve existing neighborhood character.~~ Additional standards include:

- A maximum height of two stories, although the 26 feet permitted by the base zone still applies.
- Environmental assessment in advancement of the demolition of structures on a site with two or more lots.
- Second story setback of 10% of the buildable depth of the lot; 10 times the lot width; with the exception of one architectural projection and eaves.
- For buildings that exceed 22 feet in height, a minimum roof pitch of 3 foot rise in 12 feet of run is required.

The additional development standards do not pose a constraint to development; however, the environmental assessment poses a constraint to development in that it would increase the time and cost associated with redevelopment of the area. While the environmental assessment poses a constraint to development within this area, this does not pose a constraint to meeting the City’s housing needs as this is a built-out single-family neighborhood and no sites within this area have been identified in the Sites Inventory for accommodating the City’s RHNA.

- D4 – ~~Traffic noise impact area~~ **Noise Impact Areas** applies only to Single Family Residential Zones within the overlay which covers two linear blocks abutting Aviation Boulevard and parcels abutting Marine Avenue between Pacific and Meadows Avenue. Development standards ~~where permit higher fences of up to 8 feet in height are needed to reduce traffic noise; fences up to 8 feet in height are permitted.~~ This overlay does not pose a constraint to development as it does not mandate fences, but instead permits them. Additionally, no sites within the Sites Inventory have been identified in the D4 overlay.

- D5 – **North End Commercial** overlay applies to a three and a half block portion of the Highland Avenue corridor for sites that are zoned CNE. Additional development standards ~~where special design standards are needed for the north end commercial area to~~ better accommodate additional residential development in this commercial area. Additional development standards that apply to residential uses include:

- Lots that are 2,500 square feet or larger must include planter boxes at the pedestrian level along Highland Avenue.
- The third story shall be setback a minimum of 10 feet from the front-line setback.
- Residential developments on the west side of Highland Avenue may not have vehicular access from Highland Avenue.

The additional development standards of the D5 overlay do not pose a constraint to development as the standards are objective, do not increase the time associated with development or permitting, and do not increase the cost of development. Additionally, only two sites identified in the Sites Inventory fall within the D5 overlay.

- D6 – Oak Avenue applies only to those sites that are zoned for single-family residential in sections along Oak Avenue. These sites abut commercial sites that are along the western side of Sepulveda Boulevard. Additional development standards are in place to create a smooth transition between those single-family residential uses that are adjacent to commercial uses. Additional development standards that apply to residential uses include:

- A minimum side setback of 5 feet.
- For buildings that exceed 22 feet in height, a minimum roof pitch of 3 foot rise in 12 feet of run is required.
- ~~where special design standards, landscaping, and buffering requirements for commercial uses are needed to allow commercial use of property in a residential area adjacent to Sepulveda Boulevard.~~

The additional development standards of the D6 overlay do not pose a constraint to development as the standards are objective, do not increase the time associated with development or permitting, and do not increase the cost of development. Additionally these standards only apply to single family residential uses and no sites identified within the Sites Inventory fall within this overlay.

- D7 – Longfellow Drive applies only to those sites zoned for single-family residential uses within the Longfellow Drive neighborhood. ~~area~~This area covers 18 acres of a single-family neighborhood, including residential lots in Tract 14274 located on Longfellow Drive, Ronda Drive, Terraza Place, Duncan Drive, and Kuhn Drive. ~~where a special minimum lot area requirement of 17,000 square feet and restrictions on subdivision are needed to preserve the character of the neighborhood, including views and privacy, and prevent unwanted impacts from increased traffic, bulk, and crowding that would result from increased density.~~ Additional development standards for this area require a minimum lot area of 17,000 square feet, and further subdivision of any lot within the district is prohibited.

The additional development standards applied by the D7 overlay do not pose a constraint to development as the standards are objective, do not increase the time associated with development or permitting, and do not increase the overall cost of development. Additionally, this is a built-out single-family subdivision and none of the sites identified in the Sites Inventory fall within this overlay.

- D8 – Sepulveda Boulevard Corridor applies to those sites zoned CG on specified sites abutting Sepulveda Boulevard. Sites zoned CG do not permit residential uses, and therefore the development standards applied by this overlay to not apply to residential uses and do not constrain the development of residential uses. ~~Overlay where more flexible development standards are needed to continue to promote uses that contribute to economic vitality within the General Commercial (CG) zone. Only hotel uses are eligible for flexible development~~

~~standards. All other land uses shall comply with all requirements contained within Chapter 10.16 of the Planning and Zoning Code.~~

~~Several of the Design Overlays, such as D1 and D4, are more permissive than the base district, allowing higher walls closer to the property lines to provide protection from excessive noise. Others, such as Design Overlays D3 and D5, affect minor design issues, such as requiring planter boxes at the pedestrian level, that are not anticipated to constrain the delivery of additional housing. In fact, Design Overlay D3 would act to preserve existing structures in areas subject to “mansionization” pressures.~~

~~It should be noted that Design Overlay D2 reduces the number of dwellings permitted on each of the affected lots (Assessor’s Parcel Numbers 4164-001-013 to 15; 4164-001-017 and 018; 4164-001-21; 4164-001-032 to 036; 4164-001-039 to 044; and 4164-001-049 to 053). Lots in this area are each approximately 6,500 square feet. Base district requirements of 1,000 square feet per unit would permit six dwellings on each lot, for a total of 54 dwelling units. Under Design Overlay D2, only three dwellings are permitted on an individual lot, for a total of 27 units, a 27-unit reduction in maximum buildout. However, most of these parcels have existing multifamily uses. These regulations are consistent with the Covenants, Conditions, and Restrictions recorded at the time this tract was originally subdivided.~~

~~Design Overlay 7 increases minimum lot area from 7,500 square feet under the base district to 17,000 square feet. Although this is a significant difference, at more than double the lot size, the terrain in this area is such that higher density would be unlikely, unless very costly landform modification were to be undertaken. In addition, the 33 lots within this overlay are located in the Low-Density Residential designation within Area District I and have existing single-family uses. These regulations are consistent with the original private Covenants, Conditions, and Restrictions that were recorded at the time the tract was originally subdivided.~~

~~Design Overlay 8 provides more flexible development standards for hotel uses needed to continue to promote desirable development, uses, and economic vitality within the General Commercial (CG) zone; therefore, the flexibilities afforded by this overlay do not impact residential unit production.~~

The Design Overlay Districts apply additional standards to specified areas that supplement the applicable base zone as detailed above. While these are referred to as “Design Overlay Districts”, the City does not have a design review process or design guidelines. Rather, the City has additional objective standards that apply to identified areas. The City does not regulate design through any form of a design review board, commission, panel or any design-related findings or requirements.

Senate Bill (SB) 330 (2019) prohibits any non-objective design standard adopted after January 1, 2020. The City is currently in compliance with this requirement. Through implementation of **Program 1720, Objective Design Standards**, of the Housing Element, the City will continue to ensure that any new design standards developed and imposed by the City shall be objective.

#### 2.1.2.4 Allowable Uses by Definition

- Accessory Dwelling Unit (ADU): Has the meaning ascribed in Government Code Section 65852.2, as the same may be amended from time to time. Notwithstanding the foregoing, the term “ADU” does not include a guest house (or accessory living quarters), as defined in Municipal Code Section 10.04.030. “Attached ADU” means an ADU that is constructed as a

physical expansion (i.e., addition) of a primary dwelling, or the remodeling of a primary dwelling, and shares a common wall with a primary dwelling. “Detached ADU” means an ADU that is constructed as a separate structure from any primary dwelling, and does not share any walls with a primary dwelling.

- Accessory Structure: No definition. See “Guest House.”
- Guest House (or Accessory Living Quarters): Any living area located within a main or an accessory building that does not have direct interior access to the dwelling unit. Such quarters shall have no kitchen facilities and shall not be rented or otherwise used as a separate dwelling unit. Such guest quarters, or accessory living quarters, shall be permitted only on a lot with one single-family residence, except as provided for in MBMC Section 10.52.050(F), Residential Zones-Adjacent Separate Lots with Common Ownership. This guest house, or accessory living quarters, shall be a maximum of 500 square feet in size, limited to one habitable room, and contain a maximum of three plumbing fixtures.
- Community Care Facility: See “Residential Care, Limited.”
- Day Care Facility:  
**Day Care, Small Family Home.** Non-medical care and supervision of six or fewer persons, including those who reside at the home, on a less than 24-hour bases. This classification includes only those services and facilities licensed by the State of California.  
**Day Care, Large Family Home.** Non-medical care and supervision of 7 to 12 children, including those who reside at the home, on a less than 24-hour bases. This classification includes only those services and facilities licensed by the State of California.
- Dwelling, Single-Family: A building containing one dwelling unit.
- Dwelling, Two-Family: See “Dwelling, Multifamily.”
- Dwelling, Multifamily: A building containing two or more dwelling units.
- Family: A single individual or two or more persons living together as a single housekeeping unit in a dwelling unit.
- Home Occupation: No definition. Per MBMC Section 10.52.070, a home occupation in an R district shall require a Home Occupation Permit, obtained by filing a completed application form with the Community Development Director. The Community Development Director shall issue the permit upon determining that the proposed home occupation complies with the requirements of this.
- Junior Accessory Dwelling Unit (JADU): Has the meaning ascribed in Government Code Section 65852.22, as the same may be amended from time to time. Said code defines JADU as “a unit that is no more than 500 square feet in size and contained entirely within a single-family residence. A junior accessory dwelling unit may include separate sanitation facilities, or may share sanitation facilities with the existing structure.”
- Mobile Home: See “Manufactured Home.”
- Manufactured Home: A modular housing unit on a permanent foundation that conforms to the National Manufactured Housing Construction and Standards Act. For purposes of this definition, a mobile home is considered a manufactured home.
- Residential Care, General: Twenty-four-hour non-medical care for seven or more persons, including wards of the juvenile court, in need of personal services, supervision, protection, or



assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California.

- Residential Care, Limited: Twenty-four-hour non-medical care for six or fewer persons in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California.
- Residential Condominium: An estate in real property consisting of an undivided interest in common in a portion of a parcel of real property together with a separate interior space in a residential, industrial, or commercial building on the real property, such as an apartment, office, or store. A condominium may include, in addition, a separate interest in other portions of the real property.
- Second Unit: No definition. See “Accessory Dwelling Unit.”

Table 2 provides an overview of all residential uses permitted by zoning district.

**Table 2. Residential Uses Permitted by Zoning District**

Uses	RS	RM	RH	RPD	RSC	CL	CD	CNE
Accessory Dwelling Unit	P	P	P	<u>P</u>	<u>P</u>	P	P	P
Accessory Structure <sup>1</sup>	P/U	P/U	P/U	<u>P/U</u>	<u>P/U</u>	—	—	—
Day Care, Small Family Home	P	P	P	<u>P</u>	<u>P</u>	P	U	L <sup>2</sup>
Day Care, Large Family Home	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>	<u>L<sup>3</sup></u>	<u>L<sup>3</sup></u>	L <sup>3</sup>	L <sup>3</sup>	L <sup>3</sup>
Emergency Shelters <sup>4</sup>	—	—	—	<u>—</u>	<u>—</u>	—	—	—
Group Residential	—	—	U	<u>—</u>	<u>U</u>	—	—	—
Home Occupation	Home Occupation Permit <sup>5</sup>					—	—	—
Manufactured Housing (on a permanent foundation)	P	P	P	<u>P</u>	<u>P</u>	—	—	—
Mixed-Use	—	—	—	<u>—</u>	<u>—</u>	U	U	U
Multifamily (5 or fewer units) <sup>6</sup>	—	P	P	<u>P</u>	<u>U</u>	U	U	U
Multifamily (6 or more units) <sup>6</sup>	—	PDP/SDP	PDP/SDP	<u>PDP/SDP</u>	<u>U</u>	U	U	U
Residential Care, General <sup>7</sup>	—	—	U	<u>U</u>	<u>U</u>	—	—	—
Residential Care, Limited	P	P	P	<u>P</u>	<u>P</u>	—	—	—
Single-Family	P	P	P	<u>P</u>	<u>P</u>	U	U	L <sup>8,7</sup>
Supportive and Transitional Housing	Permitted as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone.							

Source: Chapter 10, Planning and Zoning of the MBMC, 2021.

RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; CL = Local Commercial; CD = Downtown Commercial; CNE = North End Commercial  
P = Permitted; U = Use Permit; L = Limited (see additional use regulations); — = Not Permitted; PDP = Precise Development Plan; SDP = Site Development Permit

- See MBMC Section 10.52.050, Accessory Structures.
- Single-family residential permitted if located (1) on a site which fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a Use Permit is required.
- Application for an administrative large-family day care permit to the Director of Community Development is required and shall be made on forms provided by the City. No hearing on the application for a permit shall be held before the decision is made by the Director unless a hearing is requested by the applicant or other affected person. The Director's decision shall be based on whether or not the proposed use would be compatible with the surrounding neighborhood.
- Emergency shelters are permitted by-right in the Industrial Park (IP) District and the Public and Semipublic (PS) District.
- Per MBMC Section 10.52.070, a home occupation in an R district shall require a Home Occupation Permit, obtained by filing a completed application form with the Community Development Director.
- A Use Permit is required for any condominium development or conversion of three or more units.
- Residential Care, General facilities are also permitted in the General Commercial (CG) District and Public and Semipublic (PS) District on approval of a Use Permit.
- Single-family residential permitted if located (1) on a site which fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a Use Permit is required.

### 2.1.2.5 Single-Family Dwelling Units

As shown in **Table 3, Single-Family Dwelling Units Permitted by Zoning District**, the City permits single-family detached dwelling units in accordance with the Zoning Code in the RS, RM, RH, Residential Planned Development (RPD), and Residential Senior Citizen (RSC), and in the CL, CD, and CNE zones subject to a Use Permit.

Table 3. Single-Family Dwelling Units Permitted by Zoning District								
Use	RS	RM	RH	RPD	RSC	CL	CD	CNE
Single-Family Residential	P	P	P	P	P	U	U	L <sup>1</sup>
<p>Source: Chapter 10, Planning and Zoning of the MBMC, 2021.</p> <p>RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; RPD = Residential Planned Development; RSC = Residential Senior Citizen; CL = Local Commercial; CD = Downtown Commercial; CNE = North End Commercial</p> <p>P = Permitted; U = Use Permit; L = Limited (see additional use regulations)</p> <p>1. Single-family residential permitted if located (1) on a site which fronts on Crest Drive; or (2) on the rear half of a site which fronts on Highland Avenue; or (3) on a site which fronts on the east side of Highland Avenue between 38th Place to the south and Moonstone Street to the north; or (4) on a site which does not abut Rosecrans Avenue or Highland Avenue; otherwise a Use Permit is required.</p>								

Planning and Zoning Code requirements applicable to single-family development are standard in nature and do not cause undue constraints to single-family development.

### 2.1.2.6 Multifamily Dwelling Units

As shown in **Table 4, Multifamily Dwelling Units Permitted by Zoning District**, the City permits multifamily dwelling units in accordance with the Zoning Code in the Medium-Density Residential (RM), High-Density Residential (RH), Residential Planned Development (RPD), Residential Senior Citizen (RSC), Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones.

Multifamily housing is permitted in most zones allowing residential uses, except for the Single-Family Residential (RS) zone. In the RSC, CL, CD, and CNE zones, a Use Permit is required at any density. In the RM, RH, and RPD zones, multifamily uses are permitted by-right with five or fewer dwelling units. If six or more dwelling units are proposed, a Precise Development Plan (PDP) or Site Development Permit (SDP) are required, depending on whether or not the development qualifies for a density bonus.

Residential developments with six or more units that do not receive a density bonus shall apply for an SDP requiring approval by the Planning Commission. Residential developments that qualify for a density bonus shall apply for an administrative PDP requiring a decision by the Community Development Director. PDPs are intended to encourage the development of affordable housing through a streamlined permitting process.

To mitigate potential constraints to development and further incentivize affordable housing in the City, the City will remove the discretionary requirements for multifamily projects meeting the minimum requirements for a density bonus in the CL, CD, and CNE zones. The City will review and amend the Zoning Code to permit multifamily housing in the CL, CD, and CNE zones without requiring approval of a Use Permit, and all projects that use the State density bonus will be eligible for streamlined approvals through implementation of **Program 18**, of the Housing Element.

Table 4. Multifamily Dwelling Units Permitted by Zoning District								
Multifamily Residential <sup>1</sup>	RS	RM	RH	RPD	RSC	CL	CD	CNE
Five or fewer (reviewed by Director)	—	P	P	P	U	U	U	U
Six or more (Planning Commission)	—	PDP/SDP	PDP/SDP	PDP/SDP	U	U	U	U

Source: Chapter 10, Planning and Zoning of the MBMC, 2021.

RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; RPD = Residential Planned Development; RSC = Residential Senior Citizen; CL = Local Commercial; CD = Downtown Commercial; CNE = North End Commercial

P = Permitted; U = Use Permit; — = Not Permitted; PDP = Precise Development Plan; SDP = Site Development Permit

1. A Use Permit is required for any condominium development or conversion of three or more units.

2.1.2.7 Mobile/Manufactured Homes

Manufactured housing can be constructed for much less than the cost of traditional building. Building various standardized modules in one location results in savings due to economies of scale and greatly reduced waste of building materials. Factory-built housing designed for placement on fixed foundations can be highly attractive and virtually indistinguishable from standard construction. In addition, current factory-built housing is typically built to higher standards for energy conservation.

MBMC Section 10.52.100 dictates manufactured housing is permitted in all R districts (RS, RM, RH) not occupied by another dwelling. The housing is subject to a set of general requirements shown in **Table 5, Manufactured Housing Requirements**, and base residential zone district regulations, as outlined in MBMC Chapter 10.12. These criteria are not unduly burdensome and would not prevent the establishment of manufactured housing on residential lots. However, while manufactured homes are included as a multifamily residential use classification in the Zoning Code, MBMC Section 10.52.100 dictates that manufactured housing must be located in an R district, and that it is not allowed as an additional unit on an already developed lot or as an accessory unit on an already developed lot.

The Zoning Code’s current inconsistencies with State law may pose a constraint to development. As such, as part of implementation of **Program 174, Manufactured Housing**, of the Housing Element, the City will amend the Zoning Code to clarify that manufactured housing is treated as a single-family dwelling and is permitted in all of the same zones and same manner as other single-family structures, including in commercial or mixed-use zones.

Government Code Sections 65852.3 through 65852.5 require that manufactured homes be permitted in single-unit districts subject to the same land use regulations as conventional homes. Government Code Section 65852.7 requires that cities and counties allow mobile home parks (including condominium and cooperative parks) on all land planned and zoned for residential land use. The MBMC does not currently define mobile home parks; therefore, it also does not identify zoning districts in which this use is permitted. **Program 174** of the Housing Element will amend the MBMC to permit mobile home parks on all land zoned or planned for residential land uses as required by State law.

<b>Table 5. Manufactured Housing Requirements</b>	
<b>General Requirements</b>	Manufactured homes may be used for residential purposes if such manufactured home has been granted a Certificate of Compatibility and is located in an R district. Manufactured homes also may be used for temporary uses, subject to the requirements of a temporary Use Permit issued under Chapter 10.84.
<b>Requirements for Certificates of Compatibility</b>	Manufactured homes may be located in any R district where a single-family detached dwelling is permitted, subject to the same restrictions on density and to the same property development regulations, provided that such manufactured home receives a Certificate of Compatibility. The Community Development Director shall issue such certificate if the manufactured home meets the design and locational criteria of this subsection.  The certificate shall be valid for two (2) years and may be renewed for subsequent periods of 2 years if the location and design criteria of this section are met. More specifically, the location and design of manufactured homes shall comply with the following criteria in order to protect neighborhood integrity, provide for harmonious relationship between manufactured homes and surrounding uses, and minimize problems that could occur as a result of locating manufactured homes on residential lots.
<b>Location Criteria</b>	Manufactured homes shall not be allowed: <ul style="list-style-type: none"> <li>a. On substandard lots that do not meet the dimensional standards of Chapter 10.12;</li> <li>b. As an additional unit on an already developed lot;</li> <li>c. As an accessory building or use on an already developed lot; or</li> <li>d. On lots with an average slope of more than ten percent (10%), or on any portion of a lot where the slope exceeds fifteen percent (15%).</li> </ul>
<b>Design Criteria</b>	Manufactured homes shall be compatible in design and appearance with residential structures in the vicinity and shall meet the following standards: <ul style="list-style-type: none"> <li>a. Each manufactured house must be at least sixteen feet (16') wide;</li> <li>b. It must be built on a permanent foundation approved by the Community Development Director;</li> <li>c. It must have been constructed after June 1, 1979, and must be certified under the National Manufactured Home Construction and Safety Act of 1974;</li> <li>d. The unit's skirting must extend to the finished grade;</li> <li>e. Exterior siding must be compatible with adjacent residential structures, and shiny or metallic finishes are prohibited;</li> <li>f. The roof must have a pitch of not fewer than three inches (3") vertical rise per twelve inches (12") horizontal distance;</li> <li>g. The roof must be of concrete or asphalt tile, shakes or shingles complying with the most recent editions of the Uniform Building Code fire rating approved in the City of Manhattan Beach;</li> <li>h. The roof must have eaves or overhangs of not less than one foot (1');</li> <li>i. The floor must be no higher than twenty inches (20") above the exterior finished grade; and</li> <li>j. Required enclosed parking shall be compatible with the manufactured home design and with other buildings in the area.</li> </ul>
Source: City of Manhattan Beach Municipal Code (10.52.100 - Manufactured Homes).	

### 2.1.2.8 Accessory Dwelling Units

Section 65852.2 of the California Government Code requires local governments to permit ADUs subject to certain limitations in single-family and multifamily residential zones. In January 2021, the City adopted the City's current ADU Ordinance to comply with new State regulations. The corresponding amendments to the City's Local Coastal Program (LCP) are currently under review and under consideration by the California Coastal Commission.

Pursuant to MBMC Section 10.74.0.0, a maximum of two total ADUs shall be allowed on a lot with a proposed or existing single-family dwelling within all area districts; however, only one ADU shall be allowed on a property that also has a JADU. Only one detached ADU is allowed on a property. Additionally, in all area districts, one ADU shall be allowed on a lot with a newly constructed multifamily development. More than one ADU, up to 25 percent of the number of pre-existing multifamily dwelling units on the property, shall be allowed where the applicant proposes to demolish an existing multifamily development to build a new multifamily development. For any property that is considered a nonconforming use (i.e., because it does not meet the current site area per dwelling unit requirement), the total resulting number of units on the property, including ADUs, shall not be greater than the number of pre-existing units on the property.

Applicable development standards are in compliance with current State regulations and include, but are not limited to, the following:

- Studio and one bedroom ADUs shall not exceed 850 square feet of gross floor area. ADUs with two or more bedrooms shall not exceed 1,200 square feet of gross floor area.
- A Detached ADU shall not exceed 16 feet in height, or if above a detached garage or below a detached garage that does not qualify as a basement, shall not exceed a total height of 26 feet.
- No setback shall be required for an existing structure converted to an ADU. For all other ADUs, the required setback from side and rear lot lines shall be 4 feet.
- A Detached ADU shall have a minimum 5-foot building separation from other buildings on the lot (note: the standard requirements of 10 feet of separation between structures was reduced to 5 feet for ADUs to incentivize development).
- ADUs do not require parking if the ADU is located within 0.5 miles walking distance of public transit.

The City incentivizes ADUs by permitting ADU development with new residential construction, including multifamily residential projects, which is above and beyond what the State requires of local jurisdictions, as follows:

- Consistent with State law, the City permits one ADU and one JADU. Alternatively, to offer more flexibility, the City permits two ADUs on a lot with a proposed or existing single-family dwelling.<sup>1</sup>
- The City permits ADUs for existing multifamily dwelling units, consistent with State law. In addition, the City permits one ADU on a lot with a newly constructed multifamily development.<sup>2</sup>

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<sup>1</sup> ADUs on Lots with a Single-Family Residence. A maximum of two total ADUs shall be allowed on a lot with a proposed or existing single-family dwelling within all area districts; however, only one ADU shall be allowed on a property that also has a JADU. Only one detached ADU is allowed on a property (MBMC Section 10.74.040).

<sup>2</sup> ADUs on Lots with New MultiFamily Developments. In all area districts, one ADU shall be allowed on a lot with a newly constructed multifamily development (MBMC Section 10.74.040).

### 2.1.3 Development Standards

Each zone that permits residential uses regulates the residential use permitted, lot size, density, and parking requirements. While regulations such as setbacks, lot size, and lot coverage can contribute to the number of dwelling units that can be developed on a lot, residential densities are primarily limited by established maximum densities or minimum lot area per dwelling unit.

**Tables 6a and 6b** provide summaries of ~~each~~ residential zone's RS, RM, and RH development standards by area district, including minimum lot area per dwelling unit, and building height and setback regulations. **Table 6c** provides a description of commercial zones where residential uses are permitted in the City and their respective development standards.

Development standards for the Residential Planned Development (RPD) District and Residential Senior Citizen (RSC) District are provided following Table 6c.

The development standards detailed below do not prevent housing development from achieving the maximum densities allowed in accordance with the MBMC development standards and are not considered a barrier to development. In addition, the City offers flexibility through modifications to development standards, including increased maximum lot coverage, increased building height, and a density bonus above and beyond what is permitted under State law for projects that qualify for a State density bonus, as well as a lot consolidation incentive bonus.

Current residential projects in the pipeline that include lower-income units and are expected to be completed during the planning, will achieve densities at, or above and beyond, the maximums permitted in the underlying zone utilizing density bonus and/or lot consolidation bonus incentives offered by the City. These developments are expected to be completed in the planning period and serve as examples of the ability for developments in the City to achieve the maximum densities under the City's existing development regulations.

See additional discussion in Section 2.6, Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing.

#### *Citywide Election Requirement*

Under MBMC Section 10.12.030 (Property Development Regulations: RS, RM, and RH Districts), certain development standards cannot be amended for the RS, RM, and RH Districts unless the amendment is first submitted to a Citywide election and approved by a majority of the voters. This provision, originally instated as a result of initiative and vote of the people, applies to ~~amendments~~amending the following specific development regulations for the RS, RM, and RH residential zones standards listed in Section 10.12.030 of the MBMC: to increase the standards for the maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit. The city-wide election requirements do not restrict multifamily housing developments or prevent developments from achieving the maximum densities allowed in accordance with the MBMC development standards.

The voter initiative required for amending those specific development regulations in the RS, RM, and RH zones does not preclude the City from implementing incentives, concessions, and waivers under State Density Bonus law. As stated in Section 10.94.010, General Affordable Housing Provisions, of the MBMC and in Government Code Section 65915, the granting of a density bonus, concession or incentive, shall

not require, or be interpreted, in and of itself, to require a general plan amendment, local coastal plan amendment, zoning change, or other discretionary approval. As such, the city-wide election requirements under MBMC Section 10.12.030 are not a constraint to the development of affordable housing and do not restrict the ability of the City to provide flexibility for development under State Density Bonus Law.

<b>Table 6a. Residential Development Standards by Zone for Area District I and II</b>						
<b>Development Regulation</b>	<b>Area District I</b>			<b>Area District II</b>		
	<b>RS</b>	<b>RM</b>	<b>RH</b>	<b>RS</b>	<b>RM</b>	<b>RH</b>
Minimum Lot Area	7,500 sq ft	7,500 sq ft	7,500 sq ft	4,600 sq ft	4,600 sq ft	4,600 sq ft
Maximum Lot Area	15,000 sq ft	15,000 sq ft	15,000 sq ft	10,800 sq ft	10,800 sq ft	10,800 sq ft
Minimum Width	50 ft	50 ft	50 ft	40 ft	40 ft	40 ft
Front Setback	20 ft	20 ft	20 ft	20 ft	20 ft	20 ft
Side Setback	10% 3 ft min	10% 3 ft min; 10 ft max	10% 3 ft min; 10 ft max	10% 3 ft min	10% 3 ft min; 10 ft max	10% 3 ft min; 10 ft max
Corner Side Setback	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max	10% 3 ft min; 5 ft max
Rear Setback	12 ft min.	12 ft min.	12 ft min.	12 ft min.	12 ft min.	1 2ft min.
Maximum Height of Structures	26 ft	26 ft	30 ft	26 ft	26 ft	30 ft
Minimum Lot Area per Dwelling Unit	7,500 sq ft	3,750 sq ft	1,000 sq ft	4,600 sq ft	2,300 sq ft	1,000 sq ft
Open Space per Dwelling Unit	For multifamily dwelling units in all districts, the minimum usable open space* (private and shared) requirement is 15% of the buildable floor area per unit, but not less 220 square feet.					
<p>Source: Chapter 10, Planning and Zoning of the MBMC, 2021.            RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; sq ft = square feet; ft = feet; min = minimum; max = maximum</p> <p>* Outdoor or unenclosed area on the ground, or on a balcony, deck, porch, or terrace designed and accessible for outdoor living, recreation, pedestrian access or landscaping, that is not more than 75% covered by buildable floor area, and has a minimum dimension of 5 feet in any direction, and a minimum area of 48 square feet.</p>						



<b>Table 6b. Residential Development Standards by Zone for Area District III and IV</b>						
<b>Development Regulation</b>	<b>Area District III</b>			<b>Area District IV</b>		
	<b>RS</b>	<b>RM</b>	<b>RH</b>	<b>RS</b>	<b>RM</b>	<b>RH</b>
Min Lot Area	2,700 sq ft	2,700 sq ft	2,700 sq ft	N/A	N/A	2,700 sq ft
Max Lot Area	7,000 sq ft	7,000 sq ft	7,000 sq ft	—	—	7,000 sq ft
Min Width	30 ft	30 ft	30 ft	—	—	30 ft
Front Setback	5 ft	5 ft	5 ft	—	—	5 ft
Side Setback	10% 3ft min.	10% 3 ft min; 10 ft max	10% 3 ft min; 10 ft max	—	—	10% 3 ft min; 10 ft max
Corner Side Setback	1 ft	1 ft	1 ft	—	—	1 ft
Rear Setback	5 ft min, 10 ft max	5 ft	5 ft	—	—	5 ft
Maximum Height of Structures	30 ft	30 ft	30 ft	—	—	30 ft
Minimum Lot Area per Dwelling Unit	1,700 sq ft	1,350 sq ft	850 sq ft	—	—	850 sq ft
Open Space per Dwelling Unit	For single-family dwellings in Area District III and IV and multifamily dwelling units in all districts, the minimum usable open space* (private and shared) is 15% of the buildable floor area per unit, but not less than 220 square feet.					
Source: Chapter 10, Planning and Zoning of the MBMC, 2021.						
RS = Single-Family Residential; RM = Medium-Density Residential; RH = High-Density Residential; sq ft = square feet; ft = feet; min = minimum; max = maximum; N/A = not applicable						
* See Table 6a, Residential Development Standards by Zone for Area District I and II.						

<b>Table 6c. Residential Development Standards in Commercial Zones (CL, CD, CNE)</b>		
<b>Zoning District</b>	<b>Residential as Sole Use</b>	<b>Mixed Use</b>
CL	Dwelling units as the sole use on a site shall be subject to the standards for residential development in the RH district and the area district in which the site is located. For CL, an exception for height requirements dictates the commercial standard for building height shall apply when dwelling units replace commercial use.	In a mixed use development, the residential standards for the RH district and area district in which the site is located shall apply to a building or portion of a building intended for residential use, and commercial standards shall apply to a building or portion of building intended for commercial use. For CL, an exception dictates the commercial standard for maximum FAR [floor area ratio] shall apply to the entire project.
CD	Dwelling units as the sole use on a site shall be subject to the standards for residential development in the RH district and the area district in which the site is located.	In a mixed use development, the residential standards for the RH district and area district in which the site is located shall apply to a building or portion of a building intended for residential use, and commercial standards shall apply to a building or portion of building intended for commercial use. For CD, an exception regarding building height requires the commercial standard shall apply to all portion(s) of the project except when an existing residential use that is legally established as of February 22, 1996 and occupies a solely residential building, is altered or replaced with a solely residential building, in which case the RH district standard shall apply. Additionally, an exception dictates the commercial standard for maximum FAR shall apply to the entire project.
CNE	Dwelling units as the sole use on a site shall be subject to the standards for residential development in the RH district and the area district in which the site is located. For CNE, D-5 overlay, an exception dictates if an RH district standard conflicts with an overlay standard (Section 10.44.040), the overlay standard shall apply.	In a mixed use development, the residential standards for the RH district and area district in which the site is located shall apply to a building or portion of a building intended for residential use, and commercial standards shall apply to a building or portion of building intended for commercial use. For CNE, D-5 overlay, an exception dictates if an RH district standard conflicts with an overlay standard (Section 10.44.040), the overlay standard shall apply. Additionally, an exception dictates the commercial standard for maximum FAR shall apply to the entire project.
Source: Chapter 10, Planning and Zoning of the MBMC, 2021.		

**Residential Planned Development (RPD) District Development Standards**

The RPD is intended to facilitate adequate, economical and efficient provision of community facilities, streets, utilities, and parks in a landscaped setting. It should be noted that the RPD zone, encompasses approximately 77 acres, but is a completely built-out, gated planned community built in the 1990’s. The community consists of approximately 400 town and court homes and 122 estate single-family homes.

The following development regulations apply in the RPD zone:

**A. General Conditions and Limitations. Each comprehensive residential planned development (RPD) shall be subject to use permit approval, and the following conditions and limitations (see also Section 10.12.020 for additional land use regulations).**

1. The maximum permitted density shall be consistent with the General Plan.

2. Greenbelts shall be provided offering easy access between dwelling units, parks, and commercial areas.
3. Each building site shall abut and provide access to a public or private street or alley.
4. The RPD shall be designed around an architectural theme or themes providing architectural variations and containing landscaped berms and/or decorative walls and fences. Homeowners associations, to be established at the time of initial development, shall have the authority to determine theme consistency for subsequent ministerial projects.

**B. Development Standards.** This subsection establishes minimum development standards that are intended to apply to all physical improvements on the site and ensure construction of a high-quality residential environment in a RPD district. Minor modifications to these standards, with the exception of development density, may be approved by the Planning Commission as part of an RPD permit and shall be incorporated into the Planning Commission resolution approving the RPD permit. Minor modifications to standards may be approved by the Community Development Director for subsequent isolated projects (including reconstruction) that are compatible with the existing RPD development (existing prior to January 1995) if such modifications are requested in writing by the applicant and responsible homeowners' association.

1. **Minimum Building Site Area.** Forty thousand (40,000) square feet.
2. **Minimum Lot Area.**
  - a. **Detached Single-Family Dwellings.** Five thousand (5,000) net square feet per unit, provided the average lot area shall not be less than five thousand five hundred (5,500) square feet for the total net site area.
  - b. **Attached or Cluster Multiple-Family Dwellings.** A minimum lot area of two thousand (2,000) net square feet per unit shall be required, provided the average lot area per dwelling unit shall not be less than two thousand five hundred (2,500) square feet for the total net site area.
  - c. **Determining Net Site Area.** Net site area excludes common areas that are required for parkland or right of way dedication requirements and areas that exceed a fifteen percent (15%) slope.
3. **Maximum Building Height.** Twenty-six feet (26'). A height limitation of thirty feet (30') for multifamily developments may be approved if the additional height is required to construct a tuck-under garage which provides direct access to a dwelling unit. Height shall be measured in accord with Section 10.60.050.
4. **Maximum Building Site (Lot) Coverage.**
  - a. **Single-Family Dwellings.** Fifty percent (50%), exclusive of roof overhangs, trellis areas, covered porches, and allowable structures in the side and rear yard setback areas.
  - b. **Multiple-Family Dwellings.** Sixty percent (60%), excluding roof overhangs, trellis areas, and covered porches.
5. **Minimum Building Setbacks for Single-Family Dwellings and Accessory Structures.**
  - a. **From Street Property Lines.**

<u>Street Designation</u>	<u>Minimum Setback</u>
	<u>(Feet)</u>
<u>Arterial</u>	<u>50</u>
<u>Collector (primary loop)</u>	<u>30</u>

<u>Collector (secondary loops)</u>	<u>25</u>
<u>Neighborhood or local</u>	<u>20</u>
<u>Private driveways or alleys</u>	<u>20</u>

**b. From Interior Side-Lot Line.** Five feet (5').

- 1. Exceptions for Zero-Side Yards.** A zero (0) side-yard development may be approved if the opposite yard or the combined side-yard setbacks of the two (2) adjoining structures is a minimum of ten feet (10').

**c. From Rear Lot Line:** twenty feet (20').

- 1. Exception.** If the area to be developed contains more than thirty (30) acres, a maximum of twenty-five percent (25%) of the total number of lots may have reduced rear-yard setbacks, provided that the average setback shall not be less than fifteen feet (15') on any lot, but in no case shall the dimension between the closest point of the structure and the property line be less than ten feet (10'). In addition, up to three percent (3%) of the total number of lots can maintain a minimum eight-foot (8') setback.

**d. Structures Allowed in the Setback Area.** Limited structural improvements are permitted to be located in side- and rear-yard setback areas to provide the occupant with usable space for open space and recreational purposes. These uses may include pools and spas, pool and spa equipment, barbecues, garden potting benches and related storage, fountains, bird baths, patio covers, second-story open and unenclosed balconies, gazebos, greenhouses, planter beds, landscaping, irrigation systems, and other similar improvements which, in the determination of the Director of Community Development, meet the intent of this section. The installation of such improvements is subject to the following conditions.

1. No improvement may be constructed in violation of the Uniform Building Codes or other applicable codes and ordinances.
2. The rear-yard setback area must be provided with continuous access, defined as an area open and unobstructed from the ground to the sky, a minimum of three feet (3') wide, from the front to the rear of the property.
3. No improvement other than area-separation walls or fences which cannot exceed the height limits prescribed by this Code, may be constructed in excess of fifteen feet (15') in height.
4. Any improvement(s) that has a roof element shall not exceed a maximum lot coverage of 40 percent of the required rear-yard setback.

**e. Setbacks from Public Greenbelts, Lakes, or Parks.** 20 feet plus 10 feet for two-level dwellings.

**f. Setbacks from District Boundaries.** 50 feet. The Planning Commission may reduce this requirement upon finding that an adequate buffer is provided.

**g. Building Separation.** The distance between primary buildings and accessory buildings on the same lot shall not be less than 10 feet.

**6. Minimum Building Setbacks for Attached or Cluster Multifamily Dwellings:**

**a. From Street Property Lines:**

<u>Street Designation</u>	<u>Minimum Setback (Feet)</u>
<u>Arterial</u>	<u>50</u>
<u>Collector (primary loop)</u>	<u>30</u>

<u>Collector (secondary loops)</u>	<u>25</u>
<u>Neighborhood or local</u>	<u>20</u>
<u>Private driveways or alleys</u>	<u>20</u>

**b. Setbacks between Structures on the Same Site:**

Individual Primary Buildings: 10 feet.

Building Clusters: 40 feet plus 5 feet for each story above one.

**1. Exception:** Where the open space is more than 10 feet below the elevation of the residential structures, the first-story setback can be no less than 10 feet.

**c. Setbacks between Clusters and Public Greenbelts, Lakes, and Parks:** 20 feet plus 5 feet for each story above one.

**d. Setbacks from District Boundaries:** 50 feet. The Planning Commission may reduce this requirement upon finding that an adequate buffer is provided.

**e.** If the area to be developed contains more than 40 acres, the setback requirements can be modified by an RPD Permit if the Planning Commission finds that the project is in substantial compliance with the intent and purpose of the RPD District.

**7. Private Open Space.** The minimum usable open space shall be three hundred (300) square feet, shall be on the ground, and shall be intended to provide for private recreational outdoor use.

**8. Public Open Space.**

**a.** All public common areas, parks, recreation facilities and medians shall be fully developed and landscaped in accord with plans approved by the Public Works Department.

**b.** The homeowners' association(s) shall be responsible for the maintenance of all private common areas including, but not limited to, parkways and trails, recreation facilities, and landscaped medians.

**9. Parking Requirements.**

**a.** Single-Family Dwellings. Two (2) enclosed off-street parking spaces directly serving each unit, plus two (2) additional off-street parking spaces, either enclosed or unenclosed.

**b.** Multiple-Family Dwellings. Two (2) enclosed off-street parking spaces directly serving each unit, plus one (1) additional off-street parking space for use by guests. Guest parking may be located adjacent to the dwelling unit served or may be clustered if the Planning Commission finds that such clusters will be located in convenient proximity to a number of dwelling units.

**c.** Recreational Vehicles: A deed restriction shall be imposed on all residential properties prohibiting the parking of recreational vehicles, trailers, or boats on private driveways or streets within the development.

The designation of or regulations of the RPD zone in no way constrains development, as this zone applies to limited areas of the City that are entirely built out. Any amendments to the regulations of the RPD zone would not serve any planned or future development, as it would not result in a removal of any potential constraints. Further, no sites identified in the Sites Inventory are on sites zoned RPD.

## **Residential Senior Citizen (RSC) District Development Standards**

The RSC was codified with the intent of facilitating the development of quality senior housing on a specific site through specific standards that recognize the specific requirements of senior-citizen housing. Per the MBMC, a senior citizen household shall be defined as a household in which one member of the household, or dwelling unit, is sixty-two (62) years of age or older. It should be noted that this zone includes three parcels and encompasses a total of approximately 4.7 acres in the City. The parcels are built-out with existing housing for older adults including the Ross Manhattan Terrace apartments for older adults built in 1991, and the Manhattan Senior Villas, built in 1997, an affordable, independent living housing apartment complex for older adults and older adults with disabilities. The implementation of the RSC zone has been fully realized and does not apply to any other sites in the City, and therefore does not apply to any planned or future development.

However, Additionally, the RSC zone does not preclude or constrain the development of additional housing for older adults in the City since senior housing (independent living) is qualified as a multifamily residential use and can be constructed in all zones that allow for multifamily residential development via the same processes as described in Section 2.1.2.6, Multifamily Dwelling Units. Accordingly, senior housing is allowed in the following zoning districts: RM, RH, RSC, RPD, CL, CD, and CNE, as further discussed in **Section 2.2.1, Senior Housing/ Housing for Older Adults.**

The following development regulations apply to the RSC zone:

- A. **Minimum Building Site Area.** Forty thousand (40,000) square feet.
- B. **Minimum Lot Area per Dwelling Unit.** Nine hundred (900) square feet.
- C. **Minimum Floor Area per Dwelling Unit.** Five hundred twenty-five (525) square feet.
- D. **Maximum Building Height.** Thirty feet (30'). The Planning Commission shall review the compatibility of the height of the proposed development with the surrounding neighborhood in accord with the following criteria:
  - 1. Building height shall be compatible with existing adjacent structures. Tuck-under parking and/or a sloped roof design with a minimum ratio of 4:12 is suggested for structures exceeding twenty-six feet (26') in height.
  - 2. All rooftop or elevated mechanical equipment or vents shall be screened from view.
- E. **Maximum Floor Area Ratio.** 1.5:1.
- F. **Minimum Yards and Building Setbacks.** Minimum yards and setbacks shall not be less than those required in the RH district for the area district in which the development is proposed.
- G. **Minimum Distance between Buildings.** Ten feet (10').
- H. **Building Design.** To encourage greater architectural creativity in facade design, two (2) of the following architectural elements are required as part of each building facade: sloped roofs; bay windows; awnings; roof eaves; cornices; sills; buttresses; balconies; or patios.
- I. **Open Space.**
  - 1. **Overall Requirement.** Total three hundred fifty (350) square feet of usable open space shall be provided for each unit.
  - 2. **Private Open Space.** A minimum of fifty (50) square feet with direct access from each unit shall be provided. The minimum horizontal dimension of balconies shall be five feet (5').
  - 3. **Common Open Space.** The minimum horizontal dimension of patios, decks, courtyard areas, and other common space shall be ten feet (10').

J. **Community Facilities.** An amount equal to fifteen (15) square feet per unit shall be developed as community space providing handicapped bathrooms and kitchen facilities to be used by project residents and their guests only.

K. **Landscaping.**

1. All unpaved areas shall be planted with an effective combination of trees, ground cover, and shrubbery.
2. Landscaping may be required in excess of the minimum standards specified for a proposed development, provided that the additional landscaping is necessary to accomplish the following:
  - a. Screen adjacent uses from parking areas, storage, or structures that could cause a negative impact on adjacent uses based on aesthetics, noise, or odors; or
  - b. Provide landscaping that is compatible with neighboring uses.
3. The landscape plan shall be compatible with the shape and topography of the site and the architectural characteristics of the structures on the site.
4. The plant materials selected shall be suitable for the given soil and climate conditions.
5. Landscaping shall be used to relieve solid, unbroken elevations and to soften continuous wall expanses.
6. Landscaping shall be maintained in an orderly and healthy condition. This maintenance shall include proper pruning, mowing of lawns, weeding, removal of litter, fertilizing, replacement of plants when necessary, and regular watering.
7. Landscaping shall screen storage areas, trash enclosures, parking areas, public utilities, and other similar land uses or elements that do not contribute to the enhancement of the surrounding areas.
8. All landscaping shall be separated from parking and vehicular circulation areas by a raised, continuous six-inch (6") curb. Other materials that accomplish the same purpose may be approved by the Director of Community Development.
9. For additional site landscaping requirements, see Section 10.60.070, Landscaping, Irrigation and Hydroseeding. Conformance with standards specified in Section 10.60.070 may result in landscaping that exceeds the minimum requirements of this section.

L. **Parking Requirements:**

1. **Minimum Spaces:**
  - a. 1.2 per unit, including one enclosed; and
  - b. One (1) space for every nonresidential employee.
2. **Loading Area:** A loading area shall be provided on site. The area may not at any time obstruct vehicular or pedestrian circulation, or block access to parking. The loading area shall be:
  - a. An off-street loading space of not less than ten feet (10') × twenty feet (20'); or
  - b. A loading zone of not less than twenty-five (25) lineal feet.
3. **Aesthetics:**
  - a. No more than forty percent (40%) of the street frontage shall be utilized for vehicular access.
  - b. To avoid long, continuous blank walls at-grade, parking garages shall include openings such as windows and doors for fifty percent (50%) of the vertical surface.
  - c. Exterior lighting shall be designed in such a manner as to avoid glare on adjacent properties.
4. **Parking Access and Driveways:**

- a. In pedestrian-intensive areas, such as but not limited to the Downtown, the North End (El Porto), and the local-servicing commercial properties along Highland and Rosecrans avenues, driveway encroachments are discouraged along the primary commercial streets (Manhattan Avenue, Manhattan Beach Boulevard, Highland Avenue, Morningside Drive, and Rosecrans Avenue). Driveways shall be limited, where feasible, to side streets and/or alleys.
- b. Each driveway serving the garages or parking spaces shall be at least ten feet (10') wide for one (1) way or twenty-five feet (25') for two (2) way.

**M. Unit Design Standards.**

1. To assist in reaching, drawers and shelves shall be on gliders or rotating.
2. For easy grip, lever handles shall be used instead of knobs.
3. Tub/showers shall have non-slip surfaces with grab bars.
4. For security/convenience:
  - a. A peep-hole shall be included in the front door;
  - b. Dead-bolt exterior doors shall be installed;
  - c. Whenever possible, unit entrances shall have direct access to parking facilities; and
  - d. Long interior halls shall be avoided.
5. A minimum of two hundred (200) cubic feet of storage space per unit shall be provided.
6. All projects two (2) stories in height or greater shall have elevators.
7. Unit orientation and window location:
  - a. The living room or living space with the greatest square footage, other than a bedroom, shall have an operable window facing the front or rear yard.
  - b. For easy visibility from a sitting position within the unit, at least one (1) window in the living room shall have a sill no greater than thirty inches (30") from the floor.

The designation of or regulations of the RSC zone in no way constrains development, as this zone applies to limited areas of the City that are entirely built out. Any amendments to the regulations of the RSC zone would not serve any planned or future development, as it would not result in a removal of any potential constraints. Further, no sites identified in the Sites Inventory are on sites zoned RSC.

**2.1.3.1 Parking Requirements**

The provision of parking is needed to satisfy the requirements of the Zoning Code. In addition, the California Coastal Commission has repeatedly expressed the need to preserve public parking for visitor serving uses, which can sometimes be affected by new development. A reduction in parking to fewer than two parking spaces per dwelling unit could potentially result in impacts on existing public parking. City parking requirements are shown in **Table 7, Parking Requirements for Residential Land Uses**. As can be seen from this table, parking requirements are most stringent for larger units and least stringent for smaller, more affordable units, including a reduction from two spaces to one space for units with less than 550 square feet of floor space in multifamily residential buildings with less than four units and a minimal requirement of 0.25 guest spaces per unit in multifamily residential buildings for buildings with 4 or more units.

To mitigate potential constraints to the development of housing affordable to lower- or moderate-income households, lower-income students, senior citizens housing development, as defined in Sections 51.3 and 51.12 of the Civil Code, or those with special needs, such as transitional foster youth, veterans with a disability, or people experiencing homelessness, the City provides reduced parking requirements



for housing developments that qualify for a density bonus pursuant to State density bonus law. Consistent with AB 2345 (2020), the City does not require a parking ratio that exceeds the following for a development that receives a density bonus:

- Studio / 1-bedroom Units – 1 space
- 2 Bedroom / 3 Bedroom Units – 1.5 spaces
- 4 or More Bedroom Units – 2.5 spaces

While the City implements these parking ratios in accordance with current State density bonus law, as part of **Program 11** of the Housing Element, the City commits to amending Section 10.94.040 - Affordable Housing Concessions and Incentives, of the MBMC to ensure the reduced parking ratios in the Zoning Code are consistent with AB 2345 (2020), so that the reduced parking ratios available are clear to any applicant who qualifies for a density bonus.

In addition to the reduced parking ratios currently offered, the City will conduct a parking study as part of **Program 22**, Parking Reductions, of the Housing Element to identify opportunities for additional parking reductions for residential multifamily housing outside of the Coastal Zone, such as reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities. S

See additional discussion in Section 2.6, Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing.

<b>Table 7. Parking Requirements for Residential Land Uses</b>	
<b>Unit Type</b>	<b>Required Parking</b>
Single-Family Residential: Dwelling with Buildable Floor Area (BFA), plus any exempted basement floor area, totaling less than 3,600 square feet	2 enclosed spaces per unit.
Single-Family Residential: Dwelling with Buildable Floor Area (BFA), plus any exempted basement floor area, totaling 3,600 square feet or more	3 enclosed spaces per unit.
Multifamily Residential (Condominiums)	2 enclosed spaces per condominium unit. In buildings with fewer than 4 units, only 1 enclosed space is required for units with less than 550 square feet of floor area. Required Guest Parking: 1 guest space is required per unit; these may be in tandem configuration provided that, except for lots on The Strand, none other than resident spaces of the same unit are blocked and that such a configuration would not result in undue traffic hazard. Guest parking may be "Compact."

Table 7. Parking Requirements for Residential Land Uses	
Unit Type	Required Parking
Multifamily Residential (Apartments)	2 spaces are required per unit, including 1 enclosed per unit. In Area District IV, both spaces must be enclosed. In building with fewer than 4 units, only 1 enclosed space is required for units with less than 550 square feet of floor area. Required Guest Parking: 0.25 space per unit for buildings with 4 or more units. Guest parking may be "Compact."
Residential Care, Limited	1 space per 3 beds.
Senior Citizen	0.5 space per unit, plus 1 accessible and designated guest space/ 5 units. 1 space per non-resident employee and 1 loading area.
Source: City of Manhattan Beach Municipal Code (10.64.030)	

2.1.4 Coastal Zone

Section 65590 of the California State Government Code requires the inclusion of low- or moderate-income housing in new residential development in the Coastal Zone where feasible. [Most of the housing in the Coastal Zone consists of high-cost market-rate units due to coastal desirability. Development in the Coastal Zone is constrained by high land values. ~~Due to land costs~~The limited availability and high cost of land, it would not be make feasible it infeasible](#) to provide low- or moderate-income housing on single-family or small multifamily lots within the City’s Coastal Zone without very large subsidies. [Those areas of the City that are subject to the Coastal Zone run along the coast where the northern and southern boundaries of the Coastal Zone are the same as the City’s boundaries; the western border of the Coastal Zone is the Pacific Ocean; and the eastern portions run along Vista Drive Between 35<sup>th</sup> Street and 24<sup>th</sup> Street, along Grandview Avenue between 24<sup>th</sup> Street and 21<sup>st</sup> street, along Valley Drive between 20<sup>th</sup> Street and 10<sup>th</sup> Street, and along Bayview Drive from 10<sup>th</sup> street to the City’s southern boundary. The built environment of the Coastal Zone in Manhattan Beach is similar to many beach communities across California, with a mixture of lower density housing types built with minimal setbacks, a grid street network that creates view corridors that lead to the coast, and strong pedestrian connectivity provided by adequate sidewalks, painted pedestrian crosswalks, and pedestrian cut-throughs.](#) There are no large vacant lots available for housing complexes that would accommodate large numbers of dwelling units within the Coastal Zone. However, significant development opportunities exist within the Coastal Zone on underutilized commercial properties in the CD, CNE, and CL zones.

[The City’s Coastal Zone implements the California Coastal Act within the City. Sites within the City’s Coastal Zone are required to obtain a discretionary permit to verify consistency of the proposed development with the California Coastal Act. Specifically, development as defined by the California Coastal Act Section 30102, within the Coastal Overlay Zone requires a Coastal Development Permit. Discretionary actions associated with a Coastal Development Permit can be a constraint to development within the Coastal Zone, as they can add time to the permit process, can increase the cost associated with development, and can increase development uncertainty. However, the City has a certified Local Coastal program which allows the City to issue coastal permits, which minimizes this constraint to the extent possible. Additionally, only one site in the Sites Inventory has been identified within the Coastal](#)

[Zone to accommodate lower income housing capacity and no sites identified to be rezoned to accommodate lower-income housing capacity fall within the Coastal Zone, further minimizing this constraint as it relates to meeting the City’s housing needs for lower-income housing.](#)

The City has a certified LCP. The LCP was certified by the California Coastal Commission in 1994, and therefore the City is able to issue its own coastal permits. The LCP addresses three primary issue areas: public access, locating and planning for new development, and preservation of marine-related resources. The LCP includes a number of policies that affect the ability to develop new housing within the coastal areas of the City. These include policies related to the preservation of beach access, the provision of adequate parking (including requiring adequate off-street parking to be provided in new residential development), and controlling the types and densities of residential development within the Coastal Zone. [Strategies of the Housing Element that intersect with coastal preservation policies most closely align with those policies detailed under Goal 1, which aims to preserve and enhance the existing housing stock. Housing Element Policy 1.1 states that the City will “Preserve the scale of development in existing residential neighborhoods.” And Policy 1.3 states that the City will “Conserve existing dwelling units.”](#) -Coastal policies related to residential development within the Coastal Zone include the following:

1. Policy II.B.1: Maintain building scale in Coastal Zone residential neighborhoods consistent with Chapter 2 of the Implementation Plan.
2. Policy II.B.2: Maintain residential building bulk control established by development standards in Chapter 2 of the Implementation Plan.
3. Policy II.B.3: Maintain Coastal Zone residential height limit not to exceed 30 feet as required by Sections A.04.030 and A.60.050 of Chapter 2 of the Implementation Plan.
4. Policy II.B.4: The beach shall be preserved for public beach recreation. No permanent structures, with the exception of bikeways, walkways, and restrooms, shall be permitted on the beach.

At the same time, the City seeks to process permits in the Coastal Zone as efficiently as possible. As noted above, certification of the City’s LCP allows the City to process coastal permits locally, saving the time and expense of a separate Coastal Commission approval. [Coastal Commission approval can take upwards of 18 to 24 months, whereas City approval of a Coastal Development Permit can take between 2 to 5 months. The City’s Local Coastal Program saves time and money for applicants since they do not need to seek separate approval from the California Coastal Commission.](#)

[All decisions on Coastal Development Permits shall be accompanied by written findings:](#)

1. [That the project, as described in the application and accompanying materials, as modified by any conditions of approval, conforms with the certified Manhattan Beach Local Coastal Program; and](#)
2. [If the project is located between the first public road and the sea, that the project is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 \(Commencing with Section 30200 of the Public Resources Code\).](#)

[While the need for discretionary approval for development within the Coastal Zone is a constraint to development, the reduction of permit processing time associated with City approval afforded by the certified Local Coastal Program significantly reduces this constraint, increasing the feasibility of](#)

[development within the Coastal Zone. Further detail on permit timeframes and processes can be found in Section 2.4.](#)

### 2.1.5 Condominium Conversions

MBMC Section 10.88.070 and LCP Section A.88.070 govern conversion of residential structures from rental units to condominiums (or any other form of multiple ownership interests), recognizing that conversions may significantly affect the balance between rental and ownership housing within the City, and thereby reduce the variety of individual choices of tenure, type, price, and location of housing; increase overall rents; decrease the supply of rental housing for all income groups; displace individuals and families; and disregard the needs of the prevailing consumer market. The purpose of these regulations is to provide guidelines to evaluate those problems, including the impact any conversion application may have on the community, and to establish requirements that shall be included in any conversion approval.

Requirements applicable to condominium conversions include, but are not limited to, tenant notification, notification of a right to purchase, tenant purchase discounts, and relocation expenses. Special provision is also made for lifetime leases for non-purchasing older adults or tenants with medical disabilities. In addition, low- and moderate-income tenants and those with children are provided an extended relocation period. In evaluating requests for condominium conversion, the Planning Commission must consider the impact of tenant displacement, with emphasis on existing low- and moderate-income tenants (see **Program 262, Replacement Requirements**, of the Housing Element for replacement requirements in accordance with SB 330 (2019)).

### 2.1.6 Short-Term Rentals

Short-term rentals and other transient uses in residential zones can have a severe negative impact on the character and stability of the residential zones and its residents. Transient uses, including short-term rentals (less than 30 days), in residential zones are not allowed under MBMC Chapter 4.88, and are incompatible with the goals and objectives of the City's General Plan. The General Plan aims to preserve and maintain residential neighborhoods, and to protect residential neighborhoods from the intrusion of incompatible and character-changing uses.

## 2.2 Provisions for Special Housing Types

Per Government Code Section 65583(a), persons with special needs include those in residential care facilities; persons with disabilities; and persons needing emergency shelter, transitional or supportive housing, and low-cost single-room-occupancy units. The City's regulations regarding these housing types are discussed below.

### 2.2.1 Senior Housing/Housing for Older Adults

A senior housing development is defined by Section 51.3 of the California Civil Code as a residential development substantially rehabilitated or substantially renovated for senior citizens, commonly referred to as older adults. The units are restricted for use by qualifying residents. While the MBMC does not identify senior housing (independent living) as a stand-alone use classification, it qualifies as a multifamily residential use and can be constructed in all zones that allow for multifamily residential development via the same processes as described in Section 2.1.2.6, Multifamily Dwelling Units.

Accordingly, senior housing is allowed in the following zoning districts: RM, RH, RSC, RPD, CL, CD, and CNE.

The City provides various incentives and streamlined approval to developers in exchange for senior housing, consistent with those incentives defined by the State density bonus law. In addition, the MBMC provides a less-stringent parking requirement for senior housing, as detailed below and in Table 7:

- 0.5 spaces per unit plus one accessible and designated guest space per every five units
- 1 space per non-resident employee and 1 loading area (11 feet wide × 30 feet long × 10 feet high).

### 2.2.2 Boarding Homes/Group Residential

Group residential it is not considered a residential care facility and is defined in MBMC Section 10.08.030.C as “shared living quarters with not more than five guest rooms and without separate kitchen or bathroom facilities for each guest room, and where either of the following apply:

1. Lodging and meals for compensation are provided by pre-arrangement for definite periods for not more than nine persons, or
2. Rooms, beds or spaces within the living quarters are rented to 10 or more individuals by pre-arrangement for definite periods. Shared living quarters with six or more guest rooms or where lodging and meals for compensation are provided for 10 or more persons shall be considered a Visitor Accommodation.”

Group residential facilities require 1 parking space per every 2 beds, plus 1 parking space per 100 square feet used for assembly purposes in accordance with the MBMC.

Group residential facilities are a conditionally permitted use in the High-Density Residential (RH) and Residential Senior Citizen (RSC) zones. Use permits are reviewed and approved by the Planning Commission at a public hearing; see Section 2.4.3, Conditional Use Permit (Use Permit), for details.

### 2.2.3 Community Care Facilities

Community care facilities are defined by Section 1502 of the Health and Safety Code as any facility, place, or building that is maintained and operated to provide nonmedical residential care, day treatment, adult daycare, or foster family agency services for children, adults, or children and adults, including, but not limited to, the physically handicapped, mentally impaired, incompetent persons, and abused or neglected children, and includes residential facilities, adult day programs, therapeutic day services facilities, foster family agencies, foster family homes, small family homes, social rehabilitation facilities, and community treatment facilities.

#### 2.2.3.1 Residential Care Facilities

Health and Safety Code Sections 1267.8, 1566.3, 1568.08 require local governments to treat licensed group homes and residential care facilities with six or fewer residents no differently than other single-family residential uses. “Six or fewer persons” does not include the operator, the operator’s family, or persons employed as staff. Local agencies must allow these licensed care facilities in any area zoned for residential use, and may not require licensed residential care facilities for six or fewer persons to obtain conditional Use Permits ([Use Permits](#)) or variances that are not required of other family dwellings. Large

residential care facilities (those with seven or more residents) are subject to local land use regulations and other restrictions, such as Conditional Use Permit ([Use Permit](#)) requirements.

*Residential Care, Limited* is defined in MBMC Section 10.08.030.E as “Twenty-four (24) hour non-medical care for six (6) or fewer persons in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California.” These facilities are a permitted use in all residential zones (RS, RM, RH, RPD, and RSC) in conformance with State law.

*Residential Care, General* is defined in MBMC Section 10.08.040.N as “Twenty-four (24) hour non-medical care for seven (7) or more persons, including wards of the juvenile court, in need of personal services, supervision, protection, or assistance essential for sustaining the activities of daily living. This classification includes only those services and facilities licensed by the State of California.” These facilities are conditionally permitted uses [requiring a Use Permit](#) in the RH, RPD, RSC, CG (General Commercial), and PS (Public and Semi-Public) zones subject to approval of a Use Permit by the Planning Commission; see Section 2.4.3, Conditional Use Permit (Use Permit), for details. These regulations do not pose an unreasonable constraint as they are conditionally permitted in several zones, providing a variety of areas in the City where they could potentially be developed, and the Use Permits are allowed in accordance with State law.

[State law requires that a residential care facility have a valid license to operate \(Section 1568.5 of the Health and Safety Code\). Over concentration of certain care homes in a neighborhood is also regulated by the state for licensed facilities. Regulations associated with state licensing increase the complexity associated with large residential care facilities. For example, licenses issued by the Department of Social Services \(except for foster homes and elderly care\) must be a minimum of 300 feet away from any other licensed home \(as measured from the outside walls of the house - Section 1520.5 of the CA Health and Safety Code\). The increased complexity associated with large residential care facilities can cause conflict between zoning code regulations and state requirements when these uses are permitted without discretion. While discretionary permits can constrain development through increased timing associated with permitting, the Use Permit associated with large residential care facilities is necessary for such project complexity.](#)

[Further, the Planning Commission will only deny a use permit if the permit findings cannot be met. Most recently, the Manhattan Beach Planning Commission approved the Sunrise Assisted Living Facility, a Large Residential Care Facility in July 2021. This new Large Residential Care Facility will provide a new 80,000 square foot assisted living facility serving older adults within the D9-Sepulveda Corridor overlay in the CG zone. The facility will consist of 95 rooms \(115 total beds\), including 64 assisted living rooms and 31 memory care rooms for Alzheimer’s patients and individuals with memory loss. This key example shows that while the discretionary permit may be perceived as a constraint to development, this use is not excluded, and development of Residential Care facilities serving seven or more persons is occurring in the City under the requirements and regulations \(Permit findings associated with Use Permits are further detailed in Section 2.4.3\). Nonetheless, the City will mitigate any potential constraints that may be posed by a Use Permit for Residential Care Facilities by making the approval process more predictable and transparent. Currently, Residential Care, General facilities are subject to the broader findings for all Use Permits outlined in Section 10.84.060 - Required Findings, of the MBMC. Through Program 28 of the Housing Element, the City will amend the Zoning Code to include findings specific to Use Permits for Residential Care, General \(serving seven or more persons\) facilities. The City will ensure](#)

the findings are objective and improve certainty in the development approval process to better facilitate the production of Residential Care Facilities to serve the needs of the community.

There are no concentration or separation requirements for residential care facilities or group homes in the MBMC. Furthermore, there are no special site planning requirements (other than parking, height, and setbacks) for residential care facilities in the Planning and Zoning Code.

Code requirements for off-street parking are as follows:

- Residential Care, Limited: 1 space per 3 beds.
- Residential Care, General: 1 space per 3 beds, plus additional spaces, as specified by Use Permit.

#### 2.2.4 Definition of Family

Fair housing law prohibits defining family (and by extension living quarters) in terms of the relationship of members (e.g., marital status), number of occupants (e.g., family size), or any other characteristics. Other definitions should also be consistent with fair housing law. The City defines family as “a single individual or two (2) or more persons living together as a single housekeeping unit in a dwelling unit, provided that this shall not exclude the renting of rooms in a dwelling unit as permitted by district regulations” in MBMC Section 10.04.030. Furthermore, “dwelling unit” is defined as “one (1) or more rooms with a single kitchen, designed for occupancy by one (1) family for living and sleeping purposes.”

The definition of “family” is in compliance with State requirements, as it does not require a certain relationship among the members, nor does it limit the size or specify other characteristics. Therefore, the definition of “family” does not constrain or limit development of residential care facilities or other specialized housing for unrelated individuals and those with disabilities or special needs.

#### 2.2.5 Emergency Shelters, Transitional Housing, and Supportive Housing

State law (Assembly Bill [AB] 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing, and establishes transitional and supportive housing as a residential use. Therefore, local governments cannot treat it differently from other similar types of residential uses (e.g., requiring a Use Permit when other residential uses of similar function do not require a Use Permit).

##### Transitional Housing

Transitional housing is longer-term housing, typically up to 2 years. Transitional housing generally requires that residents participate in a structured program to work toward established goals so that they can move on to permanent housing. Residents are often provided with an array of supportive services to assist them in meeting goals. The Zoning Code defines transitional housing as “rental housing operated under program requirements that terminate assistance to residents and recirculate the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six (6) months from the initial occupancy date of the recipient.”

Under SB 2, transitional and supportive housing is deemed to be a residential use subject only to the same requirements and standards that apply to other residential uses of the same type in the same zone. The Zoning Code does not pose as a constraint to development because it allows transitional

housing as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone in accordance with State law.

### Supportive Housing

Supportive housing is defined in the Zoning Code as housing occupied by a specified target population defined in Section 50675.14 of the California Health and Safety Code that has no limit on length of stay and that is linked to on-site or off-site services that assist the resident in retaining the housing; improving his or her health status; and maximizing his or her ability to live, and, when possible, work in the community. The Zoning Code treats supportive housing as a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone.

Under AB 2162, supportive housing meeting specific standards shall be a use by right in all zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses. Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within 0.5 miles of a public transit stop (Government Code Section 65915).

**Program 285, Specialized Housing Types to Assist Persons with Special Needs**, of the Housing Element will amend the City's Zoning Code to comply with State law.

### Emergency Shelters

The MBMC allows emergency shelters by-right in the Public and Semi-Public (PS) and Industrial Park (IP) zones. These districts include vacant and underutilized parcels that could support emergency shelters, and also have good access to transit and other services. An application for a permit to establish and operate an emergency shelter shall be accompanied by a management plan that should incorporate the following: hours of operation, staffing levels and training procedures, maximum length of stay, size and location of exterior and interior on-site waiting and intake areas, admittance and discharge procedures, provisions for on-site or off-site supportive services, house rules regarding use of alcohol and drugs, on-site and off-site security procedures, and protocols for communications with local law enforcement agencies and surrounding property owners.

The MBMC does not currently include a specific parking requirement for any of these uses, other than standard residential requirements. **Program 285** of the Housing Element will amend the City's Zoning Code to ensure that parking requirements for emergency shelters accommodate the staff working in the shelter, but do not require more parking than other residential or commercial uses within the same zone (AB 139, 2019).

## 2.2.6 Low-Barrier Navigation Centers

Low-Barrier Navigation Centers are housing-first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. A Low-Barrier Navigation Center is defined as housing or shelter in which a resident who is experiencing homelessness, or at risk of homelessness, may live temporarily while waiting to move into permanent housing. SB 101 requires a jurisdiction to allow a Low-Barrier Navigation Center by-right in areas zoned for mixed use and nonresidential zones permitting multifamily uses if they meet the requirements of Article 12 (commencing with Section 65660) of Chapter 3, Division 1, Title 7 of the California Government Code.



The MBMC does not currently define Low-Barrier Navigation Centers; therefore, it also does not identify zoning districts in which this use is permitted. To comply with State law, the City would have to classify the use in MBMC Section 10.08 , Use Classifications, and then include it as a permitted use in the CL, CD, and CNE zones. **Program 285** of the Housing Element will amend the MBMC to permit the development of Low-Barrier Navigation Centers that meet the requirements of State law as a use by-right, without requiring a discretionary action, in mixed-use and nonresidential zones that permit multifamily uses (AB 101).

### 2.2.7 Employee Housing

Pursuant to the State Employee Housing Act (Section 17000 et seq. of the Health and Safety Code), employee housing for agricultural workers consisting of no more than 36 beds in group quarters, or 12 units or spaces designed for use by a single family or household is permitted by right in a zoning district that permits agricultural uses by right. Therefore, for properties that permit agricultural uses by right, a local jurisdiction may not treat employee housing that meets the above criteria any differently than an agricultural use.

The Employee Housing Act also requires that housing for six or fewer agricultural employees be treated as a regular residential use. This mandates that employee housing shall not be required to apply for any additional permit or process that would not be required of a residential structure in the same zone.

Employee housing is not currently defined in the MBMC; accordingly, no specific provisions are included regarding this use. However, the City does not currently have any zones that permit agricultural uses given that no agricultural land exists in the City. If the Zoning Code is ever amended to add a zoning district that permits agricultural uses, **Program 25** of the Housing Element commits the City to make all corresponding MBMC amendments related to agricultural workers and current employee housing requirements.

### 2.2.8 Single-Room Occupancy Units

State law mandates that local jurisdictions address the provision of housing options for extremely low-income households, including single-room-occupancy (SRO) units. SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other.

The MBMC does not currently define or include provisions for SROs. However, MBMC Section 10.08.050.DD.2 defines residential hotels as “buildings with six (6) or more guest rooms without kitchen facilities in individual rooms, or kitchen facilities for the exclusive use of guests, and which are intended for occupancy on a weekly or monthly basis.” Residential hotels are similar to SRO facilities and are conditionally permitted in the General Commercial (CG) zone. In accordance with the MBMC, residential hotels require 1.1 parking spaces per room. Requiring more than 1 parking space per room may pose a constraint to development; however, the City is currently evaluating parking regulations, and anticipates requirements being updated within the next year, including a revision to required parking for residential hotels to 0.9 spaces per room.

## 2.3 Building Standards and Enforcement

Building and safety codes are adopted to preserve public health and safety, and to ensure the construction of safe and decent housing. These codes and standards have the potential to increase the cost of housing construction and/or maintenance. Further, required permits and processes associated with development can extend project timelines and associated costs.

In an effort to increase transparency of the development permitting process, the California Legislature adopted AB 1483 in 2019 (Government Code section 65940.1) to require jurisdictions to post detailed information regarding development proposal requirements. A jurisdiction shall make all of the following available on its website, as applicable, and update any changes to the information within 30 days of the change:

- A current schedule of fees, exactions, and affordability requirements imposed by the city, applicable to a proposed housing development project, which shall be presented in a manner that clearly identifies the fees, exactions, and affordability requirements that apply to each parcel.
- All zoning ordinances and development standards, which shall specify the zoning, design, and development standards that apply to each parcel.
- The list required to be compiled of information that will be required from any applicant for a development project.
- The current and five previous annual fee reports or the current and five previous annual financial reports.
- An archive of impact fee nexus studies, cost of service studies, or equivalent, conducted by the city on or after January 1, 2018.

The City has complied with the new transparency law requirements on the City's website in conformance with AB 1483, and as outlined in **Program 12, Developer Outreach and Transparency, of the Housing Element**, the City will maintain current information on the City's website and update relevant information that is applicable for housing development project proposal requirements within 30 days of any changes, consistent with AB 1483.

### 2.3.1 Building Code Requirements

State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic, or topographic conditions, and requires that local governments making changes or modifications in building standards report such changes to the Department of Housing and Community Development and file an expressed finding that the change is needed. The City has adopted the most recent Building Standards Code and local amendments to the following codes: 2019 California Building Code, 2019 California Residential Code, 2019 California Electrical Code, 2019 California Plumbing Code, 2019 California Mechanical Code, 2019 California Existing Building Code, 2019 California Green Building Standards Code, 2019 California Energy Code, 2019 California Administrative Code, 2019 California Historical Building Code, 2019 California Referenced Standards Code, and 1997 Uniform Code for the Abatement of Dangerous Buildings under Ordinance No. 19-0015. The City adopted findings stating that amendments to certain provisions were necessary because of the unique climatic, geological, and

topographical conditions prevailing within the City. The City's adopted local amendments and associated findings were accepted by the Building Standards Commission. The amended provisions do not pose an unnecessary constraint to housing development.

### 2.3.2 Code Enforcement

The City has an active code enforcement program that responds to complaints of substandard structures. In addition, a Report of Residential Building Records is required each time a property is sold, which serves to alert all parties to unpermitted and potentially substandard construction that may exist on the subject site.

Code enforcement staff accept reports of possible code violations and respond directly to violations related to compliance with the MBMC, including zoning, property maintenance, illegal dwelling units, trash container regulations, and sign violations. Possible violations regarding substandard, nonstructural housing issues are referred to the Environmental Health Division of the Los Angeles County Department of Public Health. The County of Los Angeles Environmental Health Division is responsible for ensuring that residential housing is safe, sanitary, and fit for human habitation. This is accomplished through routine inspections of rental properties with five or more units, and investigations of complaints. From July 2016 to July 2021, the County of Los Angeles performed 52 inspections in the City of Manhattan Beach.

Through implementation of **Program 87, Code Compliance**, of the Housing Element, the City will continue to ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources.

### 2.3.3 Fair Housing and Americans with Disabilities Act

The Federal Fair Housing Act of 1968 and the Americans with Disabilities Act (ADA) are Federal laws intended to assist in providing safe and accessible housing. ADA provisions include requirements for a minimum percentage of units in new developments to be fully accessible for persons with physical disabilities. Compliance with these regulations may increase the cost of housing construction and the cost of rehabilitating older units, which may be required to comply with current codes. However, the enforcement of ADA requirements is the best way to ensure that there is housing available and accessible to meet the needs of all residents, especially those with special needs. The City requires full compliance with ADA regulations when applicable to a project. This, in turn, ensures that housing projects that are subject to ADA regulations account for persons with disabilities, thereby increasing the accessible housing stock within the City.

The Community Development Block Grant (CDBG) Program provides for the development of viable urban communities by providing decent housing, a suitable living environment, and expanded economic opportunities primarily for low- and moderate-income residents, as well as older adults and people with disabilities. Eligible activities under the CDBG Program include activities related to housing, other real property activities (code enforcement, historic preservation), public facilities, activities related to public services, activities related to economic development, and assistance with community-based

development organizations. CDBG funds may be used for the acquisition, construction, reconstruction, rehabilitation, or installation of certain public improvements or public facilities. Since 2016, the City has used its annual CDBG allocation for infrastructure improvements, specifically installation of ADA-compliant curb ramps throughout City intersections. Most recently (as of fiscal year 2018), CDBG funds were allocated to the implementation of the Manhattan Senior Villas ADA Pathway Project. These efforts supported the installation of an ADA-compliant concrete pathway, perimeter railing, directional signage, curb ramp, and gutter to create unobstructed paths of travel and accessibility for older adults and those with disabilities to Manhattan Senior Villas, located at 1300 Parkview Avenue. Construction is anticipated to begin this year (2021). Through implementation of **Program 5, Americans with Disability Act (ADA) Improvements Program**, the City will ensure that the Manhattan Senior Villas ADA Pathway Project is completed by 2022 to increase accessibility for older adults and people with disabilities in the City. Following completion of the Senior Villas ADA Pathway Project, the City will use future CDBG funds for additional ADA improvements focused on bringing existing, non-compliant ramps into ADA compliance at various locations throughout the City, as identified by the Public Works Department. These improvements will increase accessibility for people with disabilities throughout the City.

In addition, the City has included a number of programmatic measures to comply with the Federal Fair Housing Act in the Housing Element, including the following:

- Providing fair housing referral services with the Housing Rights Center, including landlord/tenant counseling, outreach and education, and discrimination investigations.
- Developing a handout for developers to be made aware of Fair Housing advertisement material compliance and making it available at the City Hall counter.
- Supporting and participating in the Regional Analysis of Impediments to Fair Housing Choice in coordination with the Community Development Commission of the County of Los Angeles and the Housing Authority of the County of Los Angeles.

#### 2.3.3.1 Reasonable Accommodation Procedures

The City is required by the Federal Fair Housing Act and the California Fair Employment Housing Act to provide a process for consideration of reasonable accommodation requests. The process shall include a deviation procedure that is available to applicants for circumstances where the existing zoning regulations would preclude residential development for persons with disabilities.

In conformance with State and Federal fair housing laws, MBMC Section 10.85 establishes the City's procedures related to requests for reasonable accommodations from the strict application of the City's land use and zoning regulations to allow people with disabilities an equal opportunity to use and enjoy a dwelling. "Reasonable accommodation" means any deviation requested and/or granted from the City's zoning and land use laws, rules, regulations, policies, procedures, practices, or any combination thereof that may be reasonable and necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling.

To make housing available to people with disabilities, any eligible person may request a reasonable accommodation from the strict application of land use, zoning and building regulations, policies, practices, and procedures. Any information identified by an applicant as confidential shall be retained in a manner so as to respect the privacy rights of the applicant and shall not be made available for public

inspection unless required by State or Federal law. A request for a reasonable accommodation may be filed at any time that the accommodation may be necessary to ensure equal access to housing. A reasonable accommodation does not affect a person's obligations to comply with other applicable regulations not at issue in the requested accommodation.

Requests for a reasonable accommodation shall be reviewed by the Community Development Director (Director), and may, in their discretion, refer applications to the Planning Commission for consideration. The request for a reasonable accommodation shall be approved, or approved with conditions, if the reviewing authority finds that all of the following findings can be made:

- A. The dwelling, which is the subject of the request for reasonable accommodation, will be used by a disabled person;
- B. The requested accommodation is necessary to make housing available to a disabled person;
- C. The requested accommodation will not impose an undue financial or administrative burden on the City; and
- D. The requested accommodation will not require a fundamental alteration in the nature of the City's Zoning Ordinance.

The written decision on the request for reasonable accommodation shall explain in detail the basis of the decision, including all findings. The written decision shall be final, unless the applicant appeals the decision.

While requests are seldomly referred to the Planning Commission for their consideration, and there are no public hearing or noticing requirements tied to Planning Commission review, the Zoning Code does not outline the bases on which a decision on the matter could or should be deferred to the Planning Commission. In an effort to proactively remove ambiguities that may impose extra constraints for people with disabilities, **Program 254, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**, of the Housing Element will amend the reasonable accommodation procedures to remove discretionary referrals to the Planning Commission so that requests shall be reviewed and may be granted by the Community Development Director. In addition, the City will develop materials and outreach methods to increase public awareness and ease of access to policies, programs, and processes addressing reasonable accommodation.

## 2.4 Development Processing Procedures

Local processing and permit procedures can constrain the development of housing through unnecessary discretionary permit requirements, lengthy permit processing timelines, and subjective requirements that leave uncertainties in the overall development design and density. Discretionary actions can be required for development design reviews, required Use Permits, zone or plan amendments, and subdivisions. Whereas ministerial, or by-right, permits involve application of objective standards and criteria.

Further, in accordance with Section 65913.4 of the California Government Code, also known as SB 35, a permit applicant may submit an application for a development that is subject to the streamlined, ministerial approval process and is not subject to a Conditional Use Permit if they meet the objective planning standards, as outlined in the Government Code and as summarized as follows:

- Multifamily housing developments on infill sites zoned for residential or residential mixed-use.
- A minimum of 10 percent of the units are dedicated as affordable to households earning 80 percent or less of the area median income.
- For developments with 10 or more units, a prevailing wage requirement is included in all contracts for the performance of work.

Jurisdictions do not need to adopt a local ordinance to implement the ministerial processing provided by SB 35. The City reports annually on any applications received pursuant to SB 35. To proactively remove any potential constraints to development, the City will revise internal permitting procedures to ensure that staff has clear procedures for responding to proposals for SB 35 streamlining and for prioritizing qualifying SB 35 housing developments consistent with State law through implementation of **Program 3, Affordable Housing Streamlining**, of the Housing Element.

#### 2.4.1 Precise Development Plan

Precise Development Plans (PDPs) are intended to encourage the development of affordable housing through a streamlined permitting process. Projects in the RM, RH, and RPD zones that qualify for a density bonus pursuant to State density bonus law shall be eligible for a PDP (MBMC Section 10.84.010). Applications for PDPs shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, and plans and mapping documentation in the form prescribed by the Community Development Director; and
2. A vicinity map showing the location and street address of the development site.

The Director shall approve, conditionally approve, or disapprove applications for PDPs. An application for a PDP shall be approved if, on the basis of the application, plans, materials, and testimony submitted, the decision-making authority finds the following:

1. The proposed project is consistent with the General Plan and Local Coastal Program; and
2. The physical design and configuration of the proposed project are in compliance with all applicable zoning and building ordinances, including physical development standards.

Failure to make all the required findings shall require denial of the application. In approving a PDP, reasonable conditions may be imposed as necessary to make the required findings. Unless appealed, the PDP shall become effective after expiration of the time limits for appeal.

To minimize constraints to the development of affordable housing that may result from discretionary permitting procedures, the City will amend the Zoning Code to ensure PDP applications are subject only to an administrative non-discretionary approval process through implementation of **Program 3** of the Housing Element.

As previously mentioned, multifamily projects in residential zones that qualify for a density bonus pursuant to State density bonus law shall be eligible for a PDP. It is worth noting that while the intent of

the 5th Cycle Housing Element policies was to extend the PDP process to density bonus projects in the CL, CNE, and CD zones, the Code amendments that followed the adoption of the 5th Cycle Housing Element did not implement the policies as described in the Housing Element; therefore, the commercial land uses table in MBMC Section 10.16, and as shown in Tables 2 and 4 of this analysis, still reference Use Permits (see Section 2.4.3) as the applicable application process for residential or mixed-use projects in the CL, CNE, and CD zones, with no mention of the PDP process. As such, through implementation of **Program 15-18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts**, of the Housing Element, the City will amend the Zoning Code to permit residential uses without requiring approval of a Use Permit in the CL, CD, and CNE zones, and provide streamlined processing for projects that qualify for a density bonus.

## 2.4.2 Site Development Permit

Site Development Permits (SDPs) are intended to streamline the permitting process for market-rate multifamily housing developments of six or more units (MBMC Section 10.84.010). Multifamily projects are permitted in the residential zones (RM, RH, and RPD) subject to an SDP. Pursuant to MBMC Section 10.84.030, applications for Site Development Permits shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, plans and mapping documentation in the form prescribed by the Director;
2. A vicinity map showing the location and street address of the development site;
3. A map showing the location and street address of the property that is the subject of the amendment and of all lots of record within five hundred feet (500') of the boundaries of the property; and
4. A list, drawn from the last equalized property tax assessment roll or the records of the County Assessor, Tax Collector, or the City's contractor for such records showing the names and addresses of the owner of record of each lot within five hundred feet (500') of the boundaries of the property. This list shall be keyed to the map required by subsection (C) of this section and shall be accompanied by mailing labels.

The Planning Commission shall hold a public hearing on an application for a Site Development Permit and shall approve said permit if, on the basis of the application, plans, materials, and testimony submitted, the decision making authority finds that:

1. The proposed project is consistent with the General Plan and Local Coastal Program.
2. The physical design and configuration of the proposed project are in compliance with all applicable zoning and building ordinances, including physical development standards.

Unless appealed, the SDP shall become effective after expiration of the time limits for appeal.

As in the case of the PDP, the 5th Cycle Housing Element policies intended to extend the SDP process to market rate residential and mixed-use projects in the CL, CNE, and CD zoning districts, but the Code amendments that followed the adoption of the 5th Cycle Housing Element failed to implement this policy as intended in the commercial land uses table of MBMC Chapter 10.16. In accordance with MBMC Section 10.84.020, the Planning Commission currently approves, conditionally approves, or disapproves applications for SDPs; however, the 5th Cycle Housing Element specifically identified that the Planning Commission's review of SDPs are limited to confirming that the project complies with applicable

development standards, and does not examine the appropriateness of the use itself. Although Zoning Code revisions to the SDP application process are not included through implementation of the 6th Cycle Housing Element's programs, the City will evaluate necessary revisions and amend the Zoning Code, if feasible, to clearly reflect the review process for SDPs intended by the 5th Cycle Housing Element, and remove constraints to development.

### 2.4.3 Conditional Use Permit (Use Permit)

Commonly known as Conditional Use Permits. Use Permits are required for use classifications typically having unusual site development features, or operating characteristics requiring special consideration so that they may be designed, located, and operated compatibly with uses on adjoining properties and in the surrounding area. Pursuant to MBMC Section 10.84.030, the Planning Commission shall approve, conditionally approve, or disapprove applications for Use Permits.

Applications for Use Permits shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, plans and mapping documentation in the form prescribed by the Director;
2. A vicinity map showing the location and street address of the development site;
3. A map showing the location and street address of the property that is the subject of the amendment and of all lots of record within five hundred feet (500') of the boundaries of the property; and
4. A list, drawn from the last equalized property tax assessment roll or the records of the County Assessor, Tax Collector, or the City's contractor for such records showing the names and addresses of the owner of record of each lot within five hundred feet (500') of the boundaries of the property. This list shall be keyed to the map required by subsection (C) of this section and shall be accompanied by mailing labels.

The Planning Commission shall hold a public hearing on an application for a Use Permit. An application for a Use Permit shall be approved if, on the basis of the application, plans, materials, and testimony submitted, the Planning Commission finds that:

1. The proposed location of the use is in accord with the objectives of this title and the purposes of the district in which the site is located;
2. The proposed location of the use and the proposed conditions under which it would be operated or maintained will be consistent with the General Plan; will not be detrimental to the public health, safety or welfare of persons residing or working on the proposed project site or in or adjacent to the neighborhood of such use; and will not be detrimental to properties or improvements in the vicinity or to the general welfare of the city;
3. The proposed use will comply with the provisions of this title, including any specific condition required for the proposed use in the district in which it would be located; and
4. The proposed use will not adversely impact nor be adversely impacted by nearby properties. Potential impacts are related but not necessarily limited to: traffic, parking, noise, vibration, odors, resident security and personal safety, and aesthetics, or create demands exceeding the capacity of public services and facilities which cannot be mitigated.



Failure to make all the required findings shall require denial of the application. In approving a Use Permit, reasonable conditions may be imposed as necessary to make the required findings. Unless appealed, the Use Permit shall become effective after expiration of the time limits for appeal.

#### 2.4.4 Variances

Variances are intended to resolve practical difficulties or unnecessary physical hardships that may result from the size, shape, or dimensions of a site, or the location of existing structures thereon, from geographic, topographic, or other physical conditions on the site or in the immediate vicinity, or from street locations or traffic conditions in the immediate vicinity of the site. Pursuant to MBMC Section 10.84.010, Variances may be granted with respect to fences, walls, landscaping, screening, site area, site dimensions, yards, height of structures, distances between structures, open space, off-street parking and off-street loading, and performance standards.

Authorization to grant Variances does not extend to use regulations because sufficient flexibility is provided by the Use Permit process for specified uses and by the authority of the Planning Commission to determine whether a specific use belongs within one or more of the use classifications listed in MBMC Chapter 10.08. Further, MBMC Chapter 10.96 provides procedures for amendments to the zoning map or zoning regulations.

The Planning Commission shall approve, conditionally approve, or disapprove applications for Variances. Applications for Variances shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fee, copies of deeds, any required powers of attorney, plans and mapping documentation in the form prescribed by the Director;
2. A vicinity map showing the location and street address of the development site;
3. A map showing the location and street address of the property that is the subject of the amendment and of all lots of record within five hundred feet (500') of the boundaries of the property; and
4. A list, drawn from the last equalized property tax assessment roll or the records of the County Assessor, Tax Collector, or the City's contractor for such records showing the names and addresses of the owner of record of each lot within five hundred feet (500') of the boundaries of the property. This list shall be keyed to the map required by subsection (C) of this section and shall be accompanied by mailing labels.

The Planning Commission shall hold a public hearing on an application for a Variance. An application for a Variance shall be approved if, on the basis of the application, plans, materials, and testimony submitted, the decision making authority finds that:

1. Because of special circumstances or conditions applicable to the subject property—including narrowness and hollowness or shape, exceptional topography, or the extraordinary or exceptional situations or conditions—strict application of the requirements of this title would result in peculiar and exceptional difficulties to, or exceptional and/or undue hardships upon, the owner of the property;
2. The relief may be granted without substantial detriment to the public good; without substantial impairment of affected natural resources; and not be detrimental or injurious to

- property or improvements in the vicinity of the development site, or to the public health, safety or general welfare; and
3. Granting the application is consistent with the purposes of this title and will not constitute a grant of special privilege inconsistent with limitations on other properties in the vicinity and in the same zoning district and area district.
  4. OS District Only. Granting the application is consistent with the requirements of Section 65911 of the Government Code and will not conflict with General Plan policy governing orderly growth and development and the preservation and conservation of open-space laws.

Failure to make all the required findings shall require denial of the application. In approving a Variance, reasonable conditions may be imposed as necessary to make the required findings. Unless appealed, the Variance shall become effective after expiration of the time limits for appeal set forth in MBMC Section 10.100.030.

#### 2.4.5 Minor Exceptions

Minor Exceptions are generally intended to allow certain alterations and additions to certain nonconforming pre-existing structures, and to allow the establishment of new ADUs within legal pre-existing structures that do not comply with the ADU development standards. Minor Exceptions are also intended to encourage home remodeling and additions to existing smaller, older, legal non-conforming homes. The provisions strive to balance the community's desire to maintain smaller, older homes while still allowing some flexibility to encourage these homes to be maintained, upgraded, and enlarged below the maximum allowed square footage instead of being replaced with larger new homes.

Applications for all Minor Exceptions shall be initiated by submitting the following materials to the Community Development Department:

1. A completed application form, signed by the property owner or authorized agent, accompanied by the required fees, plans and mapping documentation in the form prescribed by the Director.
2. Written statements to support the required findings and criteria of this Code section.
3. A vicinity map showing the location and street address of the development site.

As specified in MBMC Section 10.84.120, certain Minor Exception requests require public notice, while others do not. After the commenting deadline date, if any, and within 30 days of receipt of a completed application, the Director shall approve, conditionally approve, or deny the required exception. The Director of Community Development shall send the applicant a letter stating the reasons for the decision under the authority for granting the exception, as provided by the applicable sections of this chapter. The letter also shall state that the Director's decision is appealable. In making a determination, the Director shall be required to make the following findings:

- a. The proposed project will be compatible with properties in the surrounding area, including, but not limited to, scale, mass, orientation, size and location of setbacks, and height.
- b. There will be no significant detrimental impact to surrounding neighbors, including, but not limited to, impacts to privacy, pedestrian and vehicular accessibility, light, and air.

- c. There are practical difficulty which warrants deviation from Code standards, including, but not limited to, lot configuration, size, shape, or topography, and/or relationship of existing building(s) to the lot.
- d. That existing non-conformities will be brought closer to or in conformance with Zoning Code and Building Safety requirements where deemed to be reasonable and feasible.
- e. That the proposed project is consistent with the City's General Plan, the purposes of this title and the zoning district where the project is located, the Local Coastal Program, if applicable, and with any other current applicable policy guidelines.

In approving a minor exception permit, the Director may impose reasonable conditions necessary.

#### 2.4.6 Density Bonus Requirements

Under State law (AB 2345, 2020), cities and counties must provide a density increase up to 50 percent over the otherwise maximum allowable residential density under the Municipal Code and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with units affordable to low- or moderate-income households. The City has a standard application and review procedure for processing density bonus applications as part of housing development applications, as included in MBMC Section 10.94.050. MBMC Chapter 10.94, Affordable Housing Density Bonus and Incentive Program, was last updated in 2013 to include density bonus regulations in conformance with State law. Since then, State density bonus laws have been updated (pursuant to Government Code Sections 65915–65918). Discrepancies in MBMC Chapter 10.94 that must be addressed to comply with 2021 density bonus regulations include, but are not limited to, the following:

- The maximum allowed percentage density bonus must be increased from the MBMC's existing maximum of 35 percent to 50 percent to reflect the allowances found in Government Code Section 65915(f).
- Remove the limit on one incentive or concession for senior housing developments found in Section 10.94.040(A)(2) of the MBMC.
- In addition to the three affordable housing concessions or incentives currently offered in Section 10.94.040(A)(4) of the MBMC, current State law (2021) allows for a fourth incentive for projects that are located within 0.5 miles of a transit stop. The application shall also receive a height increase of up to three additional stories or 33 feet.
- The first required finding the City may use to deny a requested incentive or concession in Section 10.94.040(B)(1) of the MBMC must be updated to reflect the latest language for the first required finding found in Government Code Section 65915(d)(1)(A).
- The required parking for units with two to three bedrooms in Section 10.94.040(C)(2) of the MBMC should be revised from two required on-site spaces per unit to one-and-a-half on-site parking spaces per unit.

The City incentivizes development of affordable housing by abiding by the local and State density bonus regulations. In addition, to further incentivize affordable units, multifamily projects in residential (RM, RH, and RPD) zones that qualify for a density bonus are eligible for a streamlined approval process, which will be further revised to ensure an administrative non-discretionary approval process through implementation of **Program 3** of the Housing Element. In addition, implementation of **Program 15-18** of the Housing Element will provide a streamlined approval process for multifamily projects that qualify for

a density bonus in the mixed-use (CL, CD, and CNE) zones (refer to Section 2.4.1, Precise Development Plan, for additional details).

As stated in Section 10.94.010, General Affordable Housing Provisions, of the MBMC and in Government Code Section 65915, the granting of a density bonus, concession or incentive, shall not require, or be interpreted, in and of itself, to require a general plan amendment, local coastal plan amendment, zoning change, or other discretionary approval. As such, the city-wide election requirements under MBMC Section 10.12.030 for certain amendments to development standards in the RS, RM, and RH zones do not restrict the ability of the City to provide flexibility for development under State Density Bonus Law.

## 2.4.7 Typical Permit Procedures

State planning and zoning law provides permit processing requirements for residential development. Within the framework of State requirements, the City has structured its development review process to minimize the time required to obtain permits while ensuring that projects receive careful review. The permit review and approval process for single- and multifamily residential developments is described below.

### Single-Family Development

Single-family development on a previously subdivided lot is a straightforward process. A building permit application is submitted, and plans are reviewed by the City to ensure compliance with City laws and standards, including planning and zoning standards such as building height and setbacks. Building permits are issued administratively and do not require a public hearing. The City does not have any separate design review-process.

If a project is located in the Coastal Zone, a Coastal Development Permit (CDP) is also required. Administrative CDP approval by the Director is required for any new single-family residence and multifamily residence (excluding remodels and additions) in the non-appealable area of the Coastal Zone. In the appealable area of the Coastal Zone (within 300 feet of the inland extent of any beach), administrative CDP approval by the Director is required for any new single-family and multifamily residence, as well as an increase of 10 percent or more of the internal floor area of the existing structure or the construction of an additional story or increase in building height of more than 10 percent. Any project located within the Coastal Zone compares similarly to a regular plan check located outside the Coastal Zone, with no extra requirements and findings, aside from those that ensure consistency with the Local Coastal Program as follows:

1. That the project, as described in the application and accompanying materials, as modified by any conditions of approval, conforms with the certified Manhattan Beach Local Coastal Program; and
2. If the project is located between the first public road and the sea, that the project is in conformity with the public access and recreation policies of Chapter 3 of the Coastal Act of 1976 (Commencing with Section 30200 of the Public Resources Code).

–The City’s LCP has been certified by the California Coastal Commission. Therefore, the City processes its own Coastal Permits, saving time and money for applicants since they do not need to seek separate approval from the California Coastal Commission. Processing time for a CDP is typically 8 to 10 weeks. Note that development pursuant to an approved CDP shall not commence until the CDP is effective. The CDP is not effective until all appeals, including those to the Coastal Commission, have been exhausted.

In the event that the Coastal Commission denies the permit or issues a permit on appeal, the CDP approved by the City is void. Action by the Director may be appealed to the Planning Commission. Action by the Planning Commission may be appealed only to the City Council. However, if the project is located in the appealable area of the Coastal Zone, it may be directly appealed to the Coastal Commission within 10 days of the decision.

Single-family subdivisions and condominiums require approval of a subdivision map. Condominium projects with three or more units require approval of a Use Permit. The typical time required is 3 to 5 months for review and approval for projects requiring a Use Permit.

### Multifamily Development

Multifamily projects in the mixed-use zones (CL, CNE, and CD) are currently permitted subject to a Use Permit. The typical time required is 3 to 5 months for review and approval for projects requiring a Use Permit. However, **Program 15-18** of the Housing Element will provide a streamlined approval process for qualifying projects in the mixed-use zones.

Multifamily projects in the residential zones (RM, RH, and RPD) with five units or fewer are permitted without a discretionary permit (approved by the Director with no public hearing). The typical time required for review and approval of an administrative permit is 8 to 10 weeks. Multifamily developments with six or more units require SDP approval by the Planning Commission. The processing time for an SDP is typically 5 months. Multifamily developments with six or more units that qualify for a density bonus pursuant to State density bonus law shall be eligible for PDP approval by the Director. The typical time required for review and approval of a PDP requiring Director approval is 2 to 5 months.

For development projects, potential delays in processing development applications and plans can increase time and costs considerably. Additionally, discretionary processes create uncertainty in the development process and increase project timelines. **Programs 3, 185, and 251** of the Housing Element aim to remove discretionary requirements in the development process.

**Table 8, Permit Processing Timelines**, provides approximate timelines for typical development approvals within the City.

Table 8. Permit Processing Times	
Action/ Request	Processing Time
Environmental Impact Report	8–12 months
Negative Declaration	6–9 months
General Plan Amendment	8–12 months
Zone Change	8–12 months
Tentative Parcel Map	5 months
Tract Map	5 months
Variance	3–4 months
Use Permits	5 months
Administrative Permit	8–10 weeks
Design Review	No Applicable Design Review in the City
Plan Review	239–250 days
Other Ministerial or Discretionary Permits – Precise Development Plan,	2–5 months

## 2.5 Development Fees and Improvement Requirements

Fees are charged by the City to cover processing costs and staff time, and also to defray the cost of providing public services and facilities to new developments. By State law, fees cannot exceed costs to the City generated by the activity for which the fee is assessed. Permit processing and impact fees are described below.

### 2.5.1 Permit Processing Fees

For projects that do not require a hearing (e.g., Administrative CDP or PDP), a permit fee of \$1,509 or \$4,077, respectively, is assessed. In cases involving land subdivision, such as a condominium project, a tract map must be approved. Parcel Map fees range from \$1,397, if no public hearing is needed, and up to \$3,546. For a Tract Map, the fee would be \$1,493 if there is also another discretionary application, such as a Use Permit or Variance, and \$4,074 if no discretionary application is requested in conjunction. Condominium projects requiring a Use Permit (two-unit condos are exempt) are assessed a \$8,393 fee.

Development and development impact fees are provided at the end of this appendix in **Exhibit A, City of Manhattan Beach Planning and Zoning User Fee Schedule**.

### 2.5.2 Impact Fees

In addition to permit processing fees, developments are subject to impact fees to help fund the cost of providing public services and facilities. Water and sewer fees are necessary to ensure that these services will be available to serve new developments. The City's impact fees include: a school fee (\$4.08 per square-foot of living area), a park fee and public art fee (detailed and discussed below), and a water and sewage fee (fees vary, based on number of fixtures for new construction only). Based on recent projects in the City, water and sewage fees for a single-family home with five bathrooms are approximately \$4,080 per unit and \$1,225 per unit for multifamily projects. Based on the lower fees associated with multifamily units, this is not considered a constraint to the development of multifamily projects.

For single-family or condo developments, \$1,817 per dwelling unit is assessed for park purposes in accordance with the Quimby Act. Multifamily rental projects are exempt from park fees; therefore, this is not a constraint to the development of affordable, multifamily developments.

In accordance with MBMC Chapter 10.90, the City charges a fee for art in public places. The fee is equal to 1 percent of the building valuation and is not assessed on residential projects of fewer than four units. The City does not charge a traffic impact fee. While these fees are not insubstantial, they constitute only about 2 percent of the value of a typical owner-occupied residence and about 1.5 percent of the total value of a multifamily apartment and are therefore not considered a constraint to development.

Exhibit A at the end of this appendix provides a full list of fees that the City requires from their current fee schedule.

**Table 9, Typical Fees for Single-Family and Multifamily Development**, summarizes processing fees and impact fees for typical single-family and multifamily developments in the City. The examples provided in Table 9 are based on recent single-family and multifamily projects approved in the City, including all plan check, permit, planning and impact fees that are most commonly required for single-family or multifamily projects, which were based on the current fee schedule provided in Exhibit A.

<b>Table 9. Typical Fees for Single-Family and Multifamily Development</b>		
<b>Planning/Building Fees</b>	<b>Single-Family*</b>	<b>Multifamily**</b>
<b>Processing Fees</b>		
Parcel Map	N/A	\$1,397
Coastal Development Permit	\$1,509	N/A
Site Development Permit <sup>1</sup>	N/A	\$6,388
Plan Check	\$7,733.55	\$23,297.02
Record Retention Fee	\$191	\$191
<b>Impact Fees</b>		
Quimby/Parkland Fee <sup>2</sup>	N/A	N/A
School District Fees	\$4.08 per square foot (assuming 3,300 square feet) = \$13,464	\$4.08 per square foot (assuming 13,000 net square feet) = \$53,040
Public Art Fees	N/A	1% of project valuation \$35,334.21
Traffic Impact	N/A	N/A
Water and Sewage	\$4,082.85	\$13,479.25 (based on 11 units)
Waste Management	Fee included in plan check fee.	Fee included in plan check fee.
<b>Estimated Total Fees</b>	<b>\$26,980.40</b>	<b>\$97,792.27</b>
Source: City of Manhattan Beach, 2021. N/A = not applicable * Single-family residence based on a 5-bedroom, 5-bathroom development. ** Multifamily residence based on an 11-unit development. <sup>1</sup> <u>As explained in Section 2.4.1, Precise Development Plan, projects that qualify for a density bonus pursuant to State density bonus law are eligible for a Precise Development Plan. The fee for a Precise Development Plan is \$4,077.</u> <sup>2</sup> Quimby fee was not applicable in this example because the units were rental, and no subdivision map was requested.		

*Fees in Proportion to Total Development Cost Per Unit*

Overall, for a typical single-family project, a developer can expect to pay approximately \$26,980 per unit in total fees (including Plan Check, Permit, Planning, and impact fees). A multifamily project will cost a developer approximately \$8,890 per unit in total fees. The level of fees represents a very small portion of overall development costs in the City, especially given the high land cost. Furthermore, current and future housing activities are primarily focused on recycling of underutilized parcels into higher intensity residential uses.

Based on a recent development cost analysis for multifamily developments in California, provided in Section 3.1, Cost of Land and Construction, the average cost to develop a new multifamily unit in California is more than \$480,000 per unit. Based on this average development cost, the combined costs of permits and fees are approximately 1.9 percent of the cost of development.

Based on the median sale price from Realtor.com of \$3,100,000 for single-family homes in the City as of December 2021 and a lack of vacant land in the City, the combined costs of permits and fees are estimated to be less than 1 percent of the cost of development.

On average, a survey from the City's "Report on the Cost of Services (User Fee) Study<sup>3</sup>" completed February 2020, showed that the City's fees are in line with the jurisdictions surveyed. In addition, the City provides opportunities for projects that are eligible for a density bonus pursuant to State density bonus law to be permitted subject to a Precise Development Plan instead of a Site Development Plan. The fee for a Precise Development Plan is less than the fee for a Site Development Plan. Nevertheless, in order to mitigate the overall impact of fees on the feasibility of affordable housing development, the City will consider waiving or reducing fees for projects with lower- and moderate-income units.

### 2.5.3 On- and Off-Site Improvements

The City requires developers to provide on-site and off-site improvements necessary to serve their projects. Such improvements may include water, sewer and other utility extensions, sidewalks, street construction, and traffic control device installation that are reasonably related to the project. All streets, highways, alleys, ways, easements, rights-of-way, and parcels of land offered for dedication shall be developed and improved to the standards of the City. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities, and school sites, consistent with the Subdivision Map Act.

Pursuant to the provisions of Section 66411.1 of the Subdivision Map Act, the City may require dedication of rights-of-way, easements, and construction or reimbursement of reasonable off-site and on-site improvements for the parcels being created. Standards for design and improvement of subdivisions shall be in accordance with the applicable sections of Title 10 of the Zoning Code, the General Plan, and any Specific Plans adopted by the City. Prior to the approval by the City of the final map, the subdivider shall execute and file an agreement with the City specifying the period within which improvement work shall be completed to the satisfaction of the City Engineer, and providing that if the subdivider fails to complete the work within such period, the City may complete the same and recover the full cost and expense thereof from the subdivider. MBMC Chapter 11.20, Dedications and Improvements, provides the standards and requirements for all final maps.

## 2.6 Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing

Lower-income housing can be accommodated in all zones permitting residential use in Manhattan Beach. These may include ADUs in single-family zones and multifamily housing in the RH zone, and mixed-use or multifamily developments in the CD, CL, and CNE zones. Exclusive residential development is allowed subject to the RH development standards in the CD, CL, and CNE commercial zones. The RH standards allow more building floor area on a given parcel than the commercial development standards, so a strong incentive is created for high-density residential development in these commercial zones.

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<sup>3</sup> [Report on the Cost of Services \(User Fee\) Study, City of Manhattan Beach, 2020.](https://www.manhattanbeach.gov/home/showpublisheddocument/44350/637338561824300000)  
<https://www.manhattanbeach.gov/home/showpublisheddocument/44350/637338561824300000>



The following potential constraints were identified in this analysis, and local efforts to mitigate the constraints, as feasible, may include the following:

Parking Requirements for Multifamily Housing (Section 10.64.030 of the MBMC)

- Two-spaces parking requirement for multifamily residential units, including one enclosed space, and 0.25 space per unit for buildings with 4 or more units. Only 1 enclosed space is required for units with less than 550 square feet of floor area in buildings with less than four units.
  - Two-car parking required for all units, regardless of square footage, in the Coastal Zone.
  - Required dedicated guest parking space for each condominium unit.

While parking is typically perceived as a constraint to development, the provision of parking is needed to satisfy the requirements of the Zoning Code. In addition, the California Coastal Commission has repeatedly expressed the need to preserve public parking for visitor-serving uses, which can sometimes be affected by new development, and a reduction in parking below two parking spaces per dwelling unit could potentially result in impacts on existing public parking. However, parking requirements are most stringent for larger units and least stringent for smaller, more affordable units, including a reduction from two spaces to one space for units with less than 550 square feet of floor space in multifamily residential buildings with less than four units and a minimal requirement of 0.25 guest spaces per unit in multifamily residential buildings for buildings with 4 or more units.

To mitigate potential constraints to the development of housing affordable to lower- or moderate-income households, lower-income students, senior citizens housing development, as defined in Sections 51.3 and 51.12 of the Civil Code, or those with special needs, such as transitional foster youth, veterans with a disability, or people experiencing homelessness, the City provides reduced parking requirements for housing developments that qualify for a density bonus pursuant to State density bonus law.

Consistent with AB 2345 (2020), the City does not require a parking ratio that exceeds the following for a development that receives a density bonus:

- Studio / 1-bedroom Units – 1 space
- 2 Bedroom / 3 Bedroom Units – 1.5 spaces
- 4 or More Bedroom Units – 2.5 spaces

As of December 2021, two multifamily projects with affordable units in the City that qualify for a density bonus under State law, which are expected to be completed during the planning period, are utilizing the reduced parking ratios. See additional details in Section 5, Planned, Approved, and Prospective Projects, of Appendix E, Sites Analysis and Inventory.

While the City implements these parking ratios in accordance with current State density bonus law, as part of Program 11 of the Housing Element, the City commits to amending Section 10.94.040 - Affordable Housing Concessions and Incentives, of the MBMC to ensure the reduced parking ratios in the Zoning Code are consistent with AB 2345 (2020), so that the reduced parking ratios available are clear to any applicant who qualifies for a density bonus.

In addition to the reduced parking ratios currently offered, the City will conduct a parking study as part of Program 22, Parking Reductions, of the Housing Element to identify opportunities for additional

parking reductions for residential multifamily housing outside of the Coastal Zone, such as reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities.

#### Use Permit Requirements for Multifamily Housing

- Use Permit required for developments with three or more condominium units in accordance with Section 10.12.020 (B) of the MBMC.
- Use Permit required for multifamily housing in the CL, CD, and CNE zones in accordance with Chapter 10.16 of the MBMC.

The City will aim to mitigate this potential constraint through **Program 1518** of the Housing Element. ~~Through implementation of **Program 1518**, the City will amend the Zoning Code to permit residential uses without requiring approval of a Use Permit in the CL, CD, and CNE zones, and provide streamlined processing for projects that qualify for a density bonus.~~ Multifamily housing developments in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) Districts are currently permitted through approval of a Conditional Use Permit. To further incentivize affordable housing in the City and remove barriers to development, the City will remove the discretionary requirements for multifamily housing in the CL, CD, and CNE zones meeting the minimum requirements for a density bonus. Through implementation of **Program 18**, the City will review and amend the Zoning Code to permit residential uses in the CL, CD, and CNE zones without requiring approval of a Conditional Use Permit, and all projects that use the State density bonus will be eligible for streamlined approvals.

#### Open Space Requirements

- As required by Section 10.12.030 (M)(1) of the MBMC, open space (private and shared) in residential zones (RS, RM, and RH) shall equal 15 percent of unit size, with a minimum of 220 square feet of open space per unit.

While overly generous open space requirements may be perceived as a constraint to development, the City offers flexibility to mitigate potential constraints to development by including “outdoor or unenclosed area on the ground, or on a balcony, deck, porch or terrace designed and accessible for outdoor living, recreation, pedestrian access or landscaping” in the definition for usable open space. In addition, the City offers reduced minimum outdoor and/or private outdoor living area requirements for affordable housing projects that qualify for a State Density Bonus.

#### Minimum Lot Standards and Setbacks

Minimum lot standards and setbacks are typical of many areas of Southern California, and the 3-foot minimum side yard setback is the minimum required to maintain public safety and emergency access. A 5-foot front yard setback in Area Districts III and IV is relatively conservative, compared to the 20-foot minimum often required in inland areas and in other suburban areas. The minimum required area per dwelling unit allows for a range of densities, up to 51 dwelling units per acre, as shown in Table 6. In addition, the City offers reduced minimum lot sizes and/or dimensions and reduced minimum building setbacks and building separation requirements for affordable housing projects that qualify for a State Density Bonus.

Furthermore, the City does not generally prescribe a minimum floor area per dwelling unit. Units as small as 500 square feet currently exist in the City, primarily in El Porto and the northwest area of the City. In accordance with Zoning Code Section 10.12.050, a minimum floor area of 525 square feet per dwelling is required for units developed as part of a senior housing complex. As such, these are not considered a constraint to development.

#### Citywide Election

In accordance with MBMC Section 10.12.030, certain amendments to residential development standards in the RS, RM, and RH zones must be submitted to voters for approval. This provision applies to amending the following specific development regulations for the RS, RM, and RH residential zones standards: to increase the standards for the maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit. including amendments to increase the standards for maximum height of structures, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit. Thus, based on the city-wide election requirements for amendments to the specific development regulations of the RS, RM, and RH zones, increasing the current densities higher than the maximum 51 units per acre permitted in those residential zones would be difficult to achieve due to the need for parking and the desire of the residents for adequate living space. This limit is consistent with the repeatedly stated desires of the citizenry to maintain a small-scale community and the capacity of area roadways to serve development. However, this does not preclude the City from implementing incentives, concessions, and waivers, such as reduced parking requirements or reduced setback and minimum square footage requirements under State Density Bonus law for affordable housing as the granting of a density bonus shall not, in and of itself, be interpreted to require a general plan amendment, zoning change, or other discretionary approval.

As such, the city-wide election requirements under MBMC Section 10.12.030 are not considered a constraint to the development of affordable housing and do not restrict the ability of the City to provide flexibility for development under State Density Bonus Law or opportunities for the development of affordable housing.

Most recently, two multifamily projects in the project pipeline that include very low-income units and qualify for a density bonus under State law were approved by the City. The mixed-income projects, which are expected to be completed during the planning period, are utilizing density bonus and/or lot consolidation bonus incentives offered by the City to achieve densities that are above and beyond the maximum densities in the underlying zones. See additional details in Section 5, Planned, Approved, and Prospective Projects, of Appendix E.

However, through implementation of Program 2, Adequate Sites, of the Housing Element, the City will establish an overlay district that encompasses a minimum of 20.1-3 acres of sites in the General Commercial (CG) and Planned Development (PD) Districts. In accordance with current State housing law requirements, the sites will allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project. This will create the opportunity for future residential development to occur outside of the residential zones. The 20.3 acres of sites will be selected from Table 15, Potential Underutilized Sites for Overlay, of Appendix E, Sites Analysis and Inventory. The potential sites identified for the overlay will be located outside of the residential zones where the city-wide election requirements apply.

In addition, through implementation of **Program 15-18** of the Housing Element, the City will adopt development standards for multifamily residential and mixed-use projects in the three existing mixed-use commercial zones (CL, CD, and CNE), leaving more flexibility for appropriate residential and mixed-use development standards in those zones. Under Chapter 10.16, Commercial Districts, of the MBMC, portions of a building intended for residential use in a mixed-use project or purely residential developments in mixed-use zones are currently subject to the High-Density Residential District residential standards in Chapter 10.12, Residential Districts, of the MBMC. To minimize constraints to the development of affordable housing, including housing for extremely low- and very low-income households, the City will adopt development standards for multifamily residential and mixed-use projects in the three commercial mixed-use zones (CL, CD, and CNE) instead of deferring to the High-Density Residential standards, which are subject to voter approval for certain amendments to residential development standards. The City will ensure that the adopted standards for residential and mixed-use projects facilitate development at densities appropriate to accommodate lower-income housing and that they do not reduce the intensity of land use<sup>4</sup> or reduce the site's residential development capacity, consistent with the Housing Crisis Act of 2019.

In addition to the previously mentioned efforts to mitigate potential constraints, the City offers streamlined approvals and multifamily permitting processes, and will aim to further remove discretionary approval processes through several programs in the Housing Element. Furthermore, the City supports the production of affordable housing through land use incentives, such as the State density bonus law and lot consolidation incentives above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus; mixed-use designations that offer higher allowable densities, which can aid in reducing costs for affordable housing; and aiming to maintain residential neighborhoods and protect residential neighborhoods from the intrusion of incompatible and character-changing uses by prohibiting short-term rentals in residential zones.

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<sup>4</sup> In accordance with State law, "reducing the intensity of land use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site's residential development capacity.

### 3 Non-Governmental Market Constraints

This section identifies those non-governmental market factors and other financial factors that may affect the cost of new housing. There is little land in the City available for new construction. Also, in most instances, parcels are divided into small lots or have irregular-shaped lots that make residential development difficult. ~~The City has been unable to identify any factors subject to local control related to land, fees, labor, materials, and/or financing that would significantly reduce the cost for housing.~~ However, the City can support the production of affordable housing through land use incentives, such as the State density bonus law, streamlined approvals, and mixed-use designations that offer higher allowable densities, which can aid in reducing costs for affordable housing. Numerous programs in the Housing Element directly or indirectly remove or mitigate nongovernmental constraints by streamlining permitting processes, waiving fees, providing technical support, increasing certainty in the development process, and increasing opportunities for development sites through rezoning, such as through Program 3, Affordable Housing Streamlining, Program 16, Lot Consolidation Incentive, Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts, and Program 20, Objective Design Standards.

In addition, Program 9, Countywide Affordable Home Ownership Program, supports lower-income households looking to purchase a home through down payment and closing costs assistance, Program 10, Countywide Affordable Rental Housing Development, provides financial and technical assistance to acquire sites, develop affordable rental housing, and acquire and rehabilitate affordable rental housing, Program 29, Support for Those Experiencing Homelessness, aims to provide support through outreach and education, coordination of regional efforts to address homelessness, and housing navigation services, and Program 30, Surplus Lands, prioritizes local surplus lands available for housing development affordable to lower-income households, therefore connecting affordable housing developers to local surplus land.

#### 3.1 Cost of Land and Construction

According to a 2014 study commissioned by California’s four State-level housing agencies—the California Tax Credit Allocation Committee, California Debt Limit Allocation Committee, Department of Housing and Community Development, and California Housing Finance Agency—local and development-specific factors such as the type of housing (e.g., family units, special needs housing, SRO), land availability and affordability, community opposition, materials costs, and local building requirements (e.g., parking, design, density, quality and durability) all influence development costs for affordable housing. Land, construction, and financing costs represent the most significant non-governmental constraints in the production of housing for most income groups in the City.

Land costs within the City are increasing due to the built-out nature of the City, limited availability of land, and coastal proximity. Land is a major part of total development costs, especially in denser and more desirable areas.<sup>5</sup> Land costs for residential developments are often passed along to the consumer in the form of rent prices or home sale prices. While there is little to no availability of raw, vacant land in the City, based on the median listing price of 203 homes for sale in October 2021,<sup>6</sup> the average cost for

<sup>5</sup> UC Riverside School of Business, 2020. Demystifying the High Cost of Multifamily Housing Construction in Southern California. [https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR\\_CEFD\\_Multifamily\\_Housing\\_White-Paper\\_3\\_2020.pdf](https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR_CEFD_Multifamily_Housing_White-Paper_3_2020.pdf).

<sup>6</sup> <https://www.homes.com/manhattan-beach-ca/90266/what-is-my-home-worth/>.

land of developed properties is between \$300 and \$350 per square foot (\$1,210 per net square feet of the developed homes), with a median listing price of \$2,511,200.

Purchasing land accounts for roughly 10 percent to 20 percent of total development costs for a typical multifamily project. Land in high-resource areas with access to infrastructure, desirable land uses, and other community amenities costs more due to a higher demand. Although affordable housing developers typically work with local governments to develop affordable housing, there are limited resources available for the construction of affordable housing, making it hard to develop in areas with record high land costs. To supplement the shortage of funding and tax credits, it is necessary for the City to offer incentives to market-rate developers to provide affordable housing units. Between 2016 and 2019, the costs to develop a new affordable unit under the Low-Income Housing Tax Credit (LIHTC) program have increased from \$425,000 per unit to more than \$480,000 per unit.<sup>7</sup> The median total development costs for affordable housing projects in Los Angeles County increased from \$275,305 to \$434,823 per bedroom from 2013 to 2019.<sup>8</sup> This is reflected in recent statistics that indicate that the Southern California area is now the most expensive housing market in the country. The City has been unable to identify any factors subject to local control related to land, fees, labor, materials, and/or financing that would significantly reduce the cost for housing. However, the City will continue offering incentives and streamlined permitting procedures for developers in exchange for affordable housing units, such as through implementation of **Programs 3, 11, and 185, and 21** of the Housing Element.

Construction costs include both “hard” and “soft” costs. Hard costs, such as labor and materials, typically account for 50 percent to 70 percent of construction costs, and soft costs, such as architectural and engineering services, development fees, construction financing, insurance, and permitting, typically average around 20 percent to 30 percent of total costs, although they can be higher for subsidized affordable housing or complex projects. A significant cost factor associated with residential building involves the cost for building materials. These costs can account for more than half of the total construction cost. According to the latest Building Valuation Data release in 2019, the national average for development costs per square foot for apartments and single-family homes in 2019 were as follows:

- Type I or II, Multifamily: \$148.82 to \$168.94 per square foot
- Type V Wood Frame, Multifamily: \$113.88 to \$118.57 per square foot
- Type V Wood Frame, One- and Two-Family Dwelling: \$123.68 to \$131.34 per square foot

The costs of design, regulation, and operations do not vary much by building size, so larger buildings allow developers to spread these fixed costs over more dense developments. In general, construction costs can be lowered by increasing the number of units in a development, reflecting economies of scale in multifamily construction, until the scale of the project requires a different construction type that commands a higher per-square-foot cost. This is because construction costs change substantially depending on the building type. For example, high-rise concrete apartments might cost \$75 or more per square foot than a six-story wood-frame structure on a concrete podium. Apartments four stories or fewer can typically achieve an economy of scale, provided that the building has typical amenities and no

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<sup>7</sup> Terner Center for Housing Innovation, 2020. The Costs of Affordable Housing Production: Insights from California’s 9% Low-Income Housing Tax Credit Program. [https://ternercenter.berkeley.edu/wp-content/uploads/pdfs/LIHTC\\_Construction\\_Costs\\_March\\_2020.pdf](https://ternercenter.berkeley.edu/wp-content/uploads/pdfs/LIHTC_Construction_Costs_March_2020.pdf)

<sup>8</sup> Los Angeles County Development Authority, 2021. Affordable Housing Presentation to the Los Angeles County Board of Supervisors. <http://file.lacounty.gov/SDSInter/bos/supdocs/153603.pdf>.

structured parking. However, for smaller-scale and affordable or middle-income housing, onerous regulations can impose a significant burden. Because of the jump in construction costs, developers may not build to the maximum height or floor-to-area ratio. Mobile homes are significantly less expensive, as are precision- or factory-built housing products.

Labor costs also greatly contribute to construction costs. They are generally two to three times the cost of construction materials. A 2019 study for Smart Cities Prevail found that California lost about 200,000 construction workers since 2006. Many lost their job during the recession and found work in other industries. Before the COVID-19 pandemic, the industry already faced this historical shortage of skilled labor, and the labor gaps might get even larger, especially in states like California. California's shortage of needed construction workers, combined with rising prices in construction materials, also contributes to driving up construction costs.

The COVID-19 pandemic resulted in delays and shortages for some construction materials, and extended timelines and costs for many developments under construction. Construction delays only further constrain California's housing shortage, exacerbating the current supply-and-demand imbalance across much of the State as the housing market continues to see home prices accelerate with a record low supply of homes for sale.

## 3.2 Availability of Financing

Availability of financing for the construction of housing and for home ownership loans can greatly impact the housing market. While the City has been unable to identify any factors subject to local control related to land, fees, labor, materials, and/or financing that would significantly reduce the cost for housing, the City will continue offering incentives and streamlined processes, such as through implementation of **Programs 3, 185, and 251** of the Housing Element.

### Construction Financing

Construction loans are short-term, interim loans used for new home construction. Construction loans can be used to cover the cost of land, contractor labor, building materials, permits, and more. With a construction loan, the lender is unable to claim the residence as collateral and views these types of loans as riskier. Developers must usually supply at least 25 percent of the project value upfront, and perhaps more if the total cost is more than 75 percent of the estimated value of the project. Although there is no hard threshold for how much required upfront equity is too much before a residential project would be infeasible, the higher the proportion of equity required, the more unlikely that a developer would proceed with the project. Construction loans must also be paid off when the loan matures, typically 1 year or less. This can be done through the conversion of the loan to mortgage financing or by obtaining a mortgage to secure permanent financing to pay off the loan.

Although the City does not currently have any local ordinances that directly impact the cost of development, financing for residential projects, particularly affordable housing, is quite complex. The level of subsidies required for affordable housing projects necessitates the pooling of multiple funding sources. The County of Los Angeles offers several funding programs for affordable housing developers meeting eligibility requirements. The Los Angeles County Development Authority publicly releases its Notice of Funding Availability (NOFA), twice annually, with a focus on funding the development or rehabilitation of low-income rental housing. Funding sources include Measure H, No Place Like Home, and Measure JJJ. Additionally, the City supports the production of affordable housing through incentives

such as the State density bonus law and land use designations that offer higher allowable densities, which can aid in reducing costs for affordable housing.

### Mortgage Financing

Current (2021) interest rates for home loans are between 2 percent and 3 percent, depending on the terms and the down payment. Mortgage rates have been at a record low in recent months due to the COVID-19 pandemic, and recent policy statements from the Federal Reserve indicate that these rates will stay low for the foreseeable future. Although recent economic conditions have seen interest rates remain low, housing prices have skyrocketed, and buying a house or refinancing a mortgage is becoming less attainable for many households as banks raise requirements, such as minimum credit score. Loan applicants with short credit history, lower incomes, self-employment incomes, or other unusual circumstances have had trouble qualifying for loans or are charged higher rates.

Based on the median sale price of \$2,511,200 for homes in the City, and assuming a 10 percent down payment of \$251,120 and a 3.2 percent, 30-year fixed mortgage, monthly principle and interest would be approximately \$11,493. The down payment required to purchase a home combined with a high monthly payment represent major obstacles for most families.

## 3.3 Requests for Housing Developments at Reduced Densities

State law requires the Housing Element to include an analysis of requests to develop housing at densities below those anticipated in the Sites Inventory. Programs in the Housing Element include measures to streamline residential development projects, which limits opportunities for public opposition to result in reduced densities.

The City works closely with developers throughout the development process to ensure that there is clear understanding related to what they are allowed to build, and the corresponding maximum densities permitted. Furthermore, City staff work with developers to make sure they understand what their options are for developing affordable housing and the incentives or flexibility they have to make those options work in the City, and to evaluate options for how to get there.

## 3.4 Length of Time Between Project Approval and Applications for Building Permits

State law requires an analysis of the length of time between receiving approval for housing development and submittal of an application for a building permit. On average, the time is 3 to 4 months for the approval for a housing development after submittal of a completed application and plans for building permits that comply with all applicable regulations.



## 4 Environmental Constraints

### 4.1 Environmental Review

Environmental review is required for all discretionary development projects under the California Environmental Quality Act (CEQA). Due to their construction in a built-out environment, most projects in the City are either Categorical Exempt or require only an Initial Study and Negative Declaration. Developments that have the potential of creating significant impacts that cannot be mitigated require the preparation of an Environmental Impact Report. Most residential projects require a Negative Declaration that takes an additional 3 to 4 weeks to complete. ADUs are a ministerial process (non-discretionary) and, therefore, qualify for statutory exemption from CEQA. As a result, State-mandated environmental review does not pose a significant constraint to housing development.

### 4.2 Geologic and Seismic Hazards

Southern California lies on the edge of the Pacific Plate, one of the many puzzle-like pieces that fit together forming the Earth's crust. The continuous shifting and pushing of these crustal plates create ruptures and weaknesses termed "faults." Movement along a fault releases stored energy and tension, thereby producing earthquakes.

Although no surface faults are known to pass through the City, the City does lie above the Compton Thrust Fault. This type of fault does not rupture all the way up to the surface, so there is no evidence of it on the ground; it is "buried" under the uppermost layers of rock in the crust. In addition, several regional potentially active faults nearby can produce enough shaking to significantly damage structures and cause loss of life.

The level of damage in the City resulting from an earthquake will depend on the magnitude of the event, the epicenter distance from the City, the response of geologic materials, and the strength and construction quality of structures. While ground shaking itself can cause damage, related effects such as liquefaction, landslides, and tsunami inundation are also of concern.

### 4.3 Flooding

No portions of the City lie within any federally designated flood zone. Localized flooding represents the only flood concern. Historically, localized flooding has resulted in damaged properties. Flooding can occur in low topographic areas or where storm drains are unable to accommodate peak flows during a storm event. Generally, localized flooding dissipates quickly after heavy rain ceases. The topographical features in the City, local drainage infrastructure, and proximity to the ocean reduce any serious threat of storm flooding within the City. City engineering records indicate that localized flooding of consequence occurs roughly every 20 years. This has been an issue that the Public Works Department has been addressing for a number of years, particularly in the Tree Section. There are areas of the City that regularly flood during heavy storm events.

## 4.4 Other Environmental Constraints

### 4.4.1 Hazardous Materials

Industrial uses in the adjacent City of El Segundo may have an impact on the City's residents. The Chevron Oil Refinery, El Segundo Generation Station, and other industrial uses occupy properties just north of the City and are adjacent to many homes. Northrop Grumman (formerly TRW Inc. – Space and Electronics), with locations in Redondo Beach and Manhattan Beach, handles hazardous materials. Fire and/or spills of chemicals and petroleum can release hazardous materials into the air that may warrant an evacuation of surrounding areas. The Hyperion Water Reclamation Plant is the City of Los Angeles's oldest and largest wastewater treatment facility and is located 1.5 miles north of the City of Manhattan Beach. The plant has been operating since 1894. The plant has been expanded and improved numerous times over the last 100+ years.

A report by the California Energy Commission identified three major types of hazards associated with the El Segundo Power (Generation Station) Redevelopment Project. These include the accidental release of ammonia, hydrazine vapor mishandling, fire, and explosion from natural gas. Mitigation measures have been introduced to reduce the threat of public exposures to these hazards, as well as alternative use of chemicals that are less hazardous.

The Manhattan Beach Fire Department Fire Prevention Division participates in a local hazardous materials program through a joint agreement with the Los Angeles County Fire Department. Division responsibilities include cleanup of spills, leaks, and illegal dumping, and monitoring hazardous materials within businesses in the City.

### 4.4.2 Fire Risk

Urban fires represent the sole fire threat in the City. The City's narrow streets and alleys, steep topography, densely developed housing, and extensive on-street parking can limit the access of fire trucks and other emergency vehicles, particularly longer vehicles. Several roadways in downtown and North End/El Porto cannot accommodate longer wheelbase fire engines. The Fire Department has identified all impassible roadways and uses designated alternative routes to quickly gain access to all properties within the City. The Fire Department also regularly practices maneuvering on narrow streets with large vehicles to analyze access limitations and develop routing alternatives in the event of responding to an emergency within an identified issue area.

### 4.4.3 Liquefaction

Liquefaction is a phenomenon in which the stiffness of a soil is reduced when ground shaking causes water-saturated soil to become fluid and lose its strength. Earthquake-induced liquefaction and related phenomena can cause significant damage, creating problems with buildings, buried pipes, and tanks. Liquefaction hazard areas in the City have been identified along the coast, particularly the sandy areas of the beach. Only lifeguard towers and a partial portion of the Pier are located in liquefaction areas.

### 4.4.4 Landslides

The strong ground motions that occur during earthquakes are capable of inducing landslides, generally where unstable soil conditions already exist. Prior to the 1920s, when beach sand was hauled away to

facilitate development, the City was known to have significantly large sand dunes, ranging from 50 to 70 feet in height. Past indication of these sand dunes is evidenced in the North End of the City, particularly at Sand Dune Park. The North End is the only area of the City where landslides hazards and unstable soil have been recognized.

#### 4.4.5 Coastal Zone

Section 65590 of the California State Government Code requires the inclusion of low- or moderate-income housing in new residential development in the Coastal Zone where feasible. Due to land costs, it would not be feasible to provide very low-, low-, or moderate-income housing on single-family or small multifamily lots within the City's Coastal Zone without very large subsidies. There are no large vacant lots available for housing complexes that would accommodate large numbers of dwelling units within the Coastal Zone. However, significant development opportunities exist within the Coastal Zone on underutilized commercial properties in the CD, CNE, and CL zones.

The City has a certified LCP. The LCP was certified by the California Coastal Commission in 1994 and, therefore, the City is able to issue its own Coastal Permits. The LCP addresses three primary issue areas: public access, locating and planning for new development, and the preservation of marine-related resources. The LCP includes a number of policies that affect the ability to develop new housing within the coastal areas of the City. These include policies related to the preservation of beach access, the provision of adequate parking (including requiring adequate off-street parking to be provided in new residential development), and controlling the types and densities of residential development within the Coastal Zone. Those coastal policies related to residential development within the Coastal Zone include the following:

1. Policy II.B.1: Maintain building scale in Coastal Zone residential neighborhoods consistent with Chapter 2 of the Implementation Plan.
2. Policy II.B.2: Maintain residential building bulk control established by development standards in Chapter 2 of the Implementation Plan.
3. Policy II.B.3: Maintain Coastal Zone residential height limit not to exceed 30 feet as required by Sections A.04.030 and A.60.050 of Chapter 2 of the Implementation Plan.
4. Policy II.B.4: The beach shall be preserved for public beach recreation. No permanent structures, with the exception of bikeways, walkways, and restrooms, shall be permitted on the beach.

At the same time, the City seeks to process permits in the Coastal Zone as efficiently as possible. As noted above, certification of the City's LCP allows the City to process Coastal Permits locally, saving the time and expense of a separate Coastal Commission approval.

### 4.5 Infrastructure Capacity

Residential development during the 6th Cycle will primarily occur on properties that have previously been developed. As such, existing infrastructure, including water, sewer, and dry utilities, including electricity, natural gas, cable, and telephone, are available at all sites identified in the Sites Inventory (see **Appendix E**). The City's utilities receive necessary upgrades and improvements based on future growth and development anticipated by the General Plan.

The City is the direct provider of water, sewer, and storm drain maintenance.

### 4.5.1 Storm Drain Facilities

In regards to storm drain facilities, the goals and policies of the Infrastructure Element of the General Plan aim to ensure adequate capacity to collect and carry stormwater and thereby avoid flooding and reduce pollutant loads in stormwater as part of regional efforts to improve water quality in surface waters. Stormwater runoff flows directly into the City's storm drain system via street gutters and other inlets, and this flow in turn discharges into the County of Los Angeles flood control network, which ultimately drains into the Pacific Ocean. The Los Angeles County Department of Public Works maintains the regional storm drain system, including two major pump plants (Polliwog Pond and Johnson Street) in the City.

With regard to capacity, the established system is adequate to handle most runoff. However, during unusually heavy storm events, the system can become overwhelmed, with flooding occurring in the areas shown in Figure CS-3 of the City's General Plan Safety Element. The City has assessed the cost to correct isolated deficiencies, with the determination that significant investment will be required to address the issue. The main deficiency occurs in the County of Los Angeles–owned trunk line that collects flow from more than 50 percent of the City and empties at the beach at 28th Street. Rough estimates indicate that at least \$20 million would be needed to add necessary capacity to eliminate flooding in certain areas.

### 4.5.2 Water Supply/Service

The City obtains water from three sources: (1) Metropolitan Water District treated surface water from Northern California and the Colorado River, which is provided to the City by the West Basin Municipal Water District and represents over 80 percent of the local water supply; (2) groundwater extracted by City-owned and operated wells; and (3) reclaimed water supplied for landscape irrigation from the West Basin Municipal Water District. The City owns the right to pump 64,468 acre-feet per year of groundwater from the West Coast Basin. Imported water flows to the City via a 45-inch Metropolitan Water District line in Manhattan Beach Boulevard.

The City's water system consists of pump stations, storage reservoirs, an elevated storage tank, water supply wells, a settling basin, and approximately 112 miles of distribution pipelines. In addition to these facilities, the City provides access to reclaimed water supplies via a major pipeline in Marine Avenue. Reclaimed water can be used for landscape irrigation and some industrial uses, and can reduce demand on potable water supplies.

Given that Land Use Policy (Figure LU-3 in the City's General Plan Land Use Element) accommodates a very modest level of growth in the City, these facilities were not expected to require any substantial expansion to meet long-term needs. The City plans to focus efforts on maintenance and replacement as needed.

The City's 2010 Master Plan identified 10 major projects related to water supply to improve the existing system and provide for any future growth. In order of priority, the projects are replacement of Peck Reservoir; replacement of the Block 35 Ground Level Reservoir; replacement of the Larsson Pump Station; installation of a new solid state type control system at the 2nd Street Booster Pump Station; installation of seismic vibration isolators at the 2nd Street Booster Pump Station; construction of a new well and associated discharge pipe; installation of a new well collection line from Well 11A to Block 35; installation of new fire hydrants; and an annual pipe replacement program.

A project to replace the Peck Reservoir is currently in process (2021), as this was identified as a top priority in the City's 2010 Water Master Plan.

#### 4.5.3 Sewer

The City owns, operates, and maintains the local wastewater collection and pumping system. The City's owned and operated sewer collection system is made up of a network of gravity sewers, pump stations, and force mains. The gravity system consists of approximately 81.6 miles of pipe and 2,086 manholes and clean outs. The system also includes six pump stations and 5,114 feet of associated force mains. Collected effluent is treated at the Joint Water Pollution Control Plant in Carson, operated by the Sanitation Districts of Los Angeles County. The sewer main to Carson tunnels under Sand Dune Park and connects the east and west portions of the City. The collection system appears to serve the City adequately. The City has undertaken a complete inspection of the entire system via video, and priorities for line replacement have been established to ensure long-term reliability.

In 2017, the City updated its Sewer System Management Plan and presented it to the State Water Resources Control Board. The Sewer System Management Plan identifies goals the City has set for the management, operation, and maintenance of the sewer system. Sewer upgrade projects, as outlined in the FY2022–2026 Capital Improvement Plan, include rehabilitation or replacement of gravity sewer mains annually throughout the City; reconstruction/modification of the Poinsettia Sewage Lift Station and installation of a second force main; improvement of the Pacific Avenue Sewage Lift Station and installation of a second force main; improvement of the Voorhees Sewage Lift Station and installation of a second force main; and improvement of the Palm Lift Station and construction of emergency storage.

#### 4.5.4 Electric Power and Natural Gas

Southern California Edison provides electric service to residents and businesses in the City. The City's Capital Improvement Program outlines funding to remove the high-voltage power poles on Rosecrans Avenue to improve the corridor visually. The City is pursuing implementation, with Southern California Edison, on a number of undergrounding projects in residential areas. The projects will be financed through assessment districts.

Southern California Gas Company provides natural gas service to residents and businesses in the City. There are no upgrades to natural gas services that the City is aware of at this time.

## 5 Quantified Objectives

Based on the City’s needs, resources, constraints, and programs outlined in the Housing Element, **Table 10, Summary of Quantified Objectives for 6th Cycle (2021–2029)**, summarizes the quantifiable objectives for the 6th Cycle. The quantified objectives estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period. The quantified objectives do not represent a ceiling on development, but rather set a target goal for the City to achieve.

<b>Table 10. Summary of Quantified Objectives for 6th Cycle (2021–2029)</b>				
<b>Income Category</b>	<b>6th Cycle RHNA</b>	<b>New Construction</b>	<b>Rehabilitation</b>	<b>Conservation/ Preservation</b>
Extremely Low	161	161	0	0
Very Low	161	140	0	21
Low	165	136	8	21
Moderate	155	105	8	42
Above Moderate	132	132	0	0
<b>TOTALS</b>	<b>774</b>	<b>674</b>	<b>16</b>	<b>84</b>

# **EXHIBIT A - City of Manhattan Beach User Fee Schedule**

**Community Development Department Fees.....Page 2**

**Non Community Development Department Fees.....Page 20**

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
<b>PLANNING FEES</b>					
		<b>Use Permits:</b>			
20-085	Use Permit	Review an application for use permit for conformity with code requirements.	Use Permit	\$ 6,396.00	\$ 8,393.00
		<b>Master Use Permits:</b>			
20-086		Review an application for a master use permit for conformity with code requirements.	Master	\$ 9,875.00	\$ 10,908.00
20-087		Review an application to amend a master use permit for conformity with code requirements	Amendment	\$ 5,126.00	\$ 7,414.00
20-088		Review an application for a conversion to a master use permit from a use permit for conformity with code requirements.	Conversion	\$ 4,704.00	\$ 5,035.00
20-089	Planned Development	Review an application for a Commercial Planned Development for conformity with code requirements.	Commercial	\$ 9,342.00	\$ 7,864.00
20-090		Review an application for a Residential Planned Development for conformity with code requirements.	Residential	\$ 6,244.00	\$ 8,393.00
20-091	Planned Development (continued)	Review an application for a Sr. Citizen Residential Planned Development for conformity with code requirements.	Sr. Citizen Residential	\$ 6,244.00	\$ 8,393.00
20-092	Coastal Development Permit	Review an application for a coastal development that involves a public hearing in an appealable area or an administrative permit, or a request to transfer an ownership of a coastal development permit.	Administrative	\$ 1,324.00	\$ 1,509.00
20-093			Hearing	\$ 4,871.00	\$ 3,948.00
20-094			Hearing w / another discretionary application	\$ 2,142.00	\$ 1,940.00
20-095			Transfer	\$ 165.00	\$ 155.00
20-096	Variance	Review an application for a variance from the terms of the Zoning Code.		\$ 6,184.00	\$ 8,421.00

NOTE: ALL OTHER FEES NOT DEFINED IN THIS TABLE ARE BASED ON FULLY BURDENED RATES AND ARE EXECUTED AT THE DISCRETION OF THE CITY MANAGER



**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-097	Minor Exception	Review a proposed minor exception from the terms of the Zoning Code.	Without Notice - Small Project or Revision	\$ 1,477.00	\$ 353.00
20-098			With Notice or larger project or 3,000+ sq. ft.	\$ 1,985.00	\$ 1,575.00
20-099	Sign Exception	Review a proposed sign exception from the terms of the Zoning Code.		\$ 4,082.00	\$ 3,125.00
20-100	Tentative Parcel Map Review	Reviewing a tentative parcel (4 or fewer lots / units) map to identify any special conditions and determine extent to which it complies with appropriate code and State Subdivision Map Act Requirements.	Administrative	\$ 1,333.00	\$ 1,397.00
20-101			Hearing	\$ 3,622.00	\$ 3,546.00
20-102			Hearing w / another discretionary application	\$ 1,402.00	\$ 1,301.00
20-103	Tentative Tract Map Review	Reviewing a tentative tract map (more than 4 lots or units) to identify any special conditions and determine extent to which it complies with appropriate code and State Subdivision Map Act Requirements.	Hearing	\$ 4,134.00	\$ 4,074.00
20-104			Hearing w / another discretionary application	\$ 1,338.00	\$ 1,493.00
20-105	Lot Line Adjustment	Reviewing the proposed change to the property boundary into the same or fewer lots and issuing a certificate of compliance.		\$ 1,153.00	\$ 1,184.00
20-106	Certificate of Compliance	Review of records in order to determine compliance with the Subdivision Map Act.		\$ 1,653.00	\$ 1,652.00
20-107	Development Permit Amendment	Review an application for amending a Use Permit, Variance, Development Agreement and Residential, Commercial, or Senior Citizen Residential Planned Development.		\$ 4,949.00	\$ 5,035.00
20-108	Telecomm. Antenna Permit	Review an application for a Telecommunications Antenna Permit in order to ensure that it conforms to code requirements.	New - Private Property (Macro, Tower or other that is NOT a Small Cell or eligible facility)	\$ 2,746.00	\$ 2,428.00
20-109			Ammendment - Private property (Macro, Tower or other that is NOT a Small Cell or eligible facility)	\$ 1,172.00	\$ 1,706.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-110	Telecomm. Antenna Permit	Review an application for a Telecommunications Antenna Permit in order to ensure that it conforms to code requirements.	New in Public R-O-W (Tower or similar)	\$ 3,118.00	\$ 2,951.00
20-111			New or Ammendment to a Small Cell or eligible facility (Public Property, Private Property, and R-O-W)	\$ 1,358.00	\$ 2,307.00
20-112			New or Ammendment antenna on City property	\$ -	\$ 2,307.00
20-113			Appeal of Directors decision for public ROW to Hearing officer	Hearing Officer Rate	Hearing Officer Rate
20-114			Add on fee for all Telecom Permits as needed for consultants	Actual Cost	Actual Cost
20-115	Small Day Care Center Permit	Review of a small day care center to ensure that it complies with code requirements		\$ 329.00	\$ 334.00
20-116	Large Family Day Care Home Permit	Review an application for a permit for a large family day care home to ensure that it complies with code requirements, as well as inspecting the site.		\$ 1,225.00	\$ 1,224.00
20-117	Group Entertainment Permit	Review an initial application for Class I (on-going) permit or a Class II (one-occasion) which allows for entertainment either incidental with the business being conducted or for which admission is being charged.	Class I	\$ 607.00	\$ 612.00
20-118			Class II	\$ 662.00	\$ 670.00
20-119		Review an application for renewing an ongoing Class I Group Entertainment Permit.	Renewal	\$ 424.00	\$ 418.00
20-120	Alcohol License Public Determination	Review of a public determination of convenience and necessity of a proposed alcohol license		\$ 1,828.00	\$ 950.00
20-121	Alcohol / Live Music	Add-on to specific development permits with alcohol or live music.		\$ 110.00	\$ 108.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-122	Bodywork (Massage)	Review an application for an owner of bodywork (massage) business for compliance with City codes and standards.	Application - Owner	\$ 399.00	\$ 411.00
20-123		Review an application to change a business location for a bodywork operation.	Business Location Change	\$ 346.00	\$ 358.00
20-124		Review documentation of a bodywork (massage) application which is associated with another special type of business and meets certain criteria.	Exemption	\$ 346.00	\$ 199.00
20-125	Sign Permit	Review an application for a permanent sign for conformity with code requirements.	Single Tenant	\$ 325.00	\$ 361.00
20-126			Multi Tenant	\$ 489.00	\$ 510.00
20-127			Face Change	\$ 129.00	\$ 139.00
20-128		Review an application for a temporary sign for conformity with code requirements. <b>**Performance Bond also required.</b>	Temporary	\$ 227.00	\$ 247.00
20-129					
20-130	Sign Program	Administrative review of an application for a sign program for conformity with code requirements.		\$ 797.00	\$ 830.00
20-131	Temporary Use Permit	Review an application for an administrative permit for a temporary use permit.	Standard	\$ 787.00	\$ 816.00
20-132			Major	\$ 787.00	\$ 1,193.00
20-133	Home Occupation Permit	Review an application for a home occupation business use for conformity with zoning regulations.		\$ 65.00	\$ 68.00
20-134	Appeals	Process an appeal to the Planning Commission of an administrative decision. <b><i>This fee is set by Council Policy.</i></b>	Appeal to PC - Admin	\$ 500.00	\$ 500.00
20-135		Appeal an administrative decision to the City Council. <b><i>This fee is set by Council Policy.</i></b>	Appeal to CC - Admin	\$ 500.00	\$ 500.00
20-136		Process an appeal to the City Council of the PPIC - related to traffic. <b><i>This fee is set by Council Policy.</i></b>	Appeal to CC - PPIC (Traffic)	\$ 500.00	\$ 500.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-137	Appeals Cont.,	Process an appeal to the City Council of the PPIC - related to encroachment. <i>This fee is set by Council Policy.</i>	Appeal to CC - PPIC (Encroachment)	\$ 500.00	\$ 500.00
20-138		Process an appeal to the City Council of a Planning Commission Decision. <i>This fee is set by Council Policy.</i>	Appeal to CC - PC	\$ 500.00	\$ 500.00
20-139	Continuance	Review of a request by the applicant to continue the review of a development application to a future meeting prior to the meeting.	Standard	\$ 460.00	\$ 455.00
20-140			Extra Meeting	\$ 2,892.00	\$ 1,482.00
20-141	Time Extension Plan Review	Review administratively a request for an extension of time to complete a planning entitlement.	Administrative	\$ 327.00	\$ 334.00
20-142		Review an application for a time extension for completing a planning entitlement based upon the discretion of the Planning Commission.	Discretionary	\$ 2,334.00	\$ 2,332.00
20-143	Encroachment Permit	Review a permit for a right-of-way (permanent) private encroachment.	R-O-W Development	\$ 1,624.00	\$ 1,770.00
20-144		Review a permit for transfer, revision, or minor permanent private encroachment.	Transfer / Revision / Minor	\$ 758.00	\$ 767.00
20-145	City Fence Agreement	Review of a proposed non-standard fence which abuts the public right-of-way		\$ 319.00	\$ 353.00
20-146	New / Change Building Address Process	Processing a request to number or re-number a building lot.	Minor	\$ 339.00	\$ 348.00
20-147			Major	\$ 899.00	\$ 954.00
20-148	Planning Extra Plan Check	An hourly fee for plan checks over the standard number of plan checks within the Planning Dept.		\$ 151.00	\$ 136.00
20-149	Zoning Business Review	Review of a new business for conformance with Zoning Codes.		\$ 68.00	\$ 68.00
20-150	Outdoor Display Permit	Review an application to issue a permit for an outdoor display of merchandise in order to ensure conformity with code requirement.		\$ 160.00	\$ 159.00
20-151	Temporary Encroachment Permit (Sidewalk Dining Permit)	Review an application to issue a permit for a sidewalk dining permit in order to ensure conformity with code requirements.		\$ 283.00	\$ 192.00

NOTE: ALL OTHER FEES NOT DEFINED IN THIS TABLE ARE BASED ON FULLY BURDENED RATES AND ARE EXECUTED AT THE DISCRETION OF THE CITY MANAGER

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-152	Zoning Report	Providing written report on the zoning regulations for a particular property.		\$ 535.00	\$ 553.00
20-153	Zoning Code Interpretation	Reviewing a request for an interpretation of the Municipal Code regarding zoning and issuing a report on it.		\$ 463.00	\$ 466.00
20-154	Final Parcel Map Review	Reviewing final parcel map to determine extent to which it complies with appropriate code requirements. <b>**Map Copy Deposit of \$500</b>		\$ 539.00	\$ 601.00
20-155	Plan Check / Inspection - Landscape & Irrigation	Review an application for landscape and irrigation to conform to code requirements.	SFR 0 - 7,500 Sq. Ft.	\$ 595.00	\$ 503.00
20-156			MFR / Comm. / SFR > 7,500 Sq. Ft.	\$ 1,122.00	\$ 916.00
20-157	Reasonable Accommodation Process	Review a request to receive a reasonable accommodation for disabled persons		\$ -	\$ 343.00
20-158	Precise Development Plan - Affordable Housing	Reviewing a precise development plan specific to affordable housing requirements.		\$ -	\$ 4,077.00
20-159	Site Development Plan	Review a site development plan for Multi-Family Housing developments of 6 or more units.		\$ -	\$ 6,388.00
20-160	Emergency Shelters - PS and IP zones only	Review of emergency shelters for conformance with Zoning Code.		\$ -	\$ 2,583.00
20-161	Mills Act Contract	Contract Maintenance is an ongoing Annual Fee, starting one year after final approval of the Contract and annually thereafter for the life of the Mills Act contract. If done separately from Landmark Designation, then the following fees shall apply. If done the same time as designation - add on fee of \$1000 will apply		\$ -	\$ 7,455.00
20-162	Historic Preservation Designation	Review of applications for historic preservation designation.	Landmark	\$ -	\$ 1,000.00
20-163			Historic District	\$ -	\$ 1,000.00
20-164			Conservation District	\$ -	\$ 1,000.00
20-165			Amendment or Recession	\$ -	\$ 6,618.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-166	Historic Preservation Certificate of Appropriateness	Review of Historic Preservation Certificate of appropriateness.	Administrative	\$ -	\$ 2,146.00
20-167			Commission	\$ -	\$ 8,633.00
20-168			Economic Hardship	\$ -	\$ -
20-169	Noticing Fees	Support associated with conducting noticing on planning applications.	Coastal Permit - 100ft radius	\$ 72.00	\$ 182.00
20-170			Large Family Day Care - 100 ft radius	\$ 72.00	\$ 56.00
20-171			Minor Exception - 300 ft radius	\$ 72.00	\$ 129.00
20-172			Other Permits - 300-500 ft radius	\$ 72.00	\$ 263.00
20-173			Code, General Plan, or Zoning Amendments	\$ 72.00	\$ 588.00
<b>TRAFFIC ENGINEERING</b>					
20-174	Development (Parking) Traffic Review	Review of parking / traffic conditions for development permits, including environmental assessment and amendment to development permits.	Development Permits	\$ 1,149.00	\$ 879.00
20-175			Environmental Assessment / Amendment to Dev. Permits	\$ 711.00	\$ 1,516.00
20-176	Reserved Parking	Reserve parking per vehicle or moving van permit.	Per Parking Space	\$ 80.00	\$ 76.00
20-177	Parking Request	Administrative Review of a parking-related issue, such as a request for a red zone or disabled parking space. <i>This fee is set by Council Policy</i>		\$ 100.00	\$ 100.00
20-178	Traffic Request	Administrative Review of a limited scale traffic-related issue, such as a request for installation of a crosswalk or traffic calming measure. <i>This fee is set by Council Policy</i>		\$ 100.00	\$ 100.00
20-179	Stop Sign Request (2nd Request)	Processing a request to install a stop sign following initial denial / approval. <i>This fee is set by Council Policy</i>		\$ 500.00	\$ 500.00
20-180	Appeal to PPIC	Appeal an administrative decision to the Parking & Public Improvement Commission. <i>This fee is set by Council Policy</i>	Traffic	\$ 500.00	\$ 500.00
20-181			Encroachment	\$ 500.00	\$ 500.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-182	Construction Management and Parking Plan Review Fee	Supplemental traffic and parking review of remodels or minor projects.	Per Location		\$ 102.00
<b>BUILDING DIVISION FEES - FLAT AND MISCELLANEOUS</b>					
20-183	Building / Trades Permit Extension	Extension of building, mechanical, electrical, or plumbing permit prior to building permit expiration	Permit Extension	\$ 108.00	\$ 76.00
20-184	Building / Trades Permit Reinstatement	Reinstatement of an expired building, mechanical, electrical, or plumbing permit. <i>[See MBMC 9.01.050]</i>	Permit Reinstatement	\$ -	\$ 148.00
20-185	Building / Trades Plan Check Extension	Extension of building, mechanical, electrical, or plumbing plan check prior to plan check expiration	Plan Check Extension	\$ -	\$ 76.00
20-186	Building / Trades Plan Check Reinstatement	Reinstatement of expired plan check associated with building, mechanical, electrical, or plumbing permits.	Plan Check Reinstatement	\$ -	\$ 114.00
20-187	Building / Trades Extra Plan Check	Plan Checks over the standard number of plan checks or for non-standard applications.	Processing Fee	\$ 53.00	\$ 65.00
20-188			Hourly Rate	\$ 149.00	\$ 161.00
20-189	Re-Inspection / Extra Inspection	Request for a reinspection or extra inspection over the standard number of inspections (3) of a building site. (1-hr minimum)	Processing Fee	\$ 35.00	\$ 65.00
20-190			Hourly Rate	\$ 125.00	\$ 138.00
20-191	Custom Building Inspection	Inspection requested on a non-inspector working day. (4-hr min.)	Base Fee (4hrs)	\$ 535.00	\$ 582.00
20-192			Each Addl. Hour	\$ 125.00	\$ 138.00
20-193	Construction Operation After Hours Application	Reviewing an application for construction operation for work done after hours.	Request for Interior Commercial	\$ 186.00	\$ 149.00
20-194			Request for Exterior Commercial	\$ 186.00	\$ 733.00
20-195	Building Demolition	Review and inspection of a building demolition to ensure compliance with City Codes.	Partial	\$ 544.00	\$ 620.00
20-196			Full	\$ 544.00	\$ 423.00
20-197	Moving a Building	Review an application for moving a building within the City.		\$ 3,353.00	Actual Cost

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**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

<b>Reference Number</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE APRIL 18, 2020</b>
<b>20-198</b>	<b>Construction Site Sign Production</b>	Processing and production of contractor information signs for construction sites.	Base Fee	\$ 26.00	\$ 32.00
<b>20-199</b>			Per Sign	\$ 30.00	\$ 30.00
<b>20-200</b>	<b>Building Permit Transfer</b>	Transfer the ownership of a permit.		\$ 53.00	\$ 65.00
<b>20-201</b>	<b>Residential Bldg Records Report</b>	Provide a building records report on an address.	Per Application	\$ 309.00	\$ 294.00
<b>20-202</b>			Duplicate	\$ 53.00	\$ 43.00
<b>20-203</b>	<b>Staging Residential</b>	Review request for staging for residential properties.		\$ 761.00	\$ 295.00
<b>20-204</b>	<b>Temporary Certificate of Occupancy</b>	Review request for a temporary Certificate of Occupancy to allow for occupancy before the final certificate is issued.	Certificate	\$ 1,760.00	\$ 666.00
<b>20-205</b>			Extension	\$ 237.00	\$ 302.00
<b>20-206</b>	<b>Board of Building Appeals</b>	Processing an appeal of a Building Administrative Decision to the Board of Building Appeals.		\$ 488.00	\$ 938.00
<b>20-207</b>	<b>Comm Dev Refund Processing</b>	Processing a refund of a Community Development fee due to the actions of the applicant.		\$ 92.00	\$ 112.00
<b>20-208</b>	<b>Comm Dev Record Retention</b>	Retaining a permanent copy of records in Community Development.	Base Fee	\$ 35.00	\$ 43.00
<b>20-209</b>			Digital Copy	\$ 53.00	\$ 65.00
<b>20-210</b>			Data Extraction:	\$ 67.00	\$ 83.00
<b>20-211</b>	<b>Garage Sale Permit</b>	Review an application for a garage and yard sale permit. The municipal code allows 3 permits per household per year.		\$ 8.00	\$ 11.00



**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
<b>Building Permits (Combination)</b>					
20-212	Kitchen / Bathroom Remodel	Review and inspection of residential kitchen / bathroom remodels	Up to 500 sq ft	\$ -	\$ 825.00
20-213			501-1,000 sq ft	\$ -	\$ 1,100.00
20-214			1,000+ sq ft	\$ -	\$ 1,375.00
20-215			Each addl 500 sq. ft.	\$ -	\$ 287.00
20-216	New Pool / Spa	Review and inspection of new pool or spa being installed.	Residential	\$ 259.00	\$ 978.00
20-217			Commercial	\$ 259.00	\$ 1,423.00
20-218	New Pool / Spa with Vault	Review and inspection of new pool or spa with a vault	Residential	\$ 259.00	\$ 1,560.00
20-219			Commercial	\$ 259.00	\$ 2,037.00
<b>Building Permits (Miscellaneous)</b>					
20-220	Grading Fees - Plan Check	Review of application associated with reviewing different grading categories	51-1,000 CY	\$ 220.00	\$ 1,002.00
20-221			1,001-10,000 CY	\$ 220.00	\$ 1,245.00
20-222			10,001-100,000 CY	\$ 343.00	\$ 1,487.00
20-223	Shoring Plan Check and Inspection	Reviewing and inspection of shoring requirements	500 sq. ft.	\$ 780.00	\$ 1,189.00
20-224			1,000 sq. ft.	\$ 1,201.00	\$ 1,622.00
20-225			3,000 sq. ft.	\$ 3,713.00	\$ 1,812.00
20-226			5,000 sq. ft.	\$ 4,501.00	\$ 2,330.00
20-227	Solar Permit Plan Check and Inspection	Review and inspect Solar / PV Permits for building and fire codes <i>[Plan Check and Inspection are set by council at \$50 each and both are required for permit issuance]</i>	Residential	\$ 100.00	\$ 100.00
20-228			Commercial up to 50 kw	\$ 100.00	\$ 100.00
20-229			Commercial 51-250 kw	\$ 100.00	\$ 100.00
20-230	Summary of Accessibility Upgrades for Commercial Projects	Review of accessibility upgrade hardship application.	Existing Buildings Valued less than LA County Accessibility Code	\$ 286.00	\$ 1,132.00
20-231			Existing Buildings Valued more than LA County Accessibility Code	\$ 286.00	\$ 1,512.00
20-232	Remodel Residential Pool / Spa	Review and inspection of residential pool and spa remodels for each discipline reviewed (electrical, plumbing, mechanical)	Remodel - per discipline	\$ 259.00	\$ 655.00
20-233	Tenant Improvement Commercial Pool / Spa	Review and inspection of commercial pool and spa remodels for each discipline reviewed (electrical, plumbing, mechanical)	TI - per discipline	\$ 259.00	\$ 1,043.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-234	Residential Room Addition / Remodel	Review and inspection of residential room addition and / or remodel.	Up to 500 sq. ft.		\$ 954.00
20-235			501-1,000 sq. ft.		\$ 1,553.00
20-236			1,000+ sq. ft.		\$ 1,877.00
20-237			Each addl 500 sq. ft. above 1,000 sq. ft.		\$ 287.00
20-238	Windows / Doors	Review and inspection of window / door permits per City standard form.	Up to 5		\$ 550.00
20-239			Greater than 5		\$ 687.00
20-240	Tent Permit (Building)	Review and inspection of temporary tents	Up to 400 sq. ft.		\$ 1,208.00
20-241			401-1,500 sq. ft.		\$ 1,831.00
20-242			1,500+ sq. ft.		\$ 3,009.00
20-243	Decks / Porches / Patios / Pergolas / Gazebos	Review and inspection of standalone decks / porches / patios / pergolas. Gazebos	Up to 500 sq. ft.		\$ 2,312.00
20-244			Greater than 500 sq. ft.		\$ 3,243.00
20-245			Addl 500 sq. ft.		\$ 368.00
20-246	Fences (greater than 6')	Review and inspection of standalone fences greater than 6"	All Others		\$ 768.00
20-247			ROW Adjacent		\$ 946.00
20-248	Retaining Wall	Review and inspection of retaining walls and block walls.	Retaining Wall		\$1,362
20-249	Block Walls		Block Wall		\$917
20-250	Re-Roof	Review and inspection of re-roofing projects for residential and commercial projects  Note: Does not include reroof with solar. Separate permit required for solar panels.	Residential		\$ 542.00
20-251			Commercial - Up to 1,500 sq. ft.		\$ 542.00
20-252			Commercial - 1,501-5,000 sq. ft.		\$ 610.00
20-253			Commercial - Greater than 5,000 sq. ft.		\$ 679.00
20-254			Commercial - Each Addl. 1,000 sq.ft. above 5,000 sq.. ft.		\$ 103.00
20-255	Re-Stuccoing / Siding / Façade	Review and inspection of standalone re-stucco / siding / façade projects.			\$ 687.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
<b>Mechanical, Electrical, and Plumbing Permits</b>					
<b>Electrical</b>					
20-256	Miscellaneous Electrical Permit	Review and inspection of standard and standalone over the counter electrical projects.		\$ 68.00	\$ 315.00
20-257	Temporary Power Pole	Review and inspection for each temporary power pole or piggy-back pole.		\$ 112.00	\$ 315.00
20-258	EV Charging Station	Review and inspection of EV Charging Stations	Residential	\$ -	\$ 422.00
20-259			Commercial	\$ -	\$ 529.00
20-260	Battery Backup	Review, inspect and issue permit for battery backups.		\$ -	\$ 422
20-261	Residential Remodel / Addition	Electrical upgrades to residential additions or remodel projects	per sq. ft.	\$ -	\$ 0.74
20-262	Commercial Tenant Improvement	Electrical upgrades, additions, or improvement to commercial / non-residential projects	per sq. ft.	\$ -	\$ 0.58
<b>Mechanical</b>					
20-263	Miscellaneous Mechanical Permit	Review and inspection of standard and standalone over the counter mechanical permits.		\$ 68.00	\$ 283.00
20-264	HVAC Permit	Review and inspection of HVAC permits	New / Relocate	\$ 68.00	\$ 670.00
20-265			Replacement / Change-Out	\$ 68.00	\$ 464.00
20-266	Residential Remodel / Addition	Mechanical upgrades to residential additions or remodel projects	per sq. ft.	\$ -	\$ 0.65
20-267	Commercial Tenant Improvement	Mechanical upgrades, additions, or improvement to commercial / non-residential projects	per sq. ft.	\$ -	\$ 0.56

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
	<b>Plumbing</b>				
20-268	Miscellaneous Plumbing Permit	Review and inspection of standard and standalone over the counter plumbing permits.		\$ 68.00	\$ 315.00
20-269	Water Heater Permit	Review and inspection of water heater permit		\$ 92.00	\$ 283.00
20-270	Cesspool Removal Fee	Review and inspection for cesspool removal		\$ -	\$ 335.00
20-271	Residential Remodel / Addition	Plumbing upgrades to residential additions or remodel projects	per sq. ft.	\$ -	\$ 0.65
20-272	Commercial Tenant Improvement	Plumbing upgrades, additions, or improvement to commercial / non-residential projects	per sq. ft.	\$ -	\$ 0.56
	<b>Code Enforcement Fees</b>				
20-273	Violation Inspection Fee	Per hour violation inspection fee for code enforcement violations (2-hr min.)		\$ -	\$ 232.00
20-274	Non-Compliance Fee	Per Hour fee for non-compliance related inspections (6-hr min)		\$ -	\$ 697.00
<b>RIGHT-OF-WAY (ROW) FEES</b>					
20-275	Temporary Encroachment Permit - In ROW for Extended Period of Time		Pedestrian Canopy	\$ 247.00	\$ 310.00
20-276			Temp Fencing	\$ 247.00	\$ 310.00
20-277			Scaffolding	\$ 247.00	\$ 310.00
20-278			Extend	\$ -	\$ 60.00
20-279			Reinstate	\$ -	\$ 60.00
20-280	Street Use Permit - Temporary Use of Street Affecting Traffic		POD/ Roll-Off Bin or Lowboy	\$ 130.00	\$ 398.00
20-281			Crane	\$ 247.00	\$ 290.00
20-282			Concrete Pour	\$ 247.00	\$ 290.00
20-283			Delivery/Hauling of Materials	\$ 247.00	\$ 290.00
20-284			Storage of Materials	\$ 247.00	\$ 290.00
20-285			Equipment / Material Staging	\$ 247.00	\$ 290.00
20-286			Deposit for POD / Roll-Off Bin	\$ 465.00	\$ 465.00
20-287			Add-Ons	\$ -	\$ 53.00
20-288			Extend	\$ -	\$ 53.00

**CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020**

Reference Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-289	Public Works Permit - Generally Requires Special Rules or Review		Sandblasting	\$ 247.00	\$ 227.00
20-290			Vehicle on Strand or Walk Street	\$ 340.00	\$ 447.00
20-291			Over Quantitative Discharge	\$ 240.00	\$ 227.00
20-292			Well Monitoring	\$ -	\$ 227.00
20-293			Add-Ons	\$ -	\$ 60.00
20-294			Extend	\$ -	\$ 60.00
20-295	Excavation Permit - Involves Breaking Ground/Infrastructure		<b>Non-Utility Excavation</b>		
20-296			Curb & Gutter	\$ 231.00	\$ 337.00
20-297			Sidewalk	\$ 231.00	\$ 337.00
20-298			Driveway Approach	\$ 231.00	\$ 337.00
20-299			Add-Ons	\$ -	\$ 60.00
			Extend	\$ -	\$ 60.00
20-300	Excavation Permit - Involves Breaking Ground/Infrastructure		<b>Utility Excavation</b>		
20-301			Sewer Line	\$ 393.00	\$ 474.00
20-302			Water Line	\$ 393.00	\$ 474.00
20-303			Undergrounding	\$ 393.00	\$ 474.00
20-304			Sewer/Water Line Combo	\$ 393.00	\$ 474.00
20-305			Add-Ons	\$ -	\$ 60.00
			Extend	\$ -	\$ 60.00
20-306			<b>Utility Company Excavation</b>		
20-307			0-200 l.f.	\$ 393.00	\$ 641.00
20-308			200+ l.f.	\$ 1,038.00	\$ 1,128.00
20-309	200+ l.f. per l.f.	\$ 2.00	\$ 2.00		
20-310	Extra Inspections - per hr	\$ -	\$ 110.00		
	Extend	\$ -	\$ 60.00		
20-311	Lane Closure - Secondary Permit Only		Simple	\$ 247.00	\$ 106.00
20-312			Complex / Custom (incl. 1-hr of inspection)	\$ 931.00	\$ 453.00
20-313			Extra Inspections - per hr	\$ -	\$ 110.00
20-314			Add-Ons	\$ -	\$ 25.00
20-315			Extend	\$ -	\$ 25.00
20-316	Oversize Permit		Individual - <i>Set by Statute</i>	\$ 16.00	\$ 16.00
20-317			Annual	\$ 90.00	\$ 85.00
20-318			Extend	\$ -	\$ 25.00

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# COMBO PERMIT SQUARE FOOTAGE TABLE

## Combination Permits: New Construction and Tenant Improvements (includes Building, Mechanical, Electrical, and Plumbing)

Occupancy Type	Description	Sq Ft	Total Plan Check Cost		Total Inspection Cost		Total Cost Per Unit	
			Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft
<b>A - New (Other than A2)</b>	Assembly such as arenas, theaters, amphiteaters	500	\$3,957.79	\$106.78	\$3,603.90	\$97.23	\$7,561.68	\$204.01
		5,000	\$8,762.73	\$41.87	\$7,979.20	\$38.12	\$16,741.92	\$79.99
		50,000	\$27,602.59	\$55.21	\$25,134.47	\$50.27	\$52,737.06	\$105.47
<b>A2 - New</b>	Restaurant	500	\$4,816.83	\$129.95	\$4,557.58	\$122.96	\$9,374.41	\$252.91
		5,000	\$10,664.69	\$50.95	\$10,090.71	\$48.21	\$20,755.40	\$99.16
		50,000	\$33,593.78	\$67.19	\$31,785.74	\$63.57	\$65,379.52	\$130.76
<b>B or M - New</b>	Business or Retail	1,500	\$6,238.73	\$83.42	\$8,272.27	\$187.07	\$14,511.01	\$270.49
		5,000	\$9,158.57	\$196.91	\$14,819.56	\$318.62	\$23,978.13	\$515.53
		15,000	\$28,849.49	\$192.33	\$46,681.62	\$311.21	\$75,531.11	\$503.54
<b>E - New</b>	Educational Centers (i.e. Daycares)	500	\$3,647.99	\$98.42	\$5,091.09	\$137.35	\$8,739.08	\$235.77
		5,000	\$8,076.83	\$38.59	\$11,271.92	\$53.85	\$19,348.75	\$92.44
		50,000	\$25,442.01	\$50.88	\$35,506.56	\$71.01	\$60,948.57	\$121.90
<b>F-1, F-2 - New</b>	Factory	500	\$2,995.85	\$80.82	\$7,935.62	\$214.09	\$10,931.47	\$294.92
		5,000	\$6,632.95	\$31.69	\$17,569.84	\$83.94	\$24,202.79	\$115.64
		50,000	\$20,893.79	\$41.79	\$55,345.00	\$110.69	\$76,238.79	\$152.48
<b>H1-H5 - New</b>	Hazardous Occupancies (above the threshold specified by Building Code)	500	\$3,326.11	\$89.73	\$7,853.26	\$211.87	\$11,179.37	\$301.61
		5,000	\$7,364.16	\$35.18	\$17,387.49	\$83.07	\$24,751.65	\$118.26
		50,000	\$23,197.11	\$46.39	\$54,770.59	\$109.54	\$77,967.70	\$155.94
<b>I - New</b>	Institutions	500	\$4,133.71	\$111.52	\$5,091.09	\$137.35	\$9,224.80	\$248.87
		5,000	\$9,152.23	\$43.73	\$11,271.92	\$53.85	\$20,424.16	\$97.58
		50,000	\$28,829.54	\$57.66	\$35,506.56	\$71.01	\$64,336.10	\$128.67
<b>L - New</b>	Labrotaries	500	\$3,387.45	\$91.39	\$6,643.84	\$179.24	\$10,031.29	\$270.63
		5,000	\$7,499.98	\$35.83	\$14,709.77	\$70.28	\$22,209.75	\$106.11
		50,000	\$23,624.94	\$47.25	\$46,335.78	\$92.67	\$69,960.72	\$139.92
<b>R-1 - New</b>	Hotels / Motels	1,000	\$4,246.18	\$141.54	\$6,499.92	\$216.66	\$10,746.10	\$358.20
		10,000	\$16,984.72	\$40.57	\$25,999.66	\$62.11	\$42,984.39	\$102.68
		100,000	\$53,501.88	\$53.50	\$81,898.94	\$81.90	\$135,400.83	\$135.40
<b>R-2 - New</b>	Multi-Family / Apartment Housing	1,000	\$2,774.84	\$92.49	\$7,387.34	\$246.24	\$10,162.18	\$338.74
		10,000	\$11,099.35	\$26.52	\$29,549.37	\$70.59	\$40,648.72	\$97.11
		100,000	\$34,962.95	\$34.96	\$93,080.52	\$93.08	\$128,043.47	\$128.04

Note: All other fees not defined in this table are based on Direct Costs or Fully Burdened Rates and are executed at the discretion of the City Manager

## Combination Permits: New Construction and Tenant Improvements (includes Building, Mechanical, Electrical, and Plumbing)

Occupancy Type	Description	Sq Ft	Total Plan Check Cost		Total Inspection Cost		Total Cost Per Unit	
			Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft	Permit Fee	Per 100 Sq Ft
R-3 - New*	Custom Single-Family Home	1,000	\$3,116.22	\$118.79	\$4,183.18	\$182.03	\$7,299.39	\$300.83
		3,000	\$5,492.10	\$94.99	\$7,823.82	\$228.91	\$13,315.92	\$323.91
		6,000	\$8,341.85	\$139.03	\$14,691.25	\$244.85	\$23,033.10	\$383.88
S-1 - New	Low Hazard Warehouse / Parking Garage	500	\$2,402.78	\$64.82	\$4,722.98	\$127.42	\$7,125.75	\$192.24
		5,000	\$5,319.86	\$25.42	\$10,456.90	\$49.96	\$15,776.76	\$75.38
		50,000	\$16,757.57	\$33.52	\$32,939.23	\$65.88	\$49,696.80	\$99.39
S-2 - New	Moderate Hazard Warehouse / Parking Garage	500	\$2,267.75	\$61.18	\$5,535.03	\$149.33	\$7,802.78	\$210.51
		5,000	\$5,020.91	\$23.99	\$12,254.83	\$58.55	\$17,275.73	\$82.54
		50,000	\$15,815.86	\$31.63	\$38,602.70	\$77.21	\$54,418.56	\$108.84
U - New	Utility / Miscellaneous Structure	50	\$435.06	\$117.37	\$301.28	\$81.28	\$736.33	\$198.65
		500	\$963.24	\$64.22	\$667.04	\$44.47	\$1,630.27	\$108.68
		5,000	\$3,852.94	\$77.06	\$2,668.15	\$53.36	\$6,521.09	\$130.42
Shell (Cold) - New	Shell Building consisting only of foundation and empty structure.	500	\$3,188.31	\$86.02	\$4,461.30	\$120.36	\$7,649.60	\$206.38
		5,000	\$7,059.07	\$33.73	\$9,877.52	\$47.19	\$16,936.59	\$80.92
		50,000	\$22,236.06	\$44.47	\$31,114.20	\$62.23	\$53,350.26	\$106.70
A (Other than A-2) - TI	Tenant Improvement / Addition to a Religious Institution, Arena, Theater, etc.	300	\$3,560.38	\$160.09	\$1,912.45	\$85.99	\$5,472.83	\$246.08
		3,000	\$7,882.86	\$62.77	\$4,234.25	\$33.72	\$12,117.10	\$96.49
		30,000	\$24,830.99	\$82.77	\$13,337.88	\$44.46	\$38,168.88	\$127.23
A-2 - TI	Tenant Improvement / Addition to a Restaurant	150	\$2,733.22	\$245.80	\$1,347.66	\$121.19	\$4,080.88	\$366.99
		1,500	\$6,051.49	\$96.38	\$2,983.78	\$47.52	\$9,035.26	\$143.89
		15,000	\$19,062.19	\$127.08	\$9,398.89	\$62.66	\$28,461.08	\$189.74
TI - All Others	Tenant Improvement / Addition to any type of occupancy that does not qualify as an arena, theater, institution or restaurant.	150	\$3,031.23	\$272.60	\$1,070.09	\$96.23	\$4,101.32	\$368.83
		1,500	\$6,711.29	\$106.88	\$2,369.23	\$37.73	\$9,080.53	\$144.62
		15,000	\$21,140.58	\$140.94	\$7,463.09	\$49.75	\$28,603.66	\$190.69

**Note: Building Official and Community Development Director have the discretion to charge time and materials for any project considered outside the scope of the projects listed above.**

\*Production Homes are charged full fee for initial plan, and 25% of plan check fee for additional plans. Inspection fees are not discounted.

\*\*Foundation only is charged as 10% of the building permit fee.

\*\*\* Plan check and permit fees calculated through this study are in relation to requirements imposed by the California Building Code (CBC). The CBC dictates the types of development projects and applications, which require different permits. The plan check and inspection fees are to review those projects and applications to ensure conformance with those building code requirements.



**Exhibit A Continued -**

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED)**

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
<b>CITY CLERK</b>					
20-001	Initiative Petition Processing	A formal notice of intent to circulate an initiative petition for a municipal measure. <i>[California Election Code Section - 9202(b)]</i>		\$ 200.00	\$ 200.00
20-002	Candidate Processing	Process a candidate for office in the City not to exceed \$25. <i>[California Election Code Section - 10228]</i>		\$ 25.00	\$ 25.00
20-003	Candidate Statement	Process a candidate statement for publication electronically or in voter guide per <i>California Election Code Section 13307</i> .	Bi-Annual (10 or less)	Actual Cost	Actual Cost
20-004	Reproduction Service	Making a copy of a City document upon request. <i>[Per City Resolution 6302]</i>	Regular Copies	\$ 0.10	\$ 0.10
20-005			Election Documents	\$ 0.10	\$ 0.10
20-006	Archive Retrieval	Based upon request, retrieve an archived document per box pickup, delivery, and re-file in storage. Direct cost to cover contractor costs		Actual Cost	Actual Cost
20-007	Copy Service	Making a copy of an audiotape, CD, DVD, or PDF file.	Tape / CD / DVD / PDF	\$ 7.00	\$ 8.00
20-008	Lobbyist Registration	Process registration for lobbyist.		\$ 14.00	\$ 30.00
<b>FINANCE FEES</b>					
20-009	Return Check & Insufficient Funds Fee	Re-processing of checks or other payments due to insufficient funds. <i>[California Civil Code Section 1719]</i>	First Check	\$ 53.00	\$ 25.00
20-010			Subsequent Check	\$ 53.00	\$ 35.00
20-011	Business License Identification Decal	Issue a decal when a business license requires the use of a vehicle on request.		\$ 4.00	\$ 5.00
20-012	Custom License Listing Request	Providing a unique listing of customized business and animal licensing information.	Custom	\$ 40.00	\$ 40.00
20-013			Existing	\$ 20.00	\$ 25.00
20-014	Dog Licenses	Licensing of animals within the City Limits. - 50% discount for seniors 62+ with income under \$10,000.	Spayed / Neutered	\$ 20.00	\$ 21.00
20-015		- No Charge for handicapped, disabled or seeing eye dogs.	All Others	\$ 52.00	\$ 48.00
20-016		- Late Penalty of 20% per month not to exceed 100%.	Duplicate Tag	\$ 4.00	\$ 4.00

NOTE: ALL OTHER FEES NOT DEFINED IN THIS TABLE ARE BASED ON FULLY BURDENED RATES AND ARE EXECUTED AT THE DISCRETION OF THE CITY MANAGER

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
<b>PARKS AND RECREATION FEES (NON-PROGRAM / ACTIVITY RELATED)</b>					
20-017	<b>Banner Installation</b>	Hanging a banner across the public right-of-way at the request of a private party.	Sepulveda Blvd.	\$ 300.00	\$ 372.00
20-018			All Other	\$ 277.00	\$ 325.00
20-019	<b>Special Events Application</b>	Processing a request for a special event within the City.	Pass-through (only City access no support)	\$ 809.00	\$ 662.00
20-020			Repeat or Legacy (with no major changes)	\$ 809.00	\$ 977.00
20-021			New (or with major changes)	\$ 809.00	\$ 1,417.00
20-022	<b>Film Permits - Application</b>	Review an application for a motion picture or still photography, which takes place in the City.	Motion Picture	\$ 489.00	\$ 528.00
20-023			Still Photography	\$ 178.00	\$ 208.00
<b>POLICE FEES</b>					
20-024	<b>Amplified Sound Permit</b>	Reviewing a Request to use amplified sound in a non-commercial area.		\$ 227.00	\$ 183.00
20-025	<b>Retail Firearm Permit</b>	Review of a request to sell firearms within the City	New	\$ 1,012.00	\$ 944.00
20-026		Renewal of a request to sell firearms within the City.	Renewal	\$ 234.00	\$ 242.00
20-027	<b>Block Party Permit</b>	Review an application for a block party.		\$ 50.00	\$ 50.00
20-028	<b>Weapons Discharge Permit</b>	Review an application for a weapons discharge permit within the City.		\$ 601.00	\$ 603.00
<b>COMMUNITY AFFAIRS</b>					
20-029	<b>Alarm System Permit</b>	Registration of new property alarms within the City.	New	\$ 55.00	\$ 57.00
20-030		Annual renewal of Alarm System Permits already registered within the City.	Renewal	\$ 25.00	\$ 29.00
20-031	<b>Alarm School</b>	As-needed class providing education and best practices for alarm system users who have had "false alarm" incidents. Completion forgives one invoice per year		\$ 64.00	\$ 91.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
	<b>TECHNICAL SUPPORT</b>				
20-032	<b>Fingerprint Card / Live Scan</b>	Fingerprint a person on a card or process a live scan fingerprint. This is the City's charge in addition to any DOJ fees.		\$ 19.00	\$ 23.00
20-033	<b>Digital Reproduction</b>	Providing a Police audio recording upon request.	Audio	\$ 58.00	\$ 96.00
20-034		Providing a police video recording upon request.	Video	\$ 131.00	\$ 213.00
20-035	<b>Police Record Clearance Letter</b>	Research and prepare clearance letter for individuals requesting the service.		\$ 43.00	\$ 56.00
20-036	<b>Police Photos - Film &amp; Digital</b>	Providing copies of police photographs on request.	Per Photo / Page	\$ 5.00	\$ 6.00
20-037		Providing copies of police photographs on a CD upon request.	Per CD	\$ 9.00	\$ 13.00
20-038	<b>Data Research and Release</b>	Research and compilation of data in police records upon request.		\$ 105.00	\$ 119.00
20-039	<b>Special Business - DOJ Check</b>	Processing an individual who is involved in the operation of certain special businesses, which involves checking that individual against the DOJ's records.		\$ 913.00	\$ 1,159.00
20-040	<b>Police Reports</b>	Producing a copy of a police report upon request. <i>[Per City Resolution 6302]</i>	Per Page	\$ 0.10	\$ 0.10
	<b>JAIL OPERATIONS</b>				
20-041	<b>Booking Fee</b>	Process an individual under arrest for booking. *Plus additional County Fees		\$ 259.00	\$ 266.00
	<b>PARKING</b>				
20-042	<b>Impound Vehicle Release</b>	Collection and release of vehicles impounded by the City.	Lot Release (at tow-yard)	\$ 118.00	\$ 137.00
20-043		Collection and field release of vehicles impounded by the City.	Field Release (on-street)	\$ 47.00	\$ 54.00
20-044	<b>Vehicle Inspection / Correction</b>	Inspect vehicle and sign-off citation for correctable violation.		\$ 26.00	\$ 27.00
20-045	<b>Boot Removal</b>	Installation and removal of a parking boot, due to non-payment of 5 or more parking citations.		\$ 109.00	\$ 183.00
20-046	<b>Handicap Violation Waiver Admin Fee</b>	Processing of repeated handicap violation waivers for citations issued to individuals with a handicapped placard. <i>No charge for the first waiver.</i>		\$ 25.00	\$ 32.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
<b>ANIMAL SERVICES</b>					
20-047	Animal Relinquishment	Pick up of dead animals for relinquishment on request.	Dead	\$ 107.00	\$ 118.00
20-048		Pick up of live animals for relinquishment on request.	Live Animal	\$ 213.00	\$ 236.00
20-049	Animal Quarantine Inspection	Inspection of a home and re-checks when an animal is required to be quarantined.		\$ 267.00	\$ 295.00
<b>FIRE</b>					
20-050	Fire Code Annual Permits / State Mandated Fire Inspections	Review, inspect and issue an annual permit based on the business operation as defined by the California Fire Code, Section 105.6, and occupancy classifications as determined by the California State Fire Marshal	<b>Operational &amp; State Mandated</b>		
20-051			0-2,000 SF	\$ 223.00	\$ 232.00
20-052			2,000-10,000 SF	\$ 223.00	\$ 349.00
20-053			10,000+ SF	\$ 223.00	\$ 465.00
			Complex Building	<b>Actual Cost</b>	<b>Actual Cost</b>
			<b>Multi-Family Dwelling Units</b>		
20-054			3-10 units	\$ -	\$ 232.00
20-055			11-20 units	\$ -	\$ 349.00
20-056			20+ units	\$ -	\$ 465.00
20-057			High Rise	\$ 782.00	\$ 813.00
20-058		Issue a fire code permit for a soundstage involving a major review and inspection. (Per Soundstage) <i>[Current fees collected by agreement.]</i>	Soundstage	\$ 6,667.00	\$ 6,667.00
20-059	Fire, Temporary Permit	Review, inspect, and issue a permit for an event that will have one or more operational permits as defined by the California Fire Code, Section 105.6	Minor Event	\$ 279.00	\$ 290.00
20-060		Review, inspect and issue a permit for an event that consumes the time and resources of the fire department, based on the judgement of the Fire Marshal	Major Event	\$ 476.00	\$ 560.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-061	<b>Fire, Temporary Permit</b>	Review, inspect and issue a permit for an individual operation under the California Fire Code, Section 105.6 with specific start and end times	One Time Permit	\$ 279.00	\$ 290.00
20-062		A temporary permit may require a Fire Safety Officer to stand by during the course of the permit, as determined by the Fire Marshal. Staffing by the Fire Department for a major event	City Staff support Costs at Fully Burdened Rate/hour	Actual Cost	Actual Cost
20-063	<b>Fire Re-Inspection</b>	Reinspection of an Annual Business Inspection or Temporary Permit **Per hour <del>**No charge for first two inspections-</del>		\$ 223.00	\$ 232.00
20-064	<b>Fire Annual Business Inspection</b>	Providing an annual fire and life safety inspection of a business with the City.  <del>**No Charge for first two inspections</del>	0-2,000 SF	\$ 276.00	\$ 220.00
20-065			2,000-10,000 SF	\$ 404.00	\$ 335.00
20-066			10,000+ SF	\$ 828.00	\$ 451.00
20-067			Complex Building	Actual Cost	Actual Cost
20-068	<b>Fire Residential Sprinkler</b>	Review a plan and inspect a residential fire sprinkler system for conformity with fire code requirements.	Plan Check	\$ 164.00	\$ 482.00
20-069			Inspection	\$ 220.00	\$ 307.00
20-070	<b>Fire Commercial Sprinkler</b>	Review a plan and inspect a commercial fire sprinkler system for conformity with fire code requirements.	Plan Check	\$ 288.00	\$ 482.00
20-071			<b>Inspection:</b> 1-50 heads	\$ 276.00	\$ 365.00
20-072			51-100 heads	\$ 499.00	\$ 597.00
20-073			101+ heads	\$ 723.00	\$ 829.00
20-074	<b>Fire Alarm System</b>	Review a plan and inspect a fire alarm system for conformity with fire code requirements.	Plan Check	\$ 220.00	\$ 482.00
20-075			<b>Inspection:</b> 0-2,000 SF	\$ 220.00	\$ 307.00
20-076			2,000-10,000 SF	\$ 332.00	\$ 423.00
20-077			10,000+ SF	\$ 555.00	\$ 655.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-078	Fire Protection System	Review a plan and inspect a fire protection system for conformity with fire code requirements, including items such as Hood / Suppression, Medical Gas System, Underground Fire Service Line, Underground Storage Tank, Above Ground Storage Tank, Private Fire Hydrant, etc.	Plan Check	\$ 276.00	\$ 504.00
20-079			Inspection	\$ 443.00	\$ 539.00
20-080	Fire Solar System - Variance Review	Review of solar system for variance from fire code. Variance may not be granted. Cost applies regardless of outcome	Per review request	\$ -	\$ 140.00
20-081	Fire Expedited Review	Request to process plan check in an expedited manner (includes 2 rechecks).	Per request	\$ -	\$ 687.00
20-082	Fire Revision	Revision after a permit has been issued.	Revision - per revision	Actual Cost	Actual Cost
20-083	Ambulance Transport	Ambulance transport with advanced life support. <i>[Per Resolution 6262]</i>	ALS	Current LA County Rate	
20-084		Ambulance transport with basic life support. <i>[Per Resolution 6262]</i>	BLS (Service provided by McCormick Ambulance)	Current LA County Rate	
<b>PUBLIC WORKS FEES</b>					
	<b>ADMINISTRATIVE</b>				
20-319	Barricade Rental	Assist residents with the daily rental of barricades without and with flasher, 8ft. In length, delineators, 18 inch cones and temporary no parking cardboard signs for block parties. This permit includes two 8' Street Closure Barricades.	Block Party Package	\$ 26.00	\$ 36.00
20-320		Assist residents with the daily rental of delineators, 18 inch cones and temporary no parking cardboard signs for moving purposes.	Moving Package - Standard	\$ 30.00	\$ 40.00

**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-321	Barricade Rental (Cont.,)	*Includes the price of the delineators and signs.	Moving Package - Deluxe	\$ 45.00	\$ 51.00
<b>CIVIL ENGINEERING</b>					
20-322	Final Tract Map Review	Reviewing the final tract map to determine extent to which it complies with appropriate code requirements. <b>**Map Copy Deposit of \$500</b>	Application	\$ 748.00	\$ 852.00
20-323	New / Relocate Utility Pole	Review a request for a new or relocated utility pole.	Standard	\$ 2,091.00	\$ 2,397.00
20-324		Review a request for a new or relocated utility pole requiring PPIC review.	PPIC Review	\$ 2,614.00	\$ 3,001.00
20-325	Online Bid and Proposal Service Fee for Capital Projects and (Public Construction)	Service fee associated with setting up, loading digital plans, specifications and other bidding documents on-line to facilitate bid submittal online by contractors.	Simple Projects (Under \$100k)	\$ -	\$ 60.00
20-326			Moderately Complex Projects (\$100k-\$500k)	\$ -	\$ 81.00
20-327			Complex Projects (Greater than \$500k)	\$ -	\$ 100.00
<b>TREES</b>					
20-328	Tree Permit - Private Property	Remove, replace, or protect a tree on private property under the terms of the Tree Ordinance.	Dead / Dying Tree	\$ 322.00	\$ 100.00
20-329			Removal / Replacement	\$ 481.00	\$ 100.00
20-330			Protection	\$ 352.00	\$ 100.00
20-331			Removal in Public Right-of-Way	\$ 210.00	\$ 100.00
20-332	Tree Trimming Permit	Review and inspect tree trimming request.	Private Property	\$ 65.00	\$ 83.00
20-333			In Public ROW	\$ 65.00	\$ 138.00
<b>UTILITIES</b>					
20-334	Commercial SUSMP Review	Review of a commercial stormwater mitigation plan for compliance with national and local stormwater standards.		\$ 776.00	\$ 846.00
20-335	Temporary Water Meter Rental	Install or move a temporary 3" fire hydrant meter at a construction site. <b>**Meter deposit of \$1,500 required.</b>	Installation	\$ 97.00	\$ 241.00
20-336			Move	\$ 77.00	\$ 145.00



**CITYWIDE USER FEE SCHEDULE (NON - COMMUNITY DEVELOPMENT RELATED) - ADOPTED FEBRUARY 18, 2020**

<b>FIRE</b>	<b>Category</b>	<b>Description</b>	<b>Additional Information</b>	<b>Current Fee</b>	<b>ADOPTED FEE EFFECTIVE MARCH 18, 2020</b>
20-337	<b>Water Meter Test</b>	Field or bench calibration of a water meter upon a request by a resident or business.	5/8' - 1" meter	\$ 250.00	\$ 355.00
20-338		**Charges are refundable if meter is running fast.	1.5"+ meter	\$ 327.00	\$ 433.00
20-339	<b>Water Service Turn-On</b>	Turning on water service after water service has been turned off to a residence or business for contractor to work on water system or for non-payment of water bill. **\$15 collection for payment in the field.	Monday - Thursday 8:00 am - 4:30 pm	\$ 47.00	\$ 154.00
20-340		***5% Penalty on unpaid water bills (per Resolution 5726).	Afterhours, weekends, or holidays	\$ 218.00	\$ 369.00
20-341	<b>Water Meter Installation Inspection</b>	Installation of new water meter upon request	3/4" - 1" meter	\$ 71.00	\$ 96.00
20-342		**Material costs not included	1" - 2" meter	\$ 122.00	\$ 164.00
20-343			Greater than 2" meter	<b>Actual Cost</b>	<b>Actual Cost</b>
20-344	<b>F.O.G. &amp; Clean Bay Restaurant Inspections</b>	Annual inspection of kitchen equipment/fixtures and Best Management Practices for compliance with stormwater and wastewater regulation compliance.	Initial Inspection	\$ 200.00	\$ 193.00
20-345			Follow-up Inspection	\$ 109.00	\$ 139.00
20-346	<b>Clean Bay Restaurant Inspection for Stormwater Permit Compliance</b>	Annual inspection of kitchen equipment / fixtures and best management practices for compliance with stormwater regulation compliance. **Plus additional County Fees		\$ 204.00	\$ 221.00
20-347	<b>Waste Management Plan</b>	Review & processing of the plan and weight tickets for any demolition or remodel over \$100,000 in value for its waste management impact.		\$ 252.00	\$ 280.00

# Appendix D: Affirmatively Furthering Fair Housing

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# 1 Introduction

Fair housing occurs when individuals of similar income levels in the same housing market have the same range of housing choice available to them regardless of their characteristics as protected under local, State, and Federal laws. Fair housing choice occurs when citizens pursuing housing options are free from discrimination on the basis of race/ethnicity, religion, sex, marital status, ancestry, national origin, color, familial status, or disability—hereinafter referred to as “protected characteristics”—by the California Fair Employment and Housing Act, California Government Code Section 65008, and other State and Federal fair housing and planning laws. In 2018, Assembly Bill 686, Housing Discrimination: Affirmatively Further Fair Housing, amended Sections 65583 and 65582.2 of the California Government Code to require a public agency to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing.

From freeway expansion to discriminatory housing loan practices, historically underserved communities across the nation have experienced decades of housing disinvestment and infrastructure underinvestment, leaving many communities with higher rates of air pollution, poverty, unemployment, educational attainment, and health risks.<sup>1</sup> State and Federal laws, such as the Fair Housing Act, have established pathways for local jurisdictions to create more diverse and equitable communities, but reversing decades of discriminatory policies at all levels of the public and private sectors is complex, and many challenges to equitable development remain. The General Plan Housing Element must affirmatively further fair housing by first identifying segregated living patterns and barriers to fair housing, then identifying potential sites for affordable housing in areas of opportunity and implementing programs that aim to replace segregated living patterns and transform racially and ethnically concentrated areas of poverty. Ensuring that sites for housing, particularly units available for lower-income households, are located in high-resource areas, rather than concentrated in areas of high segregation and poverty, requires jurisdictions to plan for housing with regards to the accessibility of various opportunities, including jobs, transportation, good education, and health services.

This appendix serves as an assessment of fair housing practices pursuant to California Government Code Section 65583(c)(10) in the City of Manhattan Beach (City). Housing Elements are required to include the following:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction’s fair housing enforcement and outreach capacity.
- An analysis of available Federal, State, and local data and knowledge to identify integration and segregation patterns and trends; racially or ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs within the jurisdiction, including displacement risk.
- An assessment of the factors that contribute to the fair housing issues identified in the analysis.

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<sup>1</sup> Affirmatively Furthering Fair Housing, April 2021. California Department of Housing and Community Development.

- An identification of the jurisdiction’s fair housing priorities and goals, giving highest priority to the greatest contributing factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.
- Measurable strategies and actions to implement the fair housing priorities and goals in the form of programs to affirmatively further fair housing.

## 2 Regional Analysis of Impediments

The City is committed to affirmatively furthering fair housing choice and promoting equal housing opportunity in accordance with the requirements of Federal and State fair housing law. To achieve this, the City participates in the regional Analysis of Impediments to Fair Housing Choice for the Community Development Commission and the Housing Authority of the County of Los Angeles (HACoLA), and works to remove these impediments. The Analysis of Impediments identifies impediments to fair housing choice, contributing factors, and goals for overcoming the barriers that have been identified as contributing to fair housing issues pertaining specifically to the “Urban County” and the areas served by the HACoLA (“service area”).<sup>2</sup> These impediments are in relation to the following fair housing issues:

- Segregation and integration
- Racially or ethnically concentrated areas of poverty
- Disparities in access to opportunity
- Disproportionate housing needs
- Discrimination or violations of civil rights laws or regulations related to housing

Relevant portions of the regional Analysis of Impediments have been incorporated into this assessment of fair housing for the City’s General Plan Housing Element to complement the analysis, and identify contributing factors, strategies, and actions, where applicable.

## 3 Housing Element Outreach

The City has been able to enhance the types and levels of community engagement due to significant strides in technology in recent years. Past engagement may have had fewer forms of media, meaning that public meetings were the primary media, with surveys and stakeholder interviews and other types of engagement taking a secondary role. Public meetings may have occurred during only one specific time and offered in a language not understood by a significant portion of the community, resulting in people unable to attend and/or participate. Virtual meetings could also be inaccessible if individuals did not have reliable internet.

Engagement related to the Housing Element has attempted to be comprehensive while in the context of the COVID-19 pandemic. Community engagement and outreach has been solely done in English, because the majority of the population (98 percent per 2019 Census data) comes from an English-only-speaking household, or speak English “very well.” Opportunities for public participation are typically advertised in

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<sup>2</sup> [http://web.mit.edu/afs/athena.mit.edu/org/f/fairhousing/plans/CA\\_LACounty\\_AI\\_volume-i.pdf](http://web.mit.edu/afs/athena.mit.edu/org/f/fairhousing/plans/CA_LACounty_AI_volume-i.pdf).

two local newspapers that are popular and well-read, in addition to advertising the events on the City's social media platforms and City website. Please refer to **Appendix F, Community Engagement Summary**, for a full summary of outreach materials and outreach conducted as part of the Housing Element update.

## 4 Assessment of Fair Housing

### 4.1 Fair Housing Enforcement and Outreach

This section provides information on the organizations that provide fair housing services to providers and consumers of housing, as well as the nature and extent of fair housing complaints received by the fair housing provider within the service area.

Fair housing services available in the service area include outreach and education, complaint intake, and testing and enforcement activities. Organizations that provide fair housing services include the following:

- U.S. Department of Housing and Urban Development (HUD)
- California Department of Fair Employment and Housing
- Housing Rights Center (HRC)
- Housing Authority of the County of Los Angeles (HACoLA)
- Fair Housing Council of Orange County

The City contracts with the HRC for fair housing and mediation services, and provides fair housing information and referrals upon request. The HRC, which primarily operates in Los Angeles County, receives multi-year grants from HUD to conduct testing in areas where statistics point to discrimination, specifically, persistent housing discrimination based on race, national origin, familial status, and disability. The organization also provides resolution for housing discrimination, including mediation and litigation services. HACoLA provides online resources on its website, such as links to various organizations, including HUD, HRC, and advocacy groups, as well as relevant policy documents.

For the region Los Angeles–Long Beach–Anaheim, the Fair Housing Council of Orange County provides similar services to HACoLA's, and additionally provides low-cost advocacy, mediation, individual counseling, and comprehensive community education.

#### 4.1.1 Findings, Lawsuits, Enforcement Actions, Settlements, or Judgments Related to Fair Housing or Civil Rights

Data collected from 2008 through 2016 shows that the most common basis for complaints in the service area were for disability, familial status, and race, according to the Regional Analysis of Impediments. Of the 2,610 complaints logged from 2008 to 2016, 57 percent were determined to have no cause and 21.6 percent were deemed successfully settled. In recent history, the City has not been involved in any lawsuits related to fair housing, and the City has no ongoing litigation in terms of housing rights or civil rights violations. According to HUD's Office of Fair Housing and Equal Opportunity, from 2013 through 2021, there were seven inquiries in the City. Of the seven inquiries, two were related to familial status and five

were documented as “none.” The inquiries filed were determined have “no valid basis” or “failure to respond.”

The HRC provides the City with quarterly reports of direct services, discrimination inquiries and cases, tenant and rental-owner services, and demographics reporting for the fiscal year (July through June). An average of 12 persons were provided services related to general housing and discrimination from the July 2014 to June 2015 fiscal year through the July 2020 to June 2021 fiscal year. Over the last seven fiscal years, the median number of discrimination cases reported was one. Tenant and rental-owner services provided in the City over the last 7 years were related to late fees, lease terms, substandard housing conditions,<sup>3</sup> security deposits, and other issues. Approximately 78 percent of callers or persons seeking services from the HRC were in-place tenants, and 15 percent were rental owners or management companies. Similar to cases reported in the Regional Analysis of Impediments, the most common complaint in the City was for issues related to accommodations for people with physical and mental disabilities. The City has been successful in addressing general housing and discrimination issues, as 56 percent of reported inquiries were resolved; 20 percent were addressed through mediation and legal aid provided by the HRC; and other cases related to substandard housing conditions were addressed by the City’s Building and Safety and Code Enforcement Departments, and the County of Los Angeles Department of Public Health.

#### 4.1.2 Compliance with Fair Housing Laws

The City is compliant with State fair housing laws, and administers programs and activities relating to housing and community development in a manner to affirmatively further fair housing, including the State’s Density Bonus Law (California Government Code Sections 65915–65918), Housing Element laws, the definition of family, the California Employee Housing Act, and Reasonable Accommodation Procedures. Local fair housing law implemented by the City includes procedures and standards set forth under Section 10.88.070 of the Manhattan Beach Municipal Code for the conversion of existing multifamily rental housing to condominiums. Such conversions may significantly affect the balance between rental and ownership housing within the City, such as reducing the variety of individual choices of tenure, type, price, and location of housing; increasing overall rents; decreasing the supply of rental housing for all income groups; and displacing individuals and families. As such, the City sets forth requirements, including tenant notification, notification of a right to purchase, tenant purchase discounts, and relocation expenses. Special provision is also made for lifetime leases for non-purchasing older adult tenants or tenants with a medical disability. In addition, low- and moderate-income tenants and those with children are provided with an extended relocation period. In evaluating requests for condominium conversions, the City’s Planning Commission must consider the impact of tenant displacement, with emphasis on existing low- and moderate-income tenants.

#### 4.1.3 Other Resources

The following resources are available to the City’s residents:

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<sup>3</sup> “Substandard housing” problems/conditions as defined by the U.S. Census include households without hot and cold piped water, a flush toilet, and/or a bathtub or shower, and/or households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

**Stay Housed LA County:** The COVID-19 pandemic has cost people their jobs and livelihoods. This has left an estimated one-third of households in Los Angeles County unable to make rent and facing losing their homes. In response, Stay Housed LA County is a tenant assistance program that provides free legal services to tenants facing eviction during the COVID-19 public health crisis.

**CA COVID-19 Rent Relief – Housing Is Key:** This program helps income-eligible households pay rent and utilities for past-due and future payments. The Federal Consolidated Appropriations Act of 2021 provides funding to support the program and tenant (renter) protection laws signed by Governor Newsom.

**Los Angeles County Mortgage Relief Program:** This County of Los Angeles (County) program includes a relief fund that provides grants of up to \$20,000 for qualified property owners, plus expanded foreclosure prevention counseling services.

**Housing Rights Center:** Housing counselors are available to answer questions about tenant/rental-owner rights and obligations, including topics like security deposits, evictions, repairs, rent increases, harassment, and more. Conversations with housing counselors are confidential, and can help residents find the resources they need.

## 4.2 Segregation and Integration

Patterns of segregation have been commonly linked to poorer life outcomes related to income, housing equity, educational attainment, and life expectancy, according to research from the University of California, Berkeley (UC Berkeley).<sup>4</sup> Affirmatively Furthering Fair Housing (AFFH) involves overcoming patterns of segregation to foster inclusive communities. This section will analyze segregation and integration patterns in the City relating to race and ethnicity, household income, familial status, persons with disabilities, and neighborhood segregation using the AFFH Data and Mapping Resources from the California Department of Housing and Community Development (HCD).

### 4.2.1 City Boundary and Geography

The City is located within the southwestern coastal portion of Los Angeles County in what is commonly referred to locally as the “South Bay” area. The City is generally bound by Rosecrans Avenue to the north, Aviation Boulevard to the east, Artesia Boulevard to south, and the Pacific Ocean to the west. Abutting cities are the City of El Segundo to the north, City of Hawthorne and portions of the City of Redondo Beach to the east, and portions of City of Redondo Beach and City of Hermosa Beach to the south. **Figure 1, City Map**, provides an overview of the City’s planning areas that reflect the City’s unique and varied environment. For a description of the distinct planning areas, refer to **Appendix B, Needs Assessment**. Major thoroughfares running east/west in the City include Rosecrans Avenue, Marine Avenue, Manhattan Beach Boulevard—which also serves as a dividing street between the City’s northern and southern areas—and Artesia Boulevard. Major thoroughfares running north/south in the City include Highland Avenue, Sepulveda Boulevard—which also serves as a dividing street between the City’s eastern and western areas—and Aviation Boulevard.

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<sup>4</sup> Menedian, S., and S. Gambhir. 2018. “Racial Segregation in the San Francisco Bay Area.” Othering & Belonging Institute, UC Berkeley. <https://belonging.berkeley.edu/study-finds-strong-correlations-between-segregation-and-life-outcomes-sf-bay-area>.





Figure 1. City Map

## 4.2.2 Race and Ethnicity

The population within the City is primarily White. Approximately 73 percent of City residents are non-Hispanic White. The percentage of ~~Hispanics~~ Hispanic people residing in the City is 8 percent. The Asian population, at 13 percent, represents the largest non-Hispanic minority.

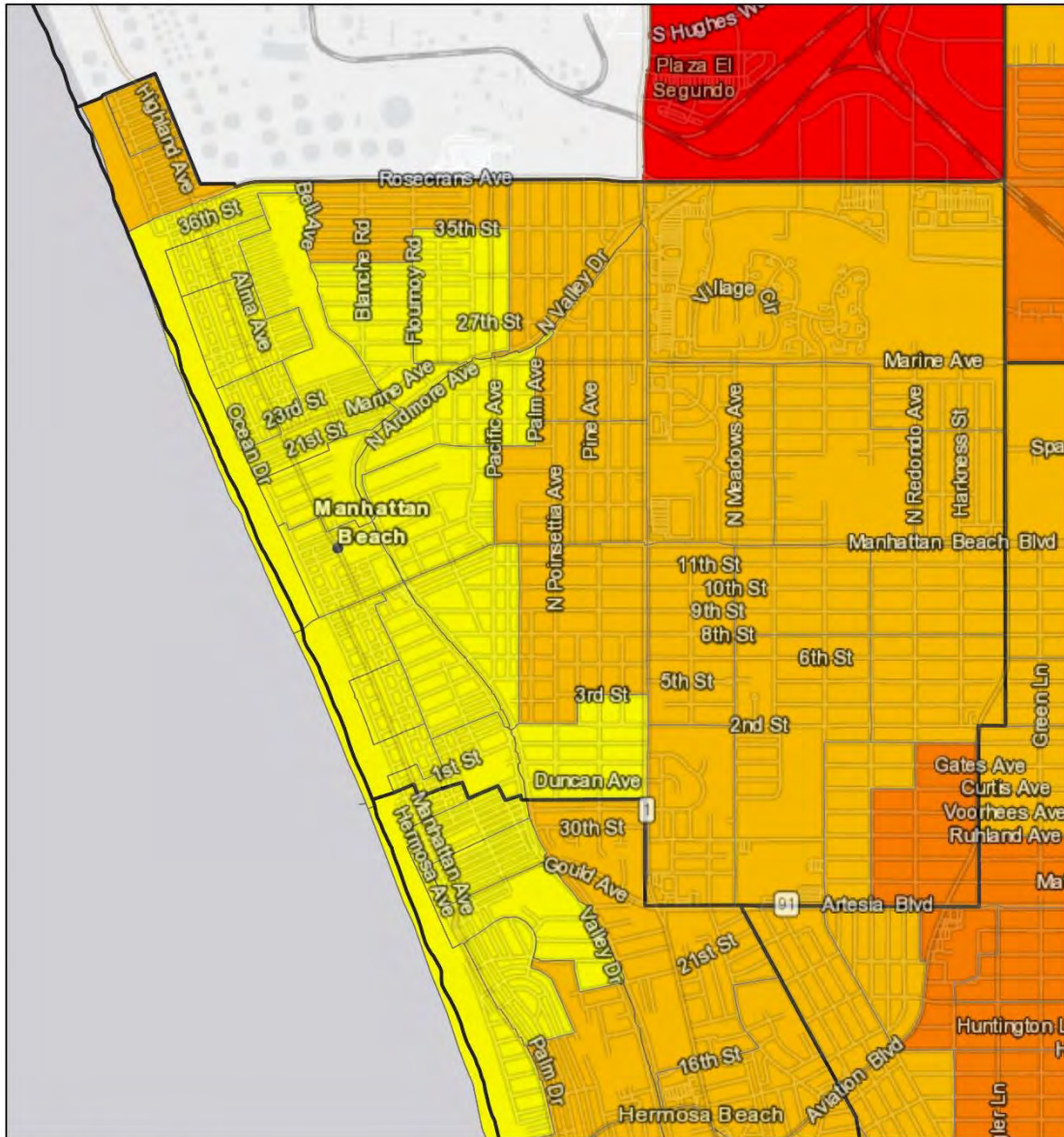
~~As shown in Figure 2, City Racial Demographics (20158), shows the percent of the total non-White population by Census block group.~~ Census block groups east of Pacific Avenue make up 21 percent to 40 percent of the total non-White population in the City. Block groups west of Pacific Avenue make up a non-White population of less than or equal to 20 percent. One block group in the southeast corner of the City, along Artesia Boulevard, makes up a higher percentage of non-White population (41 percent to 60 percent). ~~As compared to Figure 3, City Racial Demographics (2010), which illustrates the percent of the total non-White population by Census block in 2010, patterns over time show that the non-White population of the City increased significantly by 2018. Previously in 2010, more than half of the Census block in the City made up less than 20 percent of the total non-White population in the City and by 2018 block groups in the eastern and southeastern part of the City make up 21 percent to 40 percent of the total non-White population in the City. This indicates shows a a-patternss over time where previously majority-White neighborhoods will-arehave becoming increasingly non-White.~~ At a regional scale, including the South Bay and some Gateway Cities<sup>5</sup> areas, the City is among the areas with the lower population of non-White persons, as shown in **Figure 43, Regional Racial Demographics**. ~~This may indicate a regional influence on the City in regards to changing demographics.~~

Generally, the average racial composition and number of people of different races or ethnicities in neighborhoods differs depending on location. To further examine this, this assessment relies on a calculation of the diversity index, which summarizes racial and ethnic diversity. The diversity index shows the likelihood that two persons, chosen at random from the same area, belong to different race or ethnic groups. Diversity index data is available at the block group level and ranges from 0 (no diversity) to 100 (complete diversity). **Figure 54, Diversity Index**, indicates that the City has low diversity, and particularly lower diversity on the western side (west of Sepulveda Boulevard), and moderate (40–55, 55–70) diversity index scores east of Sepulveda Boulevard and in the southeast corner of the City. At a regional scale, other South Bay cities east of the City have higher diversity, with block groups scoring a diversity index of greater than 85.

For regional assessments, areas with a shade of light gray indicate no data is available. The area shaded light gray north of the City, outside of City boundaries, in **Figures 2 and 43**, is the location of the Chevron refinery.

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<sup>5</sup> "Gateway Cities" locally refers to a crescent of land along the southeast edge of Los Angeles County, bordering nearby Orange County, that encompasses 27 cities, including Compton, Long Beach, South Gate, and Lynwood. For a full list of cities, see Los Angeles County Economic Development Corporation at <https://laedc.org/wtc/chooselacounty/regions-of-la-county/gateway-cities/>.



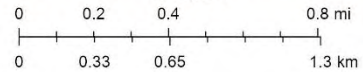
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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group

- ≤ 20%
- 21 - 40%
- 41 - 60%
- > 81%

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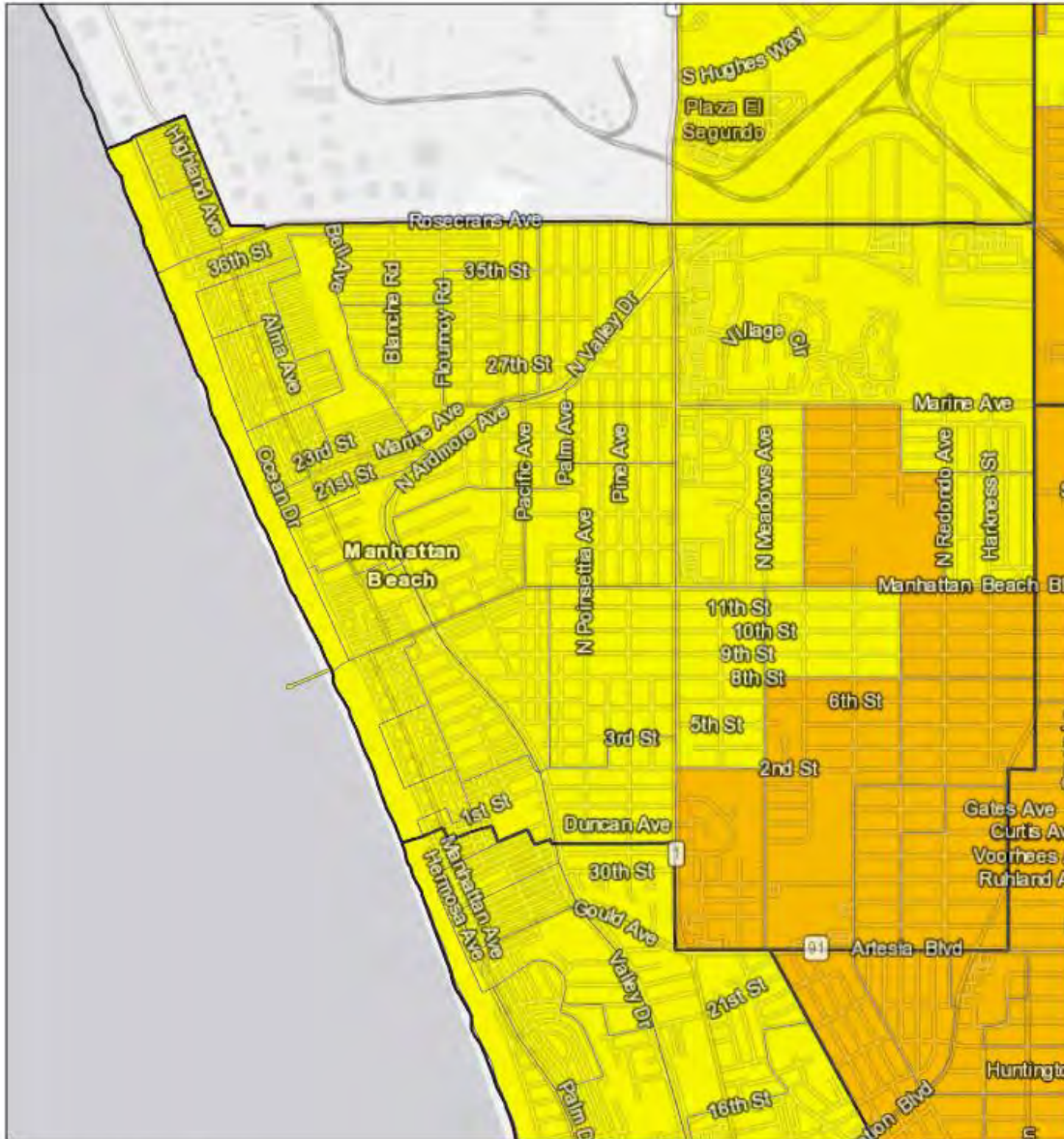


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CA HCD

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Figure 2. City Racial Demographics (2018)



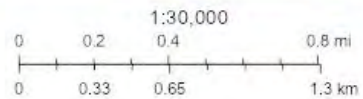
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City/Town Boundaries

(A) Racial Demographics (2010) - Block Group

≤20%

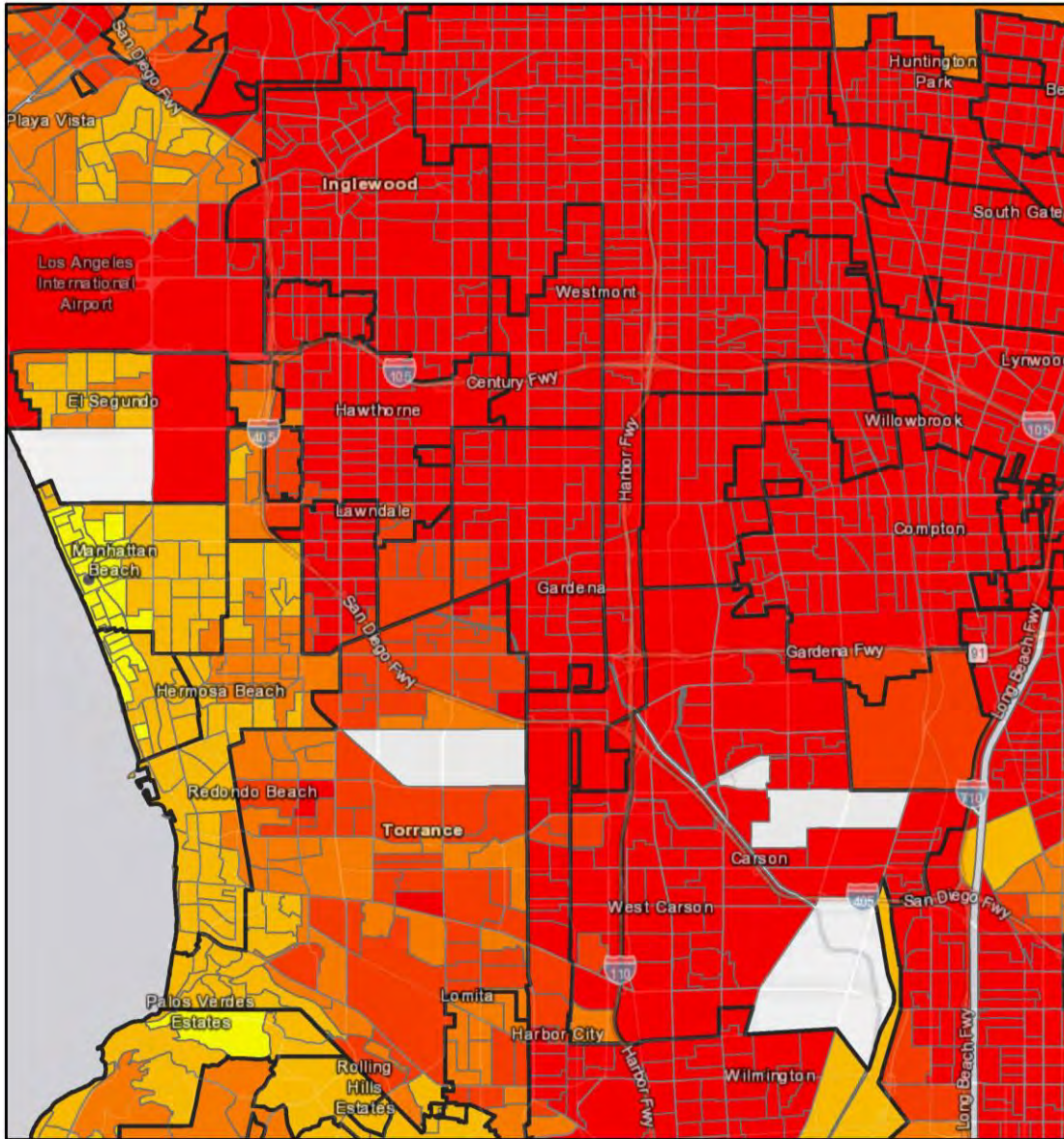
21 - 40%



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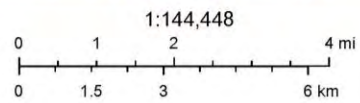
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Figure 3. City Racial Demographics (2010)



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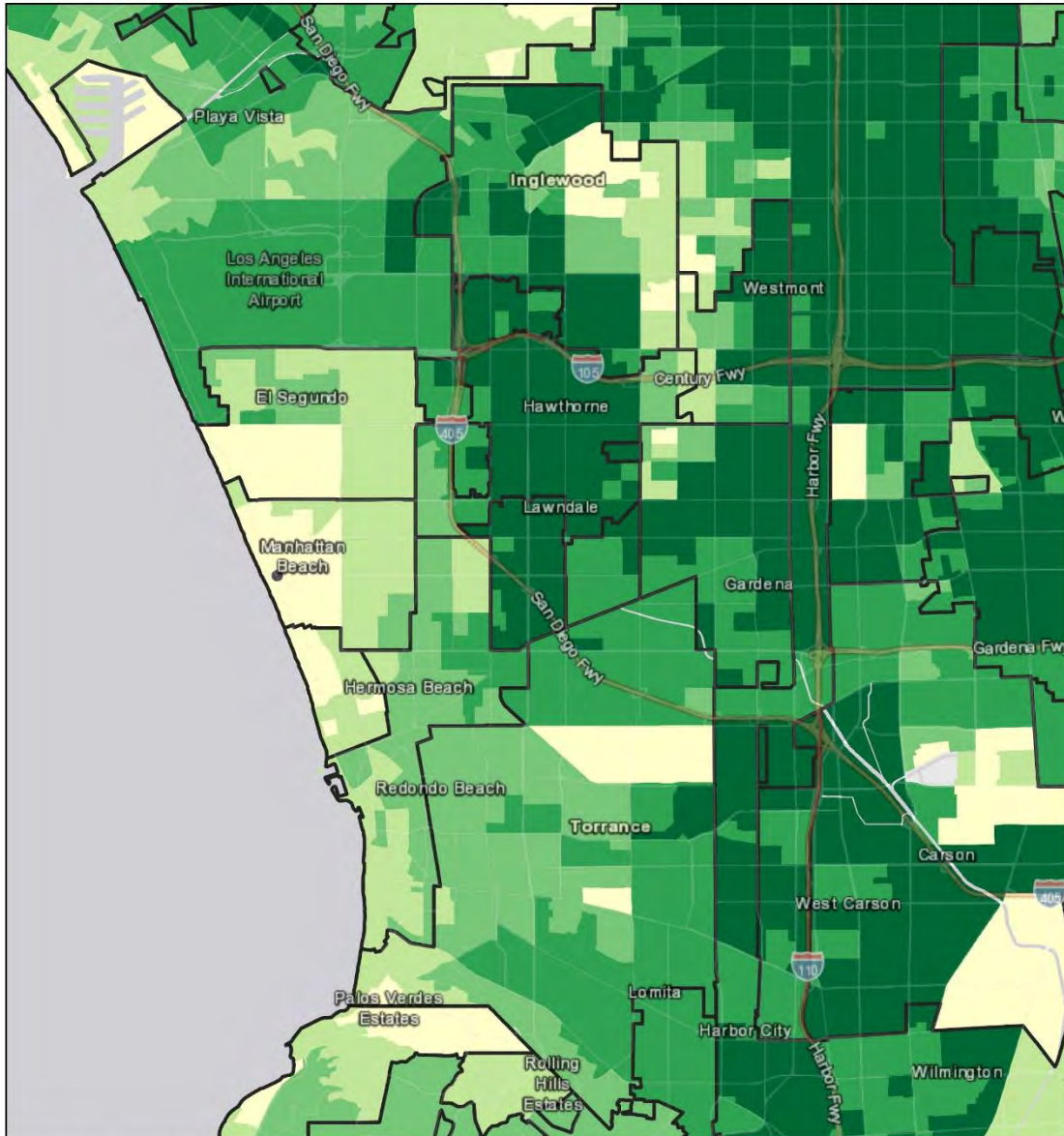
- City/Town Boundaries
- (R) Racial Demographics (2018) - Block Group
- ≤ 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 81%



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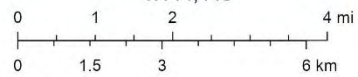
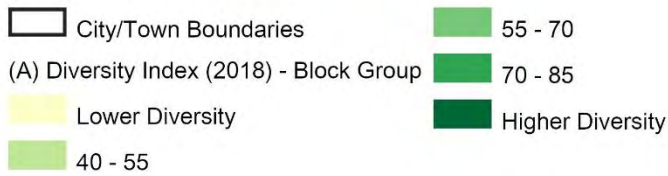
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Figure 43. Regional Racial Demographics



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CA HCD

Figure 54. Diversity Index

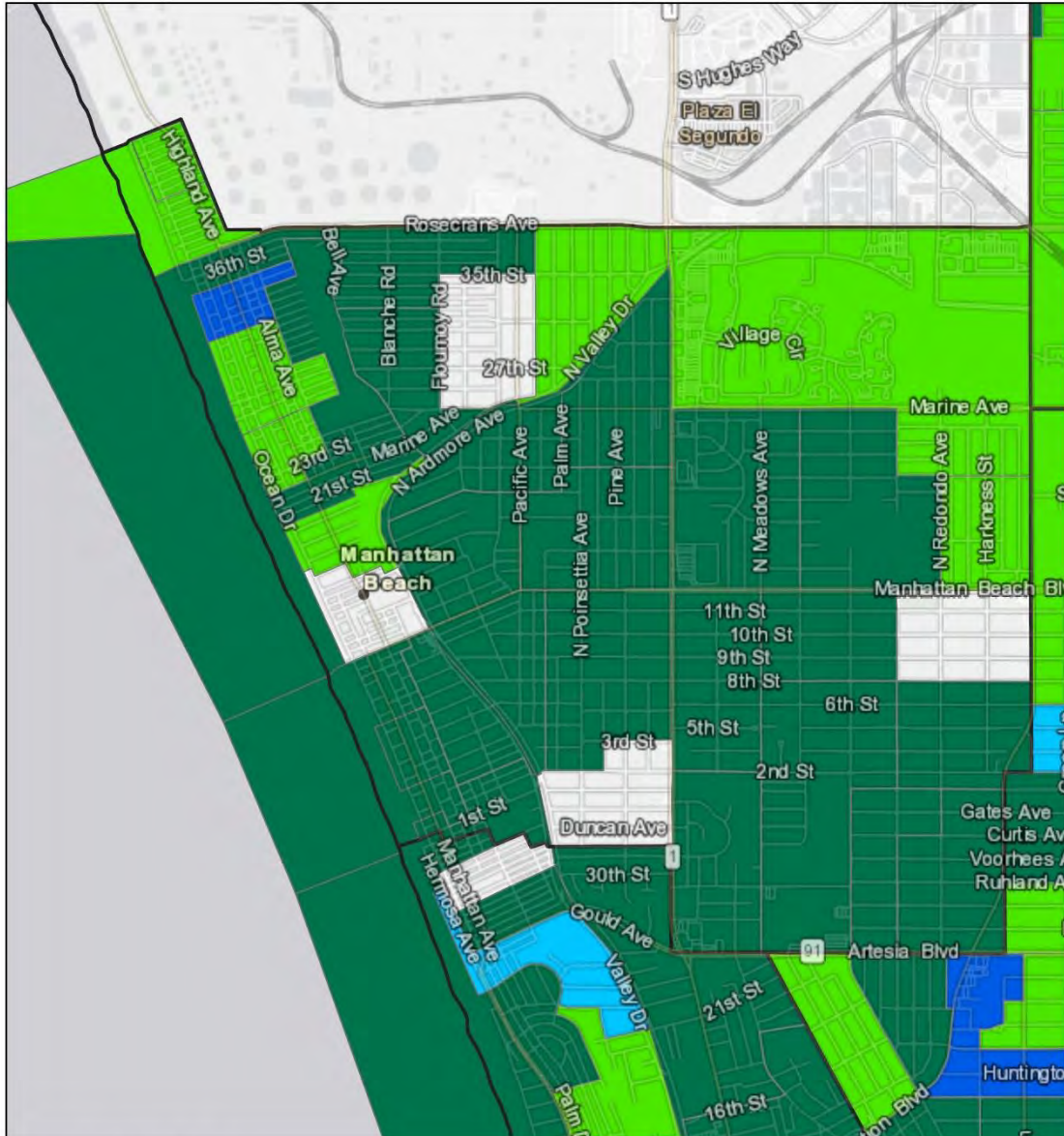
### 4.2.3 Household Income

Discriminatory housing practices of the past, such as redlining, restrictive zoning, urban renewal, and steering, while illegal today, have led to a disproportionate gap in household wealth based on race and ethnicity, especially between Black and White households.<sup>6</sup> Fair housing choice can be impacted by relationships among household income, household type, race/ethnicity, and other factors that create misconceptions, biases, and differential treatments. Because household income is also one of the most important factors for determining a household's ability to balance housing costs with other basic life necessities, this section will analyze median household income and identify any patterns of income and racial segregation at the local and regional levels.

**Figure 65, City Median Income (2015-2019)**, shows the varying median income levels in the City, and indicates that most households have a median income greater than the 2020 State median income of \$87,100. As a point of comparison, the City's median household income is \$153,023, and the County median household income is \$68,004. Households with median incomes greater than \$125,000 are located throughout the City, but make up the majority in the central and southern areas of the City. Households with a median income of less than \$125,000 but greater than \$87,100 are located in the northern areas of the City. One block group in the northwest corner of the City, near Highland Avenue and 36th Street, indicates a median income of less than \$87,100 but greater than \$55,000. When compared to the previous five years as shown in Figure 7, City Median Income (2010-2014), household median income throughout the City has generally been greater than \$100,000, indicating little change over time. However, the household median income has been decreasing to less than the 2020 State median income in small pockets of neighboring cities. This may be caused by the changing household demographics in neighboring cities in the past five years. Although there are no major local patterns of income segregation, the City has a high number of moderate- to above moderate-income households when compared to the South Bay and Gateway Cities areas, as shown in **Figure 86, Regional Median Income**. **Figure 86** indicates a clear separation of income groups between the coastal and relative inland cities. East of the City, cities such as Lawndale and Torrance have a mix of incomes and a greater population of lower-income households. At a regional level, there is a spatial trend in some areas that have a high concentration of non-White populations and lower-income households (see **Figure 63 and Figure 86**).

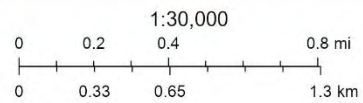
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<sup>6</sup> <https://www.americanprogress.org/issues/race/reports/2019/08/07/472617/systemic-inequality-displacement-exclusion-segregation/>



8/17/2021, 4:16:35 PM

- City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000



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Figure 65. City Median Income (2015-2019)





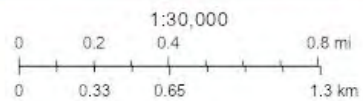
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City/Town Boundaries

(A) Median Income (ACS, 2010-2014) - Tract

<100,000

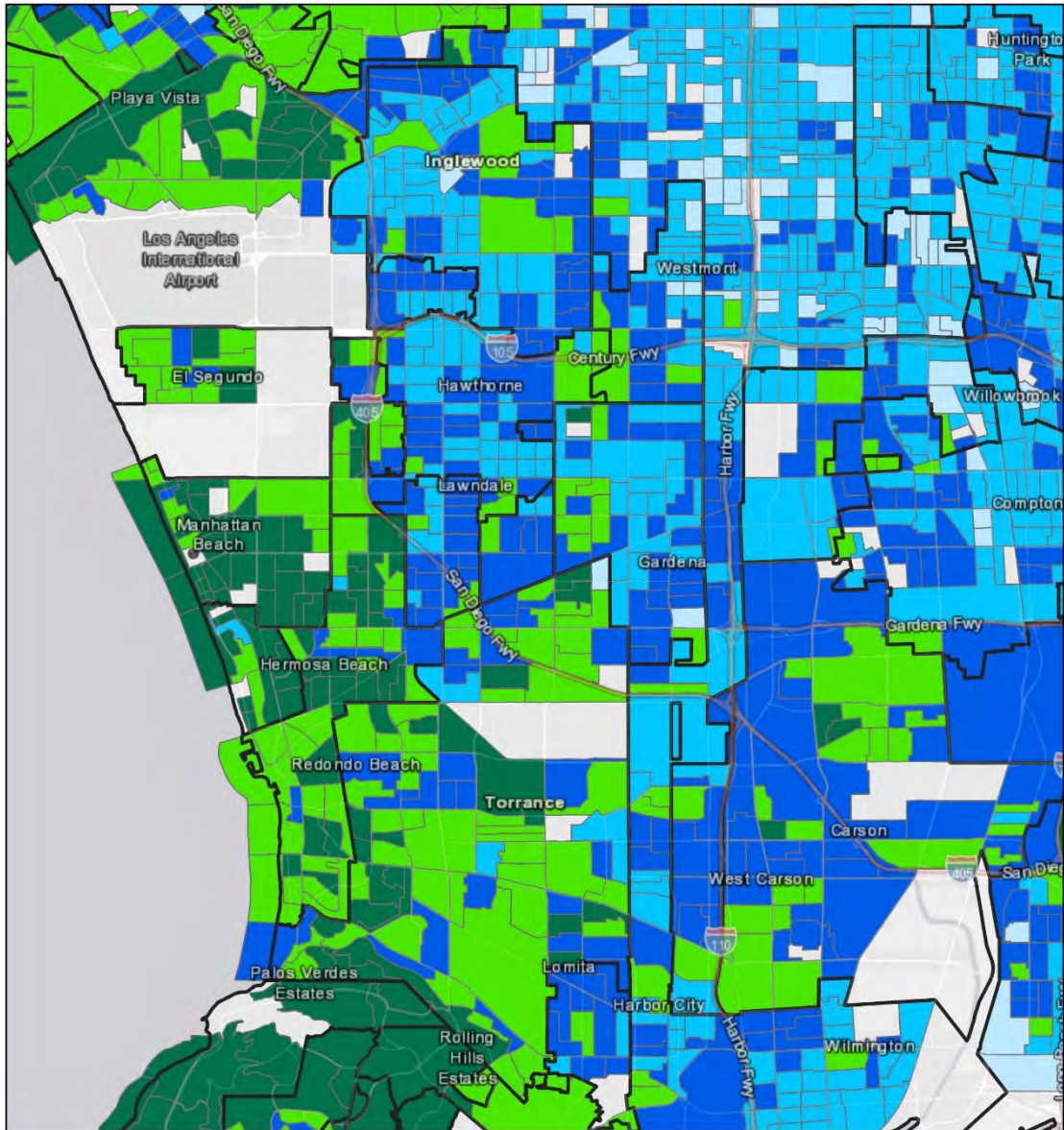
Greater than \$100,000



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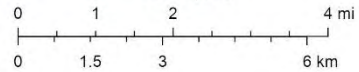
Figure 7. City Median Income (2010-2014)



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- City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group
- < \$30,000
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000



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Figure 86. Regional Median Income

#### 4.2.4 Familial Status

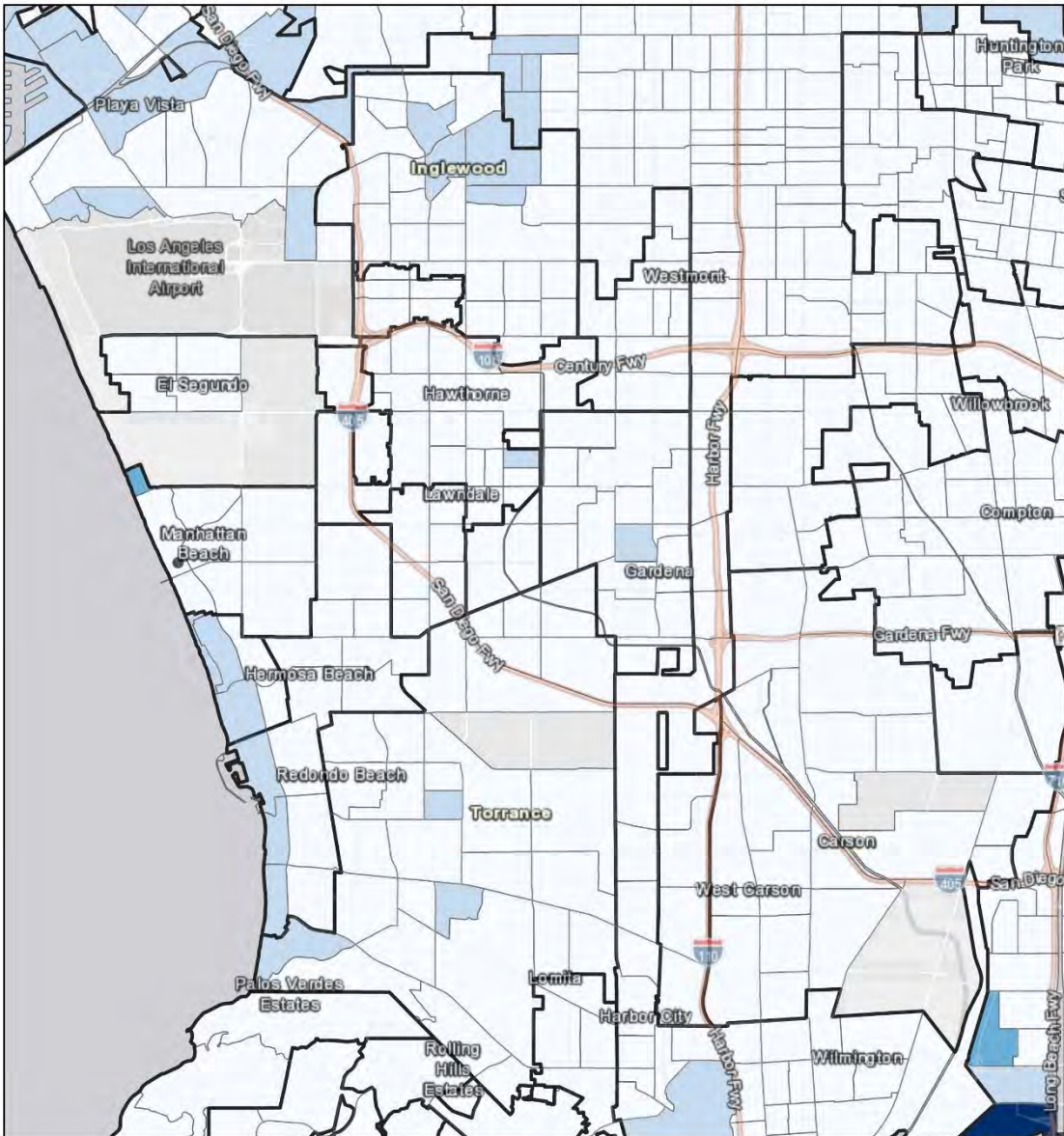
Familial structures can impact the care of children, type of housing needed, financial needs, and more. For example, single-parent households generally require more support for childcare than married or cohabitating couples, which can impact the jobs available to parents, income levels, and the amount of support afforded to children. Large families also have a special set of obstacles, such as fewer options or access to adequately sized and affordable housing. According to the HCD, past exclusionary zoning policies have led to discriminatory effects on protected characteristics such as race, disability, and familial status.<sup>7</sup> Family structure has evolved over time in the United States, with fewer couples marrying and cohabitation occurring more often. Families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some rental owners may charge larger households a higher rent or security deposit. And according to a 2016 study by HUD, compared to households without children, households with children were shown slightly fewer units and were commonly told about units that were slightly larger, and as a result, slightly more expensive to rent.<sup>8</sup> Therefore, this section will analyze patterns or trends of segregation or integration related to familial status at the local and regional levels.

**Figure 97, Population Living Alone**, indicates that there is a low percentage of the population 18 years and older in households living alone at the tract level. The majority of the City, and region, shows less than 20 percent of the population 18 years and older living alone. There is one tract in the northwest corner of the City where approximately 40 percent to 60 percent of the population lives alone. It can be expected that the population living alone is a lower percentage as the cost of living in the region is unfeasible for those many with single incomes. In contrast, **Figure 108, Population Living with a Spouse**, shows the majority of tracts within the City have approximately 60 percent to 80 percent of its population 18 years and older who live with a spouse. When compared to the region, the City is one of the few cities that have a percent of population 18 years or older living with a spouse that is over 60 percent. Similarly, most coastal cities have a percent proportion of the population 18 years or older living with a spouse that is 40 percent to 60 percent. However, less than 40 percent of the population of inland and Gateway cities are 18 years and over live with their spouse. **Figure 119, Children in Married-Couple Households**, and **Figure 120, Children in Single-Headed Households**, show the percentage of children in married-couple and single-headed households at the tract level. **Figure 119** indicates that most of the tracts in the City and coastal cities have high percentages, 60 percent to 80 percent and greater than 80 percent, of children in married-couple households, and cities east of the coastal areas have lower (20 percent to 40 percent) and moderate (40 percent to 60 percent) percentages of children in married-couple households. **Figure 120** indicates that the majority of the City has less than or equal to 20 percent of children who live in single-headed households; other coastal cities show a similar trend, and cities to the east indicate low (20 percent to 40 percent) to moderate (40 percent to 60 percent) percentages of children in single-headed

<sup>7</sup> [https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf)

<sup>8</sup> <https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf>

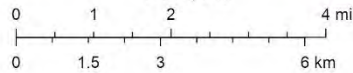
households, with pockets of higher percentages (60 percent to 80 percent) in Inglewood and Playa del Rey–Westchester, located north of the Los Angeles International Airport (LAX).



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City/Town Boundaries

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**Legend**

City/Town Boundaries



(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

Percent of Population Over 18 Living Alone

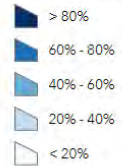
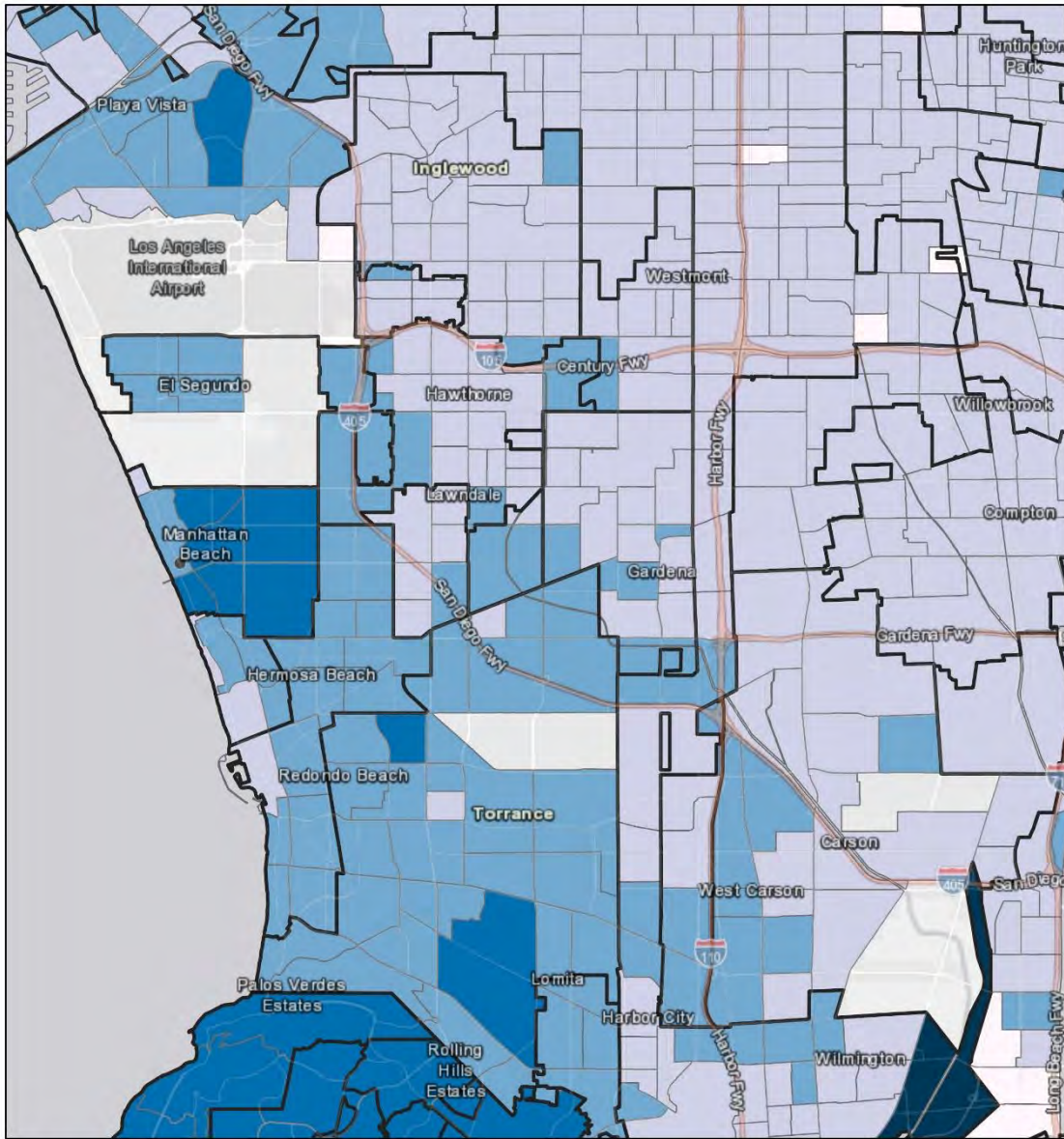
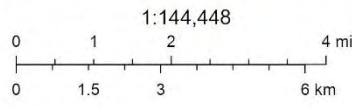


Figure 97. Population Living Alone



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City/Town Boundaries



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**Legend**

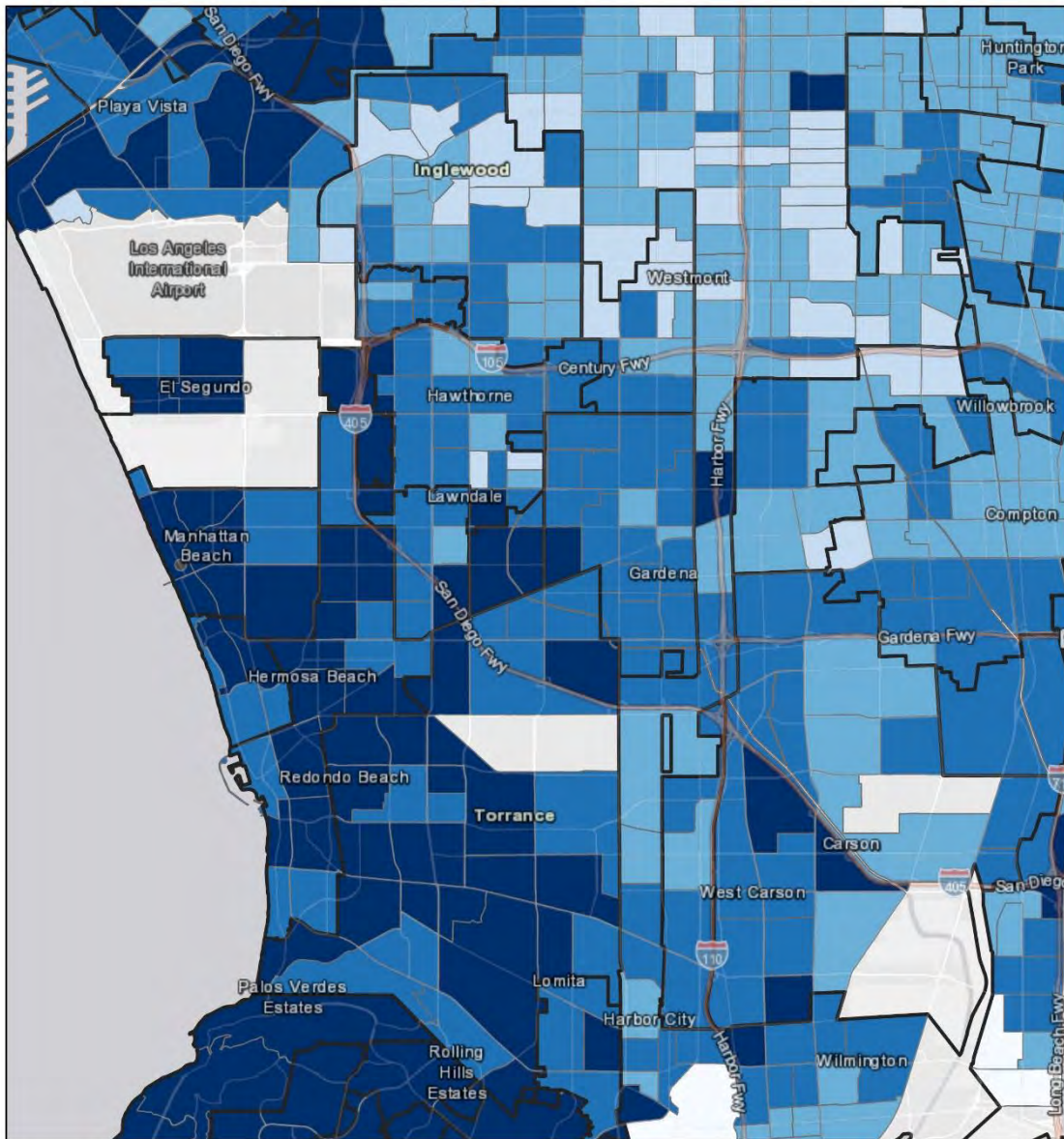
City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract



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Figure 108. Population Living with a Spouse



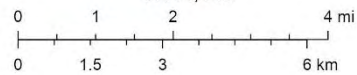
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City/Town Boundaries

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

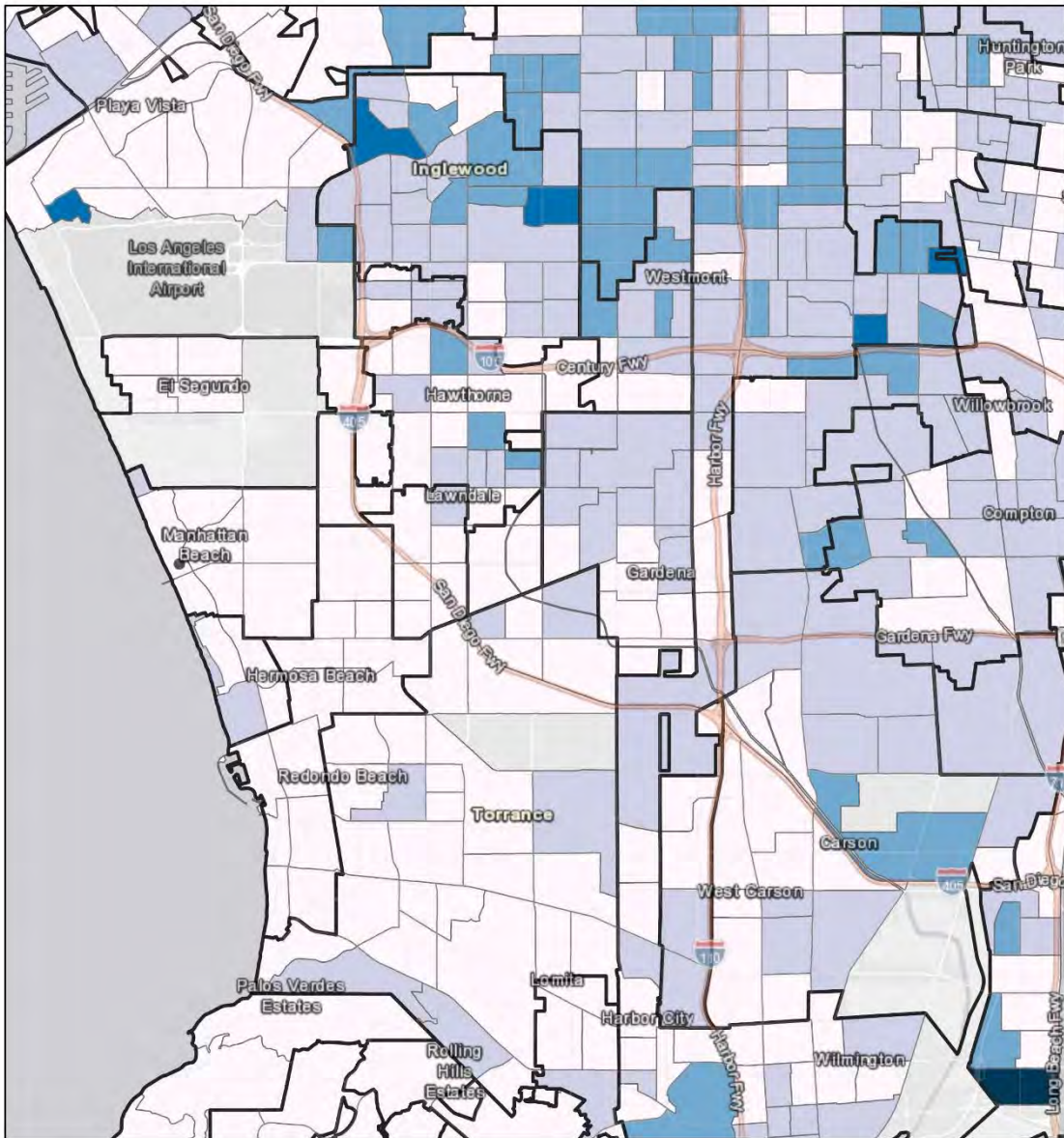
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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CA HCD  
City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

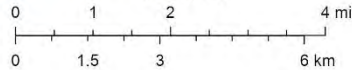
Figure 119. Children in Married-Couple Households



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City/Town Boundaries

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**Legend**

City/Town Boundaries



(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

Percent of Children in Female Householder, No Spouse/Partner Present Households

- > 80%
- 60% - 80%
- 40% - 60%
- 20% - 40%
- ≤ 20%

CA HCD

City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

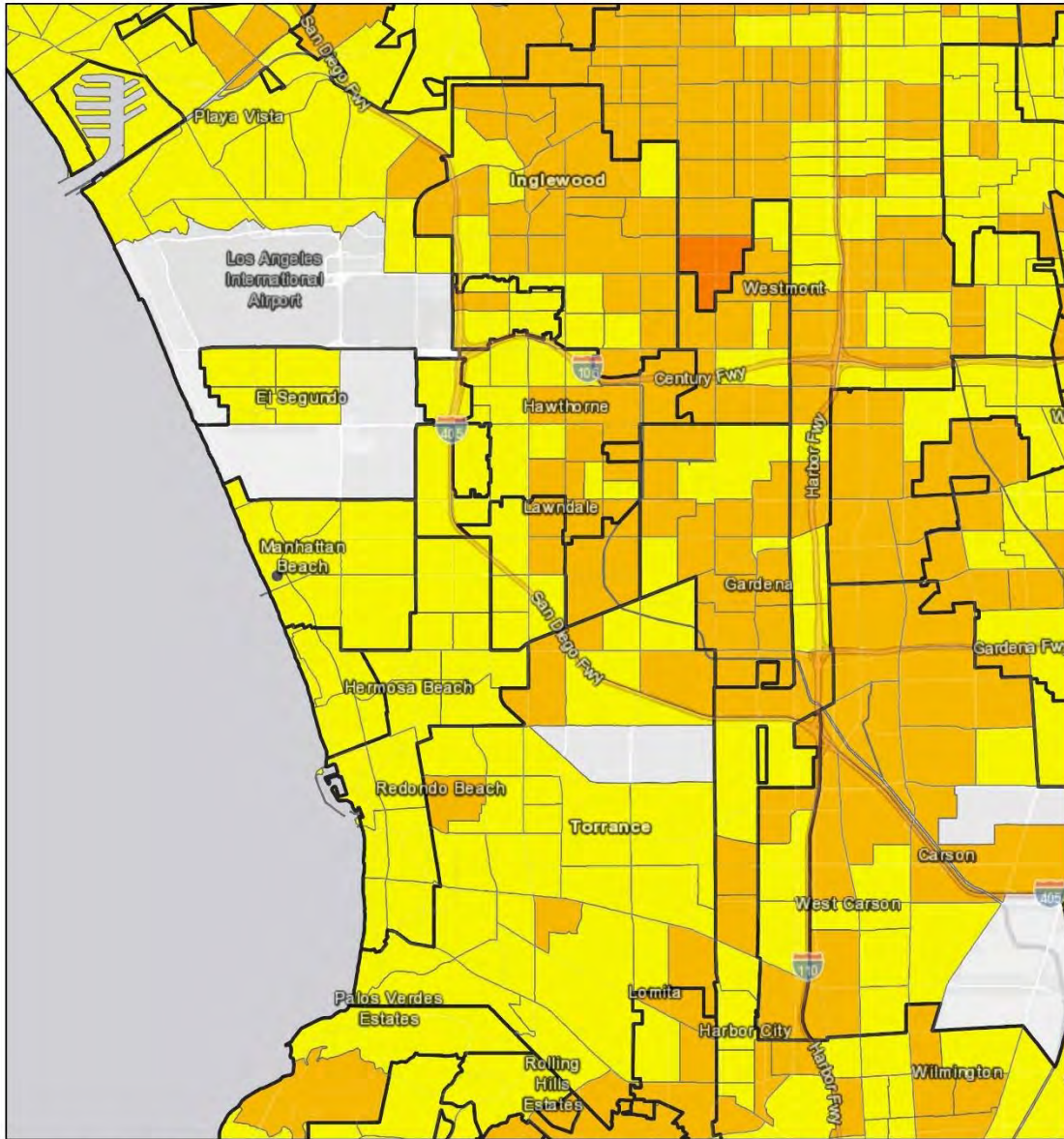
Figure 129. Children in Single-Headed Households



#### 4.2.5 Persons with Disabilities

Persons with disabilities can often experience discrimination in the housing process, or difficulties navigating certain dwelling units or areas. Fair housing choice for persons with disabilities can be compromised based on the nature of a person’s disability. Disability types include individuals with hearing, vision, cognitive, ambulatory, self-care, or independent living difficulties. Persons with physical disabilities may face discrimination in the housing market because of the need for home modifications to improve accessibility or other forms of physical assistance. Persons with developmental disabilities or mental disabilities includes cerebral palsy, epilepsy, autism, and other conditions related to intellectual disability. Persons with a mental disability may also face discrimination in the housing market because of stigma around mental disabilities. For example, rental owners may refuse to rent to tenants with a history of mental illness. Another example of housing discrimination is neighborhood opposition to public or private facilities, which impacts people with developmental disabilities seeking a community residential facility. According to California Welfare and Institutions Code Section 4900(e), a “facility” means a public or private facility, program, or service provider providing services, support, care, or treatment to persons with disabilities, even if only on an as-needed basis or under contractual arrangement. This includes a hospital; a long-term health care facility; a community living arrangement for people with disabilities, including a group home; a board and care home; an individual residence or apartment of a person with a disability where services are provided; a day program; a juvenile detention facility; a homeless shelter; a facility used to house or detain persons for the purpose of civil immigration proceedings; and a jail or prison, including all general areas, as well as special, mental health, or forensic units.

According to population disability data available through the U.S. Census Bureau’s American Community Survey, 5-Year Estimates, 2015–2019, the percent of the population with a disability, including a developmental disability, is less than 10 percent throughout the City, with no specific area of concentration, as seen in **Figure 131, Population with a Disability**. [An analysis of patterns over time for those with a disability shows that the 2010-2014 Census data also reflects less than 10 percent of the City’s population across all tracts of the City has a disability, indicating no change over the 9-year period. This is a fairly low number compared to the region, where the population with disabilities can be up to 20 percent in inland South Bay and Gateway cities.](#) According to Appendix B, the most common disability in the City for ages 5 to 17 is cognitive disability, accounting for 1.2 percent of that population. Among the population ages 18 to 64, cognitive disability was also the most common disability, followed by visual disability. In the 65 and older age category, the most common disability was independent living at 12.8 percent, followed by a hearing disability at 10 percent, and ambulatory disability at 9.9 percent. Please see Appendix B for disability classifications. At a regional scale, abutting cities also have 10 percent or less of their population with a disability. The City of Torrance and other cities to the east have a higher population, of 10 percent to 20 percent; tracts in Inglewood and Westmont have a relative high population, with a disability at 20 percent to 30 percent.

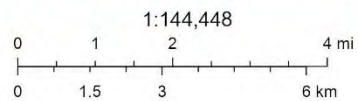


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City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%
- 20% - 30%



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

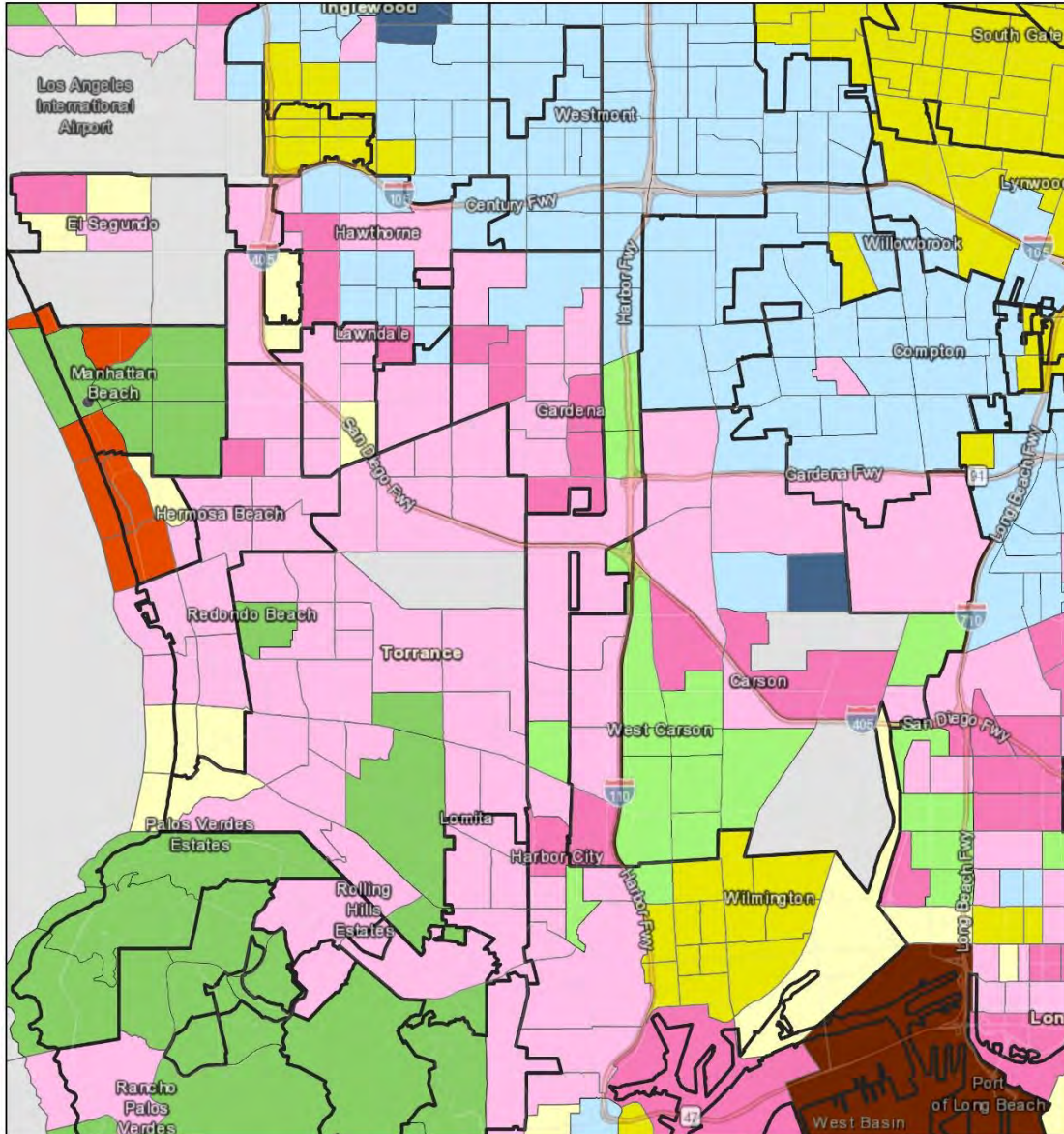
Figure 134. Population with a Disability

## 4.2.6 Neighborhood Segregation

Typologies in **Figure 142, Neighborhood Segregation**, identify which racial or ethnic groups have more than 10 percent representation within the given tract. **Figure 142** shows that the majority of the City is occupied by an Asian–White population, and areas to the northwest and southwest of the City are occupied by a mostly White population. There are no diverse tracts identified in the region; however, to the east of the City, the map indicates there are various races/ethnicities, such as Black, White, Asian, or Latinx, making up 10 percent or more of the tract’s population. A “3 Group Mix,”<sup>9</sup> displayed as a light shade of pink in the figure, indicates that there is a mix of three races/ethnicities, and a “4 Group Mix,” displayed as a darker shade of pink, indicates there is a mix of four races/ethnicities. The mix of race and ethnicity in these groups may vary from the aforementioned racial/ethnic groups. Although there are pockets of mixed races, such as Latinx–White, to the south, east, and north of the City, the map also indicates there is a large Black–Latinx community to the east, specifically in the Inglewood and Westmont areas.

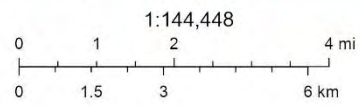
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<sup>9</sup> “Mix” of races indicates there are three or four racial/ethnic groups that have more than 10 percent representation within the given tract.



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- City/Town Boundaries
- Asian-Latinx
- Asian-White
- Black-Latinx
- Mostly Black
- Latinx-White
- Mostly Latinx
- Mostly White
- Mostly Other
- 3 Group Mix
- 4 Group Mix
- Unpopulated Tract



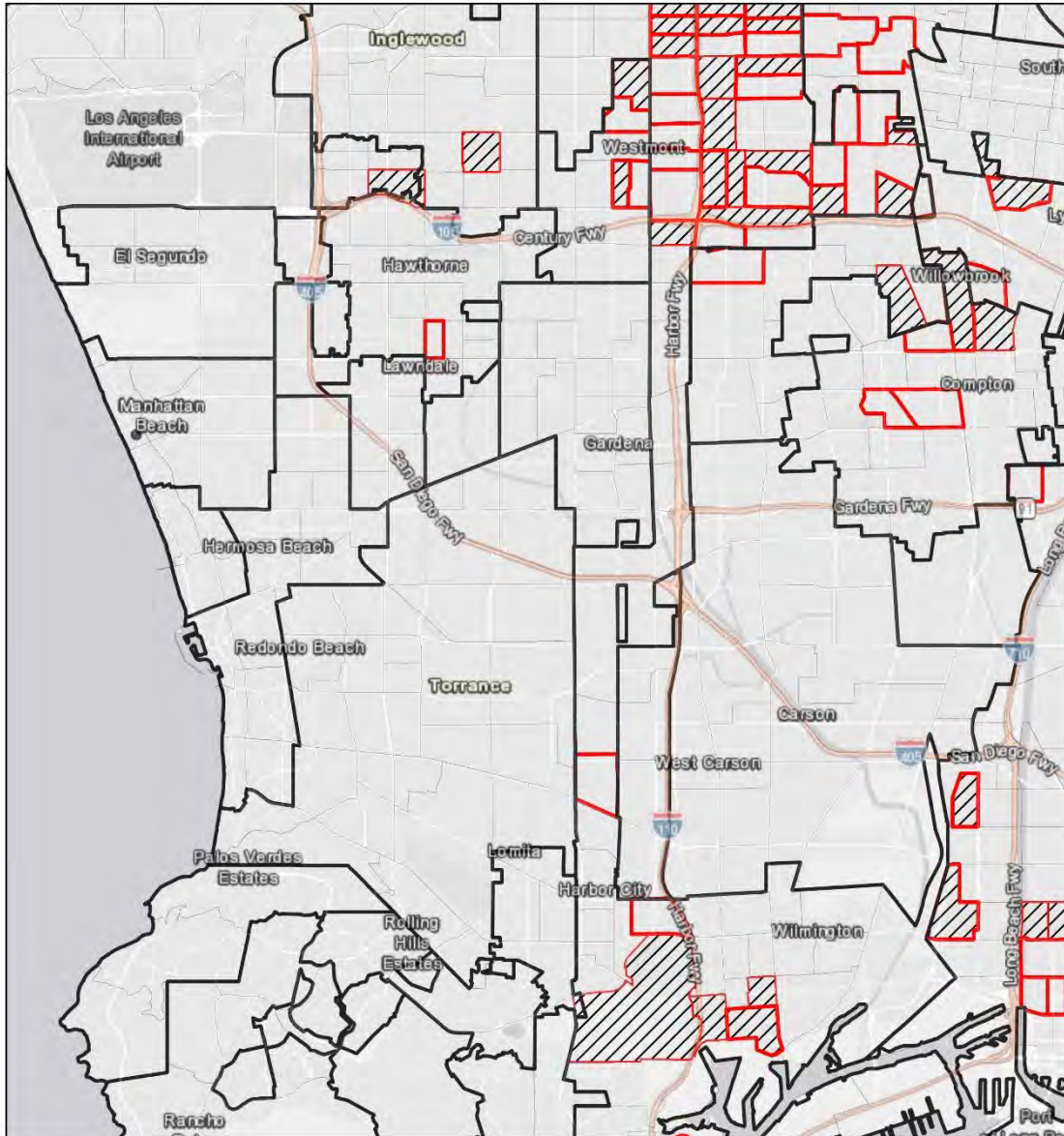
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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | CA HCD

Figure 142. Neighborhood Segregation

### 4.3 Racially or Ethnically Concentrated Areas of Poverty

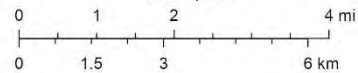
Racially or ethnically concentrated areas of poverty (R/ECAPs) are neighborhoods with concentrations of both poverty and singular races or ethnicities. These are generally Census tracts with a majority of non-White residents and a poverty rate of 40 percent-plus, or three times the average tract poverty rate for the County. In addition to highlighting historic discrimination, R/ECAPs also have lower economic opportunity in the present day. In the City, there are no R/ECAPs or areas of high segregation and poverty at the tract level, as determined by California Tax Credit Allocation Committee (TCAC) opportunity areas mapping analysis of 2021. **Figure 153, Regional R/ECAPs and High Segregation and Poverty**, shows that R/ECAPs and areas of high segregation and poverty are prevalent east of the City in the Gateway Cities region.



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- City/Town Boundaries
- (R) TCAC Area of High Segregation and Poverty (2021) - Tract



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

Figure 153. Regional R/ECAPs and High Segregation and Poverty

## 4.4 Racial Concentrations in Areas of Affluence

In contrast to R/ECAPs, racially concentrated areas of affluence (RCAs) are those areas with higher incomes and concentrations of White residents. These are areas where 80 percent or more of the population is White, and the median household income is \$125,000 or more. The RCA mapping data is not available in the HCD AFFH Data Viewer mapping tool. Therefore, the analysis uses Census data and selected 2019 American Community Survey estimates to identify block groups that meet the RCA criteria. As shown in **Figure 164, Racially Concentrated Areas of Affluence**, there are several block groups west of Sepulveda Boulevard that are considered an RCA. The RCA in the City is generally bound by Rosecrans Avenue to the north and Duncan Avenue to the south; the western and eastern boundaries vary throughout. South of Manhattan Beach Boulevard, the RCA is generally bound by Pacific Avenue to the east and the Pacific Ocean to the west. North of Manhattan Beach Boulevard and south of Marine Avenue, the RCA is generally bound by Palm Avenue to the east and N. Valley Drive to the west. North of Marine Avenue and south of Rosecrans Avenue, the RCA is generally bound by Flournoy Road to the east and Ocean Drive to the west. [Local land use decisions that may have contributed to RCAs includes the lack of regulations that historically allowed for mansionization of homes in the City. Mansionization occurs when large homes replace historically small homes, on consolidated and standard sized lots, appearing out of scale and result in an impression of unrelieved building bulk, screening out light and air and dwarfing existing standard sized buildings in a neighborhood. The consolidation of lots for mansionization has created an inefficient use of land for homes that can only be afforded by affluent households, diminishing capacity in already low-density areas. Program 23, Preserving Housing Capacity, details the City's efforts to avoid further mansionization](#)

At a regional scale, some coastal cities, such as Hermosa Beach, Redondo Beach, and Palos Verdes Estates, also have block groups that meet the RCA criteria (see **Figure 175, Regional Racially Concentrated Areas of Affluence**). Areas north of the City, near Beverly Hills and West Hollywood, also have RCA block groups. The location of households with a median income of \$125,000 or more along the California coast can be attributed to high land and building costs, as they are among the highest in the country.<sup>10</sup> According to the California Legislature's Nonpartisan Fiscal and Policy Advisor, Legislative Analyst's Office, California's coastal areas are building housing at a rate lower than the demand for housing, which is also contributing to high housing costs. The high cost of living in the City, and along the coast, may indicate why there is a concentration of residents with higher incomes.

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<sup>10</sup> <https://lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.aspx>

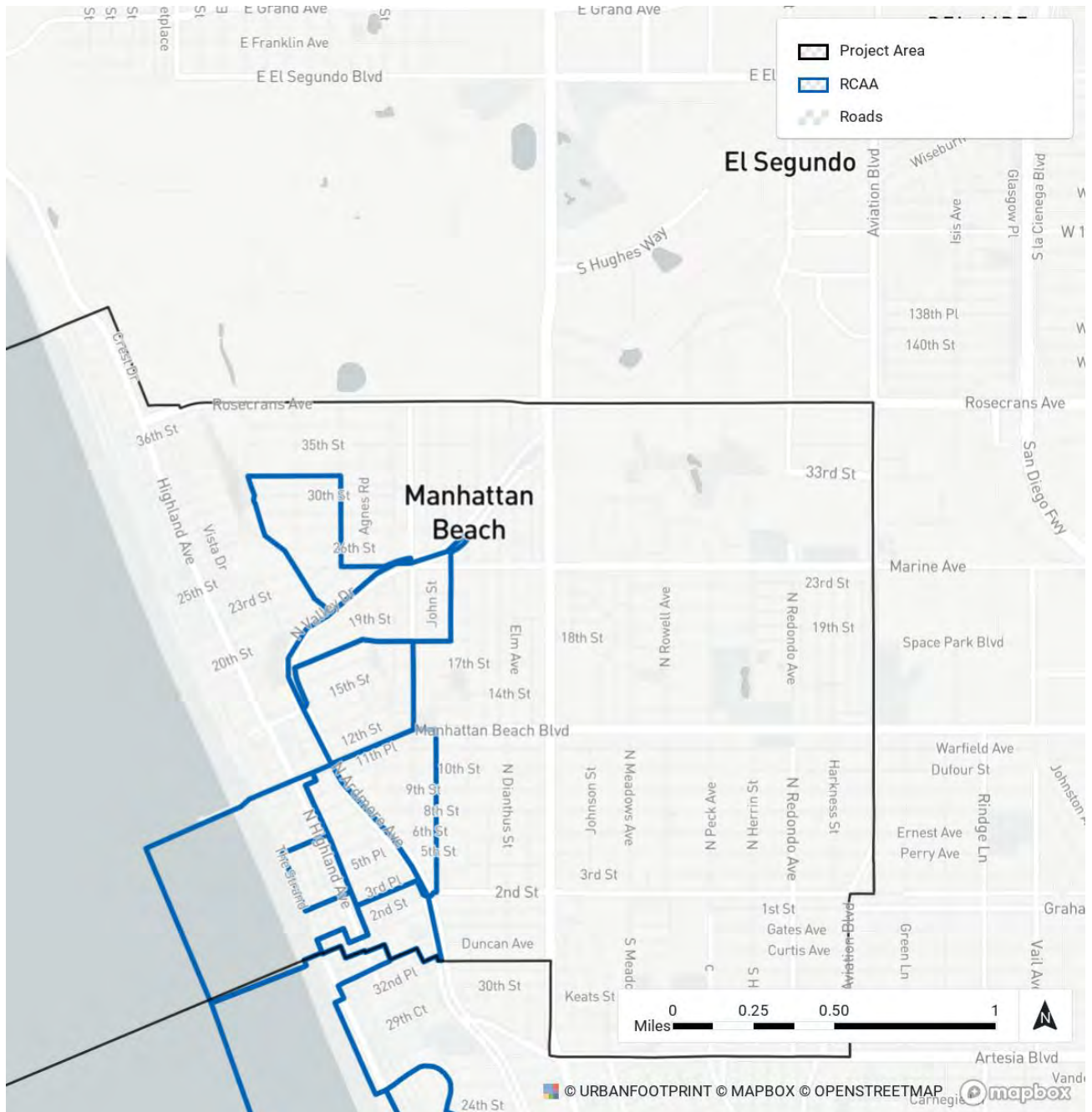


Figure 164. Racially Concentrated Areas of Affluence





Figure 175. Regional Racially Concentrated Areas of Affluence

## 4.5 Patterns Over Time

### 4.5.1 Mortgage Loan Access

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. Lending policies and requirements related to credit history, current credit rating, employment history, and the general character of applicants permit lenders to use a great deal of discretion, and in the process, can deny loans even though the prospective borrower would have been an acceptable risk.

Like many regions throughout the United States, Los Angeles County has a history of excluding non-White people from the housing market through practices such as mortgage redlining. Mortgage redlining is a mapping exercise practiced in the 1930s by the Federal government’s Home Owners’ Loan Corporation that was used to guide mortgage-lending desirability in residential neighborhoods based on [the](#) racial and ethnic demographics [of an area’s population](#). Local real estate developers and appraisers assigned grades of A through D to residential neighborhoods that indicated the following:<sup>11</sup>

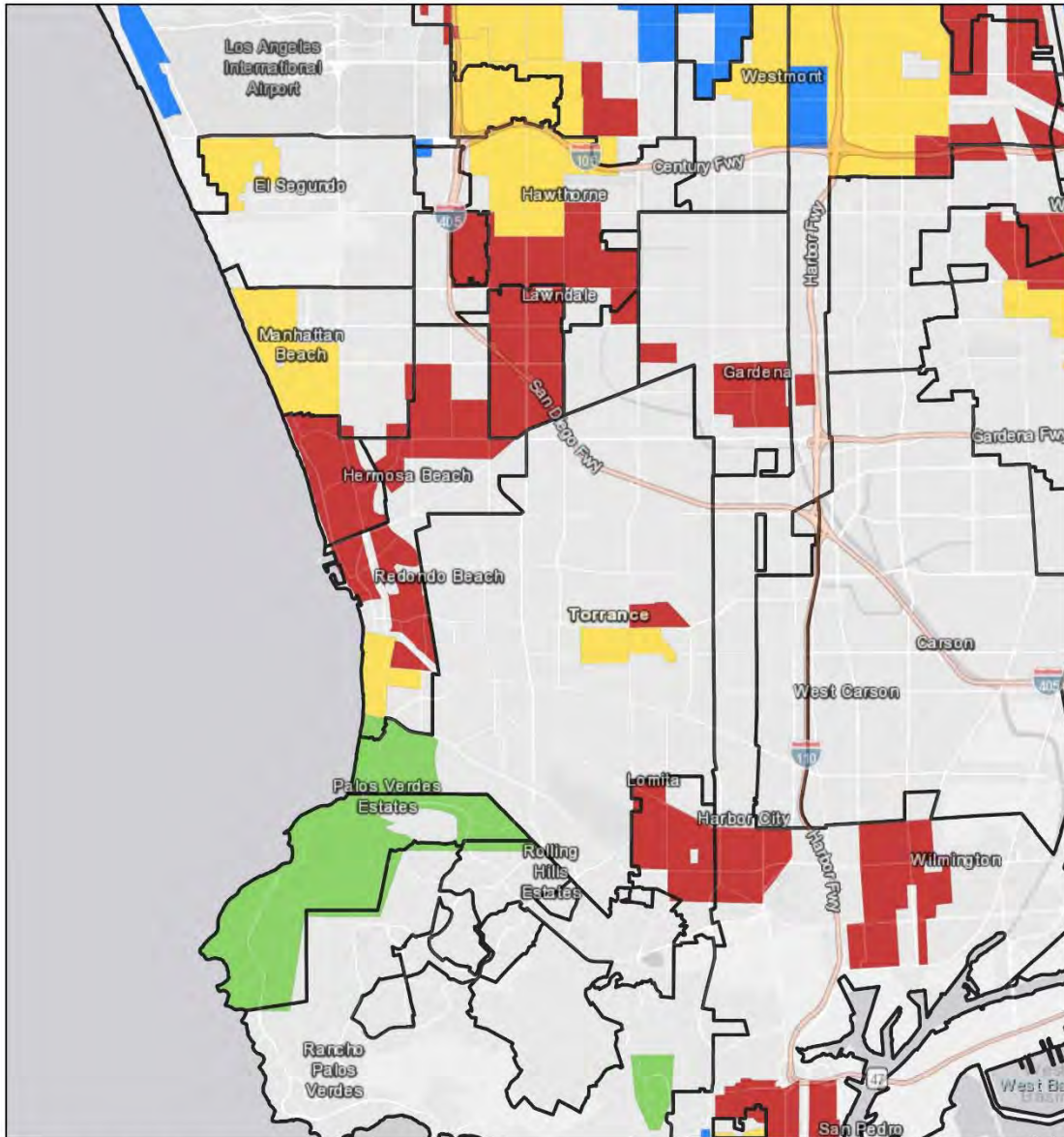
- A (Best): Always upper- or upper-middle-class White neighborhoods that the Home Owners’ Loan Corporation defined as posing minimal risk for banks and other mortgage lenders, as they were “ethnically homogeneous” and had room to be further developed.
- B (Still Desirable): Generally nearly or completely White, U.S.–born neighborhoods that the Home Owners’ Loan Corporation defined as “still desirable” and sound investments for mortgage lenders.
- C (Declining): Areas where the residents were often working class and/or first- or second-generation immigrants from Europe. These areas often lacked utilities and were characterized by older building stock.
- D (Hazardous): These areas often received this grade because they were “infiltrated” with “undesirable populations,” such as Jewish, Asian, Mexican, and Black families. These areas were more likely to be close to industrial areas and to have older housing.

Mortgage redlining made it difficult for people of color to access loans for homeownership because banks refused to lend to areas with the lowest grade. According to Home Owners’ Loan Corporation maps from the 1930s, the western portion of the City was considered to be “Declining” with a C grade, and the southern and eastern boundaries were identified as “Hazardous,” or D grade (see **Figure 186, 1930s Home Owners’ Loan Corporation Map**). Studies link parts of cities historically labeled as Declining or Hazardous to have lower rates of economic mobility than those labeled as Best or Still Desirable.<sup>12</sup> However, this relationship is not applicable in the City because it has high access to opportunity (see **Section 4.6, Access to Opportunity**). Furthermore, present-day median home values in the City are relatively high, at \$2,923,949, according to the Zillow Home Value Index from August 2021. The median home value has increased 12.3 percent since the previous year (2020). [The high concentration of White populations in the City today \(Figure 197, Predominant Population - White Majority Tracts\)](#) shows that while the area may have once been more diverse, especially in those areas with a grade of D (**Figure 18, 1930s Home Owners’**

<sup>11</sup> <https://dsl.richmond.edu/panorama/redlining/#loc=5/36.4571-88.242&advview=full&text=intro>

<sup>12</sup> <https://www.upforgrowth.org/news/legacy-redlining-lives-today-through-exclusionary-zoning>

Loan Corporation Map). The exclusion of access to home mortgages may have left many households displaced by households that had access to funds for homeownership without the need for loans, which could explain the majority of the White population in all tracts across the City. Additionally, when compared across the region, those tracts in cities along the coast have higher concentrations of White populations. Coastal communities are often more desirable and housing prices tend to be higher. The City also has a large percentage of households with moderate- and above moderate-incomes, relatively higher than most areas in the region (see **Figure 86**), and parts of the City are considered to be an RCAA, as identified in **Figures 164 and 175**.



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City/Town Boundaries

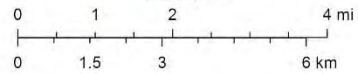
(A) Home Owners Loan Corporation Redlining Grade (University of Richmond, 2021)

A (Best)

B (Still Desirable)

C (Declining)

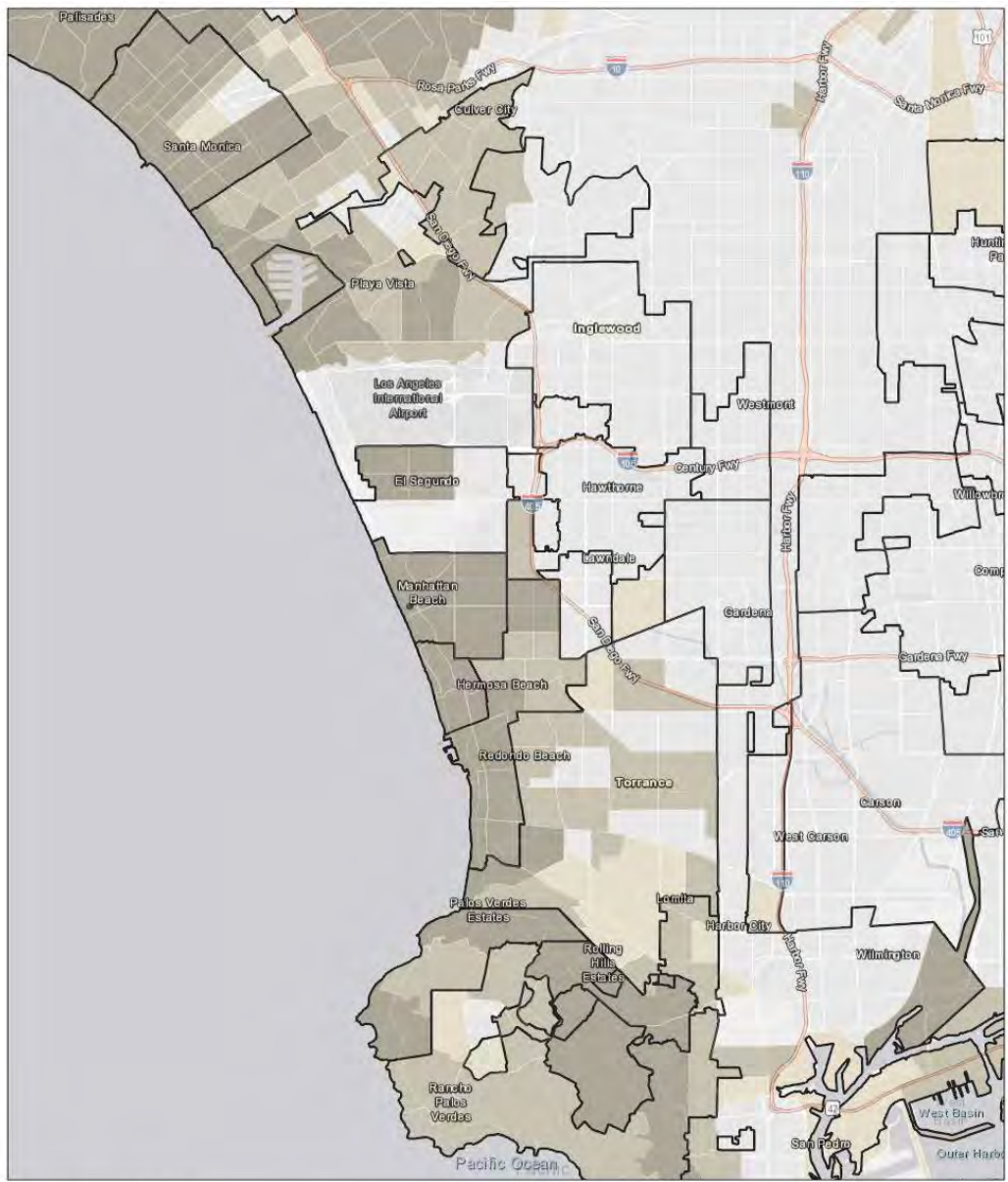
D (Hazardous)



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Figure 186. 1930s Home Owners' Loan Corporation Map



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 City/Town Boundaries  
 (R) Predominant Population - White Majority Tracts  
 Slim (gap < 10%)  
 Sizeable (gap 10% - 50%)  
 Predominant (gap > 50%)

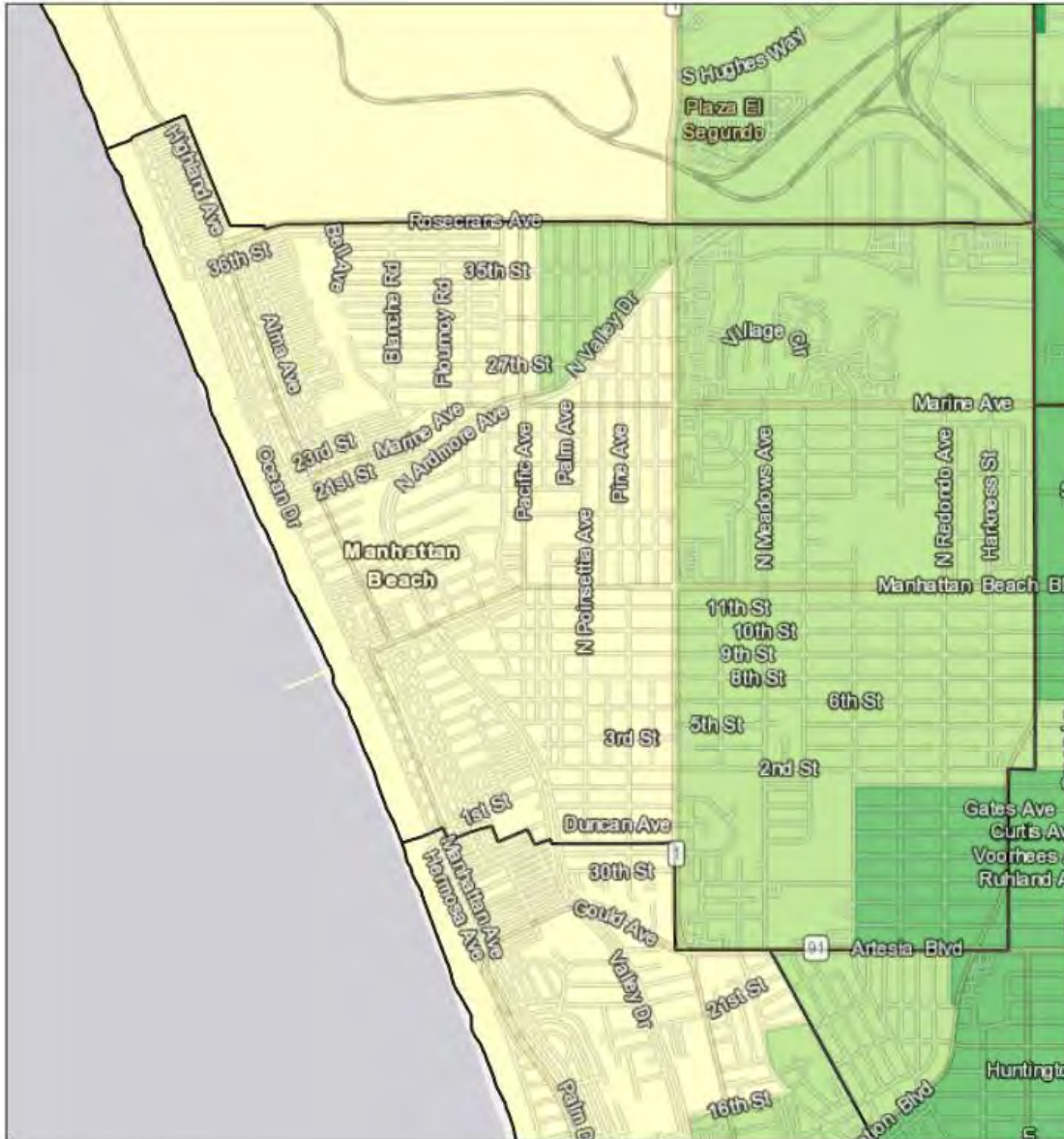
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 0 2 4 8 km

Figure 197. Predominant Population – White Majority Tracts

## 4.5.2 Demographic Trends

According to the U.S. Census Bureau's American Community Survey 2019 data, the total population in the City is 35,058, which has remained stable, but with a slight decrease by about 0.22 percent from 2010 to 2021. Los Angeles County, in comparison, has grown 2.3 percent from 2010 to 2021. The racial and ethnic composition of the City differs from the County in that a lower proportion of City residents are Hispanic/Latino or other racial minorities. Approximately 73 percent of City residents are non-Hispanic White, contrasted with 26 percent for the County as a whole. The percentage of Hispanics residing in the City, at 8 percent, is significantly lower than that of the County, with 48 percent Hispanic/Latinx. Asians, at 13 percent, represent the largest non-Hispanic minority in the City. Appendix B provides additional data and analysis of the demographic patterns within the City.

Figure ~~X2018a~~, Diversity Index (2010), shows the diversity index of the City by Census block group in 2010. Block groups east of Sepulveda Boulevard have a diversity index of 40 to 55, and an area to the southeast has a higher index of 55 to 70. Block groups west of Sepulveda Boulevard have the lowest diversity. In 2018, as shown in Figure ~~X2118b~~, Diversity Index (2018), diversity in the City increased. Specifically, along Rosecrans Avenue where the diversity index is now 40 to 55 and in the southeast where it is 55 to 70 between Artesia Boulevard and 8th Street. As evident by data and maps discussed in Section 4.2.2, Race and Ethnicity, patterns over time indicate that the population of cities east of Manhattan Beach are becoming increasingly diverse and non-White. At the City scale, this can clearly be seen at the fringes of the eastern borders of the City. It can be expected that this pattern of increased diversity will continue over time.



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City/Town Boundaries

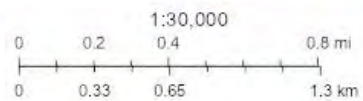
(A) Diversity Index (2010) - Block Group

Lower Diversity

40 - 55

55 - 70

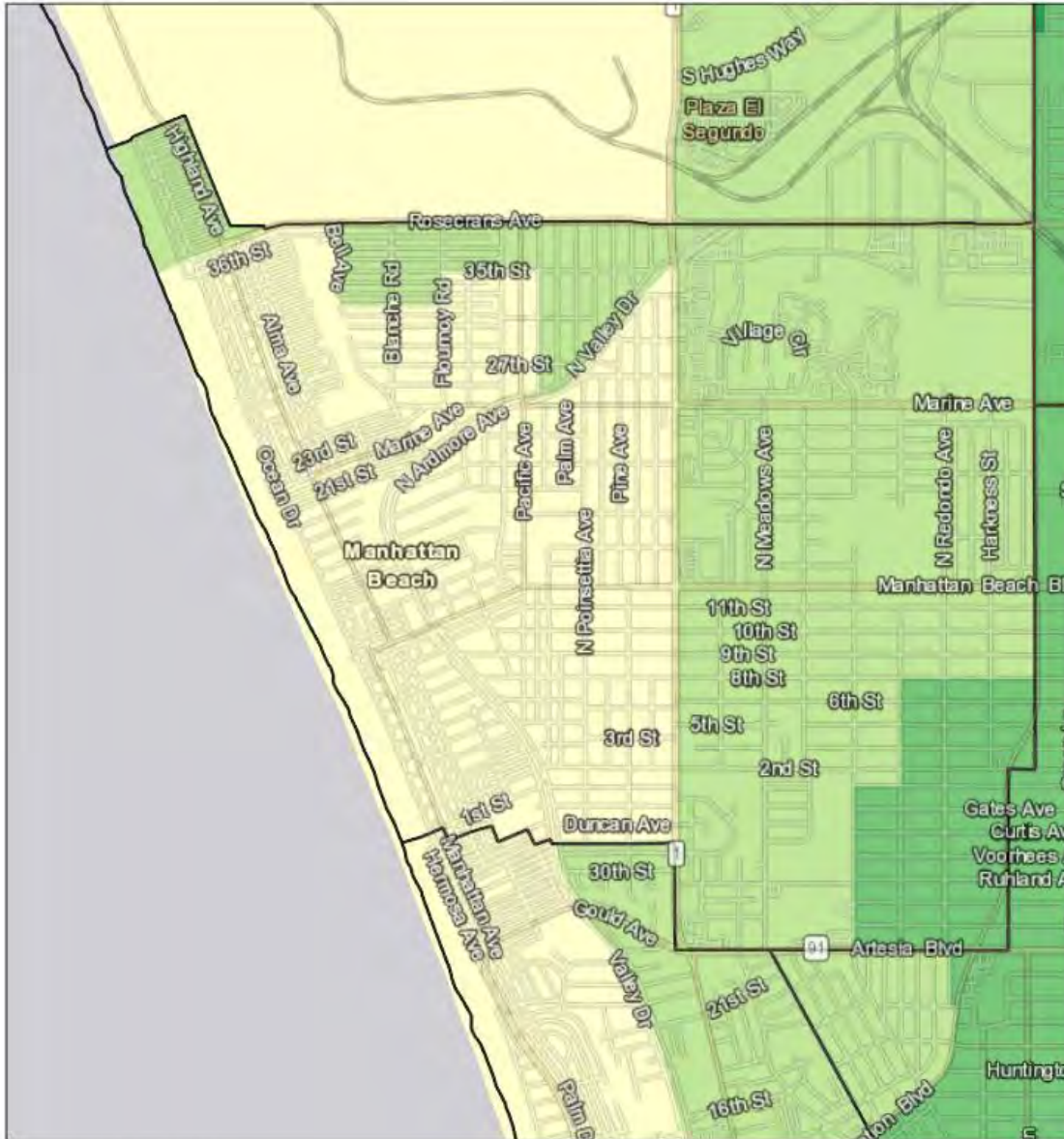
70 - 85



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Figure X2018a. Diversity Index (2010)



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City/Town Boundaries

(A) Diversity Index (2018) - Block Group

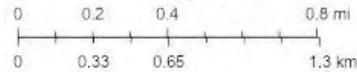
Lower Diversity

40 - 55

55 - 70

70 - 85

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Figure X2118b. Diversity Index (20158)



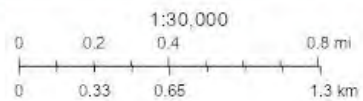
### 4.5.3 Poverty

Figure 22a, Poverty Status (2010-2014), provides the poverty status as a percent of total population in the City by Census tract ~~in 2010~~. Poverty accounts for less than 10 percent of the City and surrounding areas, with the exception of a tract in the northwest of the City near Highland Avenue which is 10 percent to 20 percent of the total population. According to the most recent ACS Census data as shown in **Figure ~~X2319b~~, Poverty Status (2015-2019)**, all tracts within the City have less than 10 percent of the total population with poverty status, indicating that poverty is not a primary concern for the City. Across the ~~ten-year~~ten-year span, it can be assumed that the poverty status in the City will remain stable over time. Poverty trends are similar across coastal cities in the region where poverty increases further east. Income at the regional scale is further detailed in Section 4.2.3.



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- City/Town Boundaries
- (A) Poverty Status (ACS, 2010 - 2014) - Tract
- < 10%
- 10% - 20%





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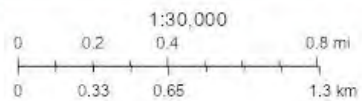
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Figure X2219a. Poverty Status (2010-2014)



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-  City/Town Boundaries
- (R) Poverty Status (ACS, 2015 - 2019) - Tract
-  < 10%



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Figure 2319bX. Poverty Status (2015-2019)

## 4.6 Access to Opportunity

Lower-income housing and racially segregated communities are disproportionately impacted by a combination of locational factors, such as proximity to landfills, freeways, industrial areas, and other toxins and pollutants. Recent studies have shown that the distribution of affordable housing has been disproportionately developed in minority neighborhoods with poor environmental conditions and high poverty rates, thereby reinforcing poverty concentration and racial segregation in low-opportunity and low-resource areas.<sup>13</sup>

Affordable housing in high-opportunity/high-resource areas provide low-income residents access to resources such as quality schools, employment, transportation, low poverty exposure, and environmentally healthy neighborhoods. Research indicates that among various economic and social factors, being in proximity to certain amenities can encourage positive critical life outcomes.<sup>14</sup> There has been an increased focus in deconcentrating poverty and promoting affordable housing in high opportunity areas. This trend is evident in the states' allocation of Low-Income Housing Credit dollars—the primary subsidy that is available for developing and preserving affordable housing. To allocate these credits, the California Housing Finance Agency developed a scoring system. In recent years, the scoring system has been adjusted to promote investment in affordable housing in areas with access to opportunity in the context of other affordable needs. Several agencies, including HUD and the HCD, in coordination with the California TCAC, have developed methodologies to assess and measure geographic access to opportunity (including education, poverty, transportation, and employment) in areas throughout California. The Opportunity Map created by the California TCAC and HCD (using data from 2020) is used to identify areas in the region with characteristics that are shown by research to support positive economic, educational, and health outcomes for low-income families, particularly long-term outcomes for children.

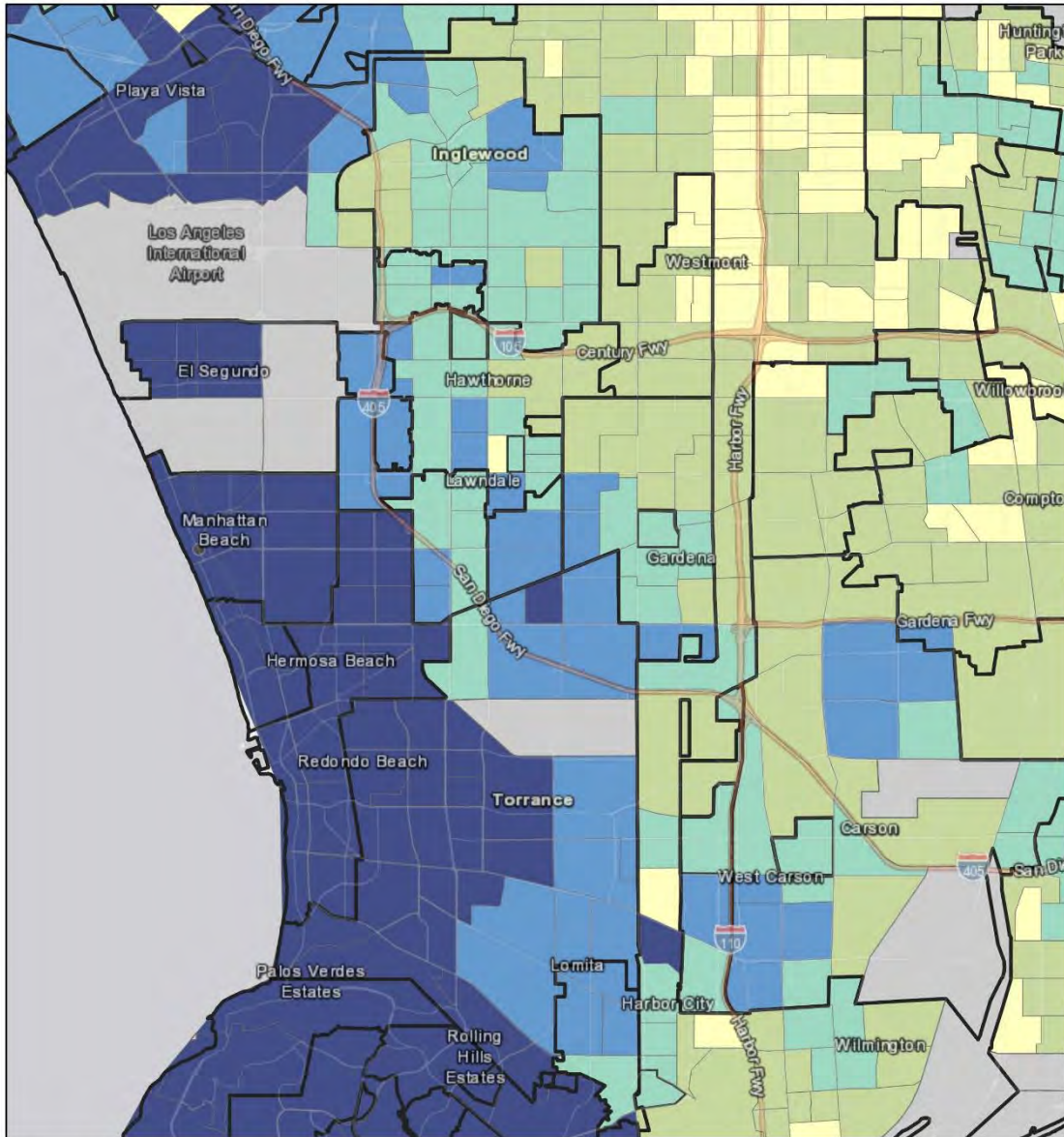
“High Resource” areas are those areas, according to research, that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. The primary function of the California TCAC is to oversee the Low-Income Housing Credit Program, which provides funding to developers of affordable rental housing. The Opportunity Map plays a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity. **Figure 17249, Opportunity Map**, identifies the entire City as “Highest Resource”—a composite score that is created from scoring access to opportunity in relation to education, economic development, and the environment. As such, affordable and publicly owned housing can be distributed in virtually any area within the City. **Figure 2417** indicates that coastal cities have a composite score of “Highest Resource.” However, toward the east, including Gateway Cities and some South Bay areas, cities have “High” composite scores, and inland areas toward downtown Los Angeles have “Moderate” and “Low” resource scores.

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<sup>13</sup> [https://www.povertylaw.org/wp-content/uploads/2020/06/environmental\\_justice\\_report\\_final-rev2.pdf](https://www.povertylaw.org/wp-content/uploads/2020/06/environmental_justice_report_final-rev2.pdf)

<sup>14</sup> Freddie Mac and the National Housing Trust. 2020. Spotlight on Underserved Markets: Opportunity Incentives in LIHTC Qualified Allocation Plans. [https://www.sahfnet.org/sites/default/files/uploads/resources/opportunity\\_incentives\\_in\\_lihtc\\_qualified\\_allocation\\_plans.pdf](https://www.sahfnet.org/sites/default/files/uploads/resources/opportunity_incentives_in_lihtc_qualified_allocation_plans.pdf)

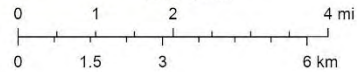
The following sections will review access to opportunity in relation to education, economic development, environment, and transportation, and access to opportunities for persons with disabilities at a local and regional scale.



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- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Composite Score - Tract
- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource



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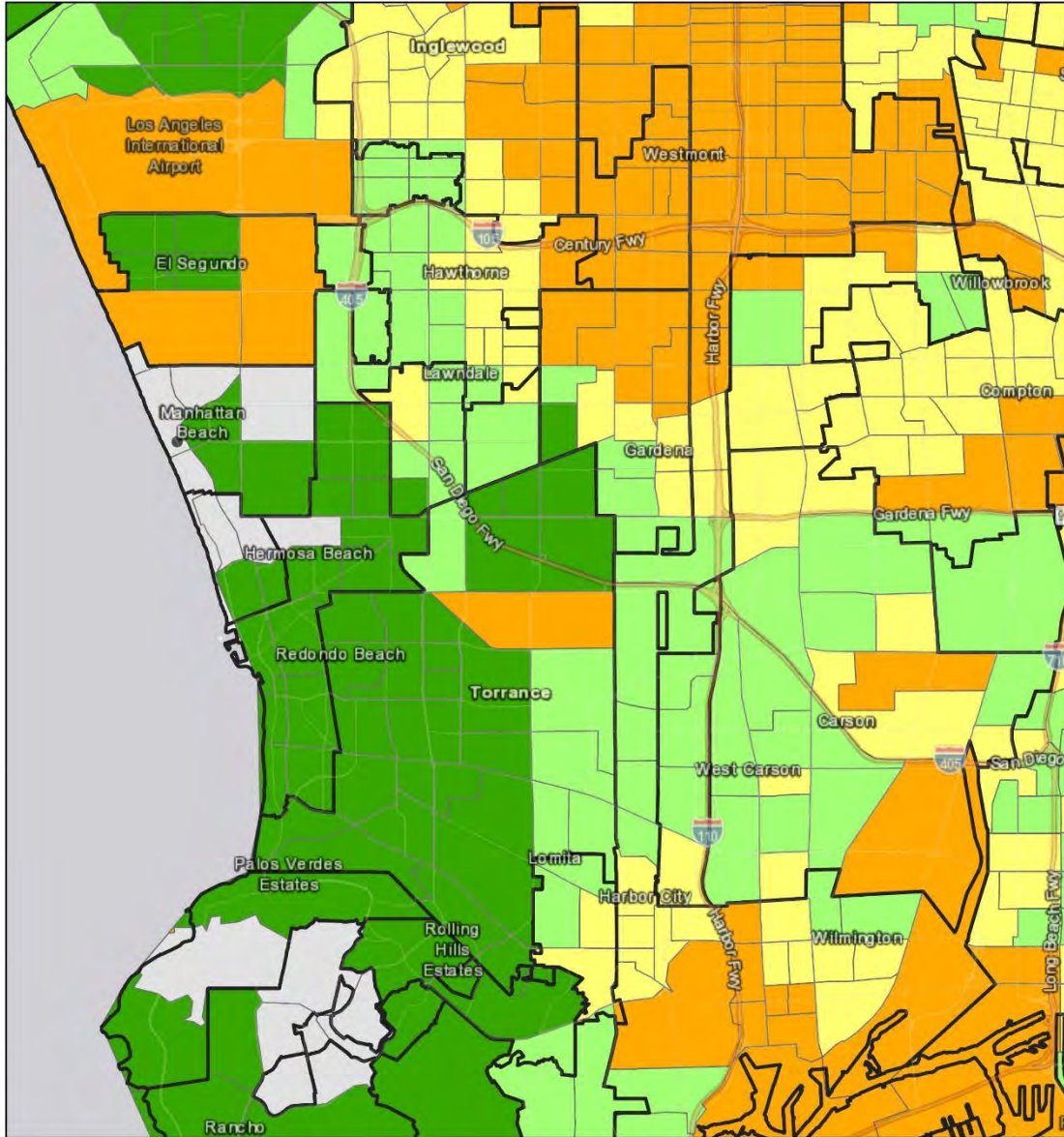
Figure 17240. Opportunity Map

#### 4.6.1 Education

The TCAC Opportunity Area Access to Education analysis considers math and reading proficiency standards, high school graduation rates, and student poverty rates. **Figure 18251, Access to Education**, shows that the City has more positive education outcomes, or a score of greater than 0.75. According to the Los Angeles County Office of Education, the Manhattan Beach Unified School District is responsible for public education in the City. There is one preschool, five elementary schools, one middle school, and one high school in the district. [Areas of the City along the coast and in the northern portions do not have available data in Figure 251, however local knowledge indicates that there are two schools along the coast and two schools in the north-eastern section of the City. Those areas with the highest educational outcomes correlate with those areas of the City that are most diverse and where there are higher concentrations of children in married couple households.](#)

GreatSchools.org is an online resource that compiles [local data on](#) ratings from students, families, and staff to provide performance feedback for schools and quality ratings for review by current and prospective students, producing an overall rating for schools based on aspects of education such as equity, college preparedness, and variety in educational opportunity. [Local data shows that](#) Mira Costa High School is rated above average (9/10) according to GreatSchools.org. The median elementary school rating for the district is 9/10, with four schools rated 9/10 and one rated 7/10. The Manhattan Beach Unified School District has strong parental, community, and corporate support through Parent Teacher Associations, volunteering, and endowments from the Manhattan Beach Education Foundation. According to the Manhattan Beach Education Foundation website, the foundation is a community-driven fundraising organization that supplements State funding for programs that inspire learning, enrich teaching, and promote innovation and academic excellence in the public schools of Manhattan Beach.

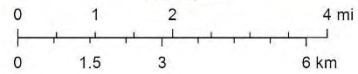
At a regional level, coastal cities score in the more positive education outcomes range, and other South Bay and Gateway Cities areas to the east score in the less positive outcomes (less than 0.25) and moderate outcomes (0.25 to 0.50, 0.50 to 0.75) categories. The most concentrated area of less positive outcomes is in Westmont and the eastern areas of Inglewood, which are located northeast of the City. Areas north of the City that indicate less positive outcomes are the locations of LAX and the Chevron refinery.



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- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Education Score -Tract
- < 0.25 (Less Positive Education Outcomes)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Education Outcomes)
- No Data



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CA HCD

Figure 48251. Access to Education



## 4.6.2 Economic

According to recent Census data, approximately 70 percent of the City’s working residents were employed in management and professional occupations. A low percentage of workers (less than 5 percent) were employed in service-related occupations such as waiters, waitresses, and beauticians. Blue collar occupations, such as machine operators, assemblers, farming, transportation, handlers, and laborers, constituted less than 5 percent of the workforce. In the Southern California Association of Governments region, approximately 34.2 percent of working residents were employed in management and professional occupations, followed by sales at 22.8 percent.

**Figure 262, Economic Opportunity**, shows the region’s access to economic opportunity considering the following indicators: poverty, adult education, employment, job proximity, and median home value. The City, along with other coastal cities, have a “more positive” TCAC Opportunity Area economic outcome score (greater than 0.75), and South Bay cities to the east have varying scores, including some tracts scoring less than 0.25, or “less positive” outcomes. Most Gateway Cities have a greater number of tracts indicating less-positive outcomes when compared to cities in the South Bay and Westside,<sup>15</sup> with the exception of the location of LAX and the Chevron refinery.

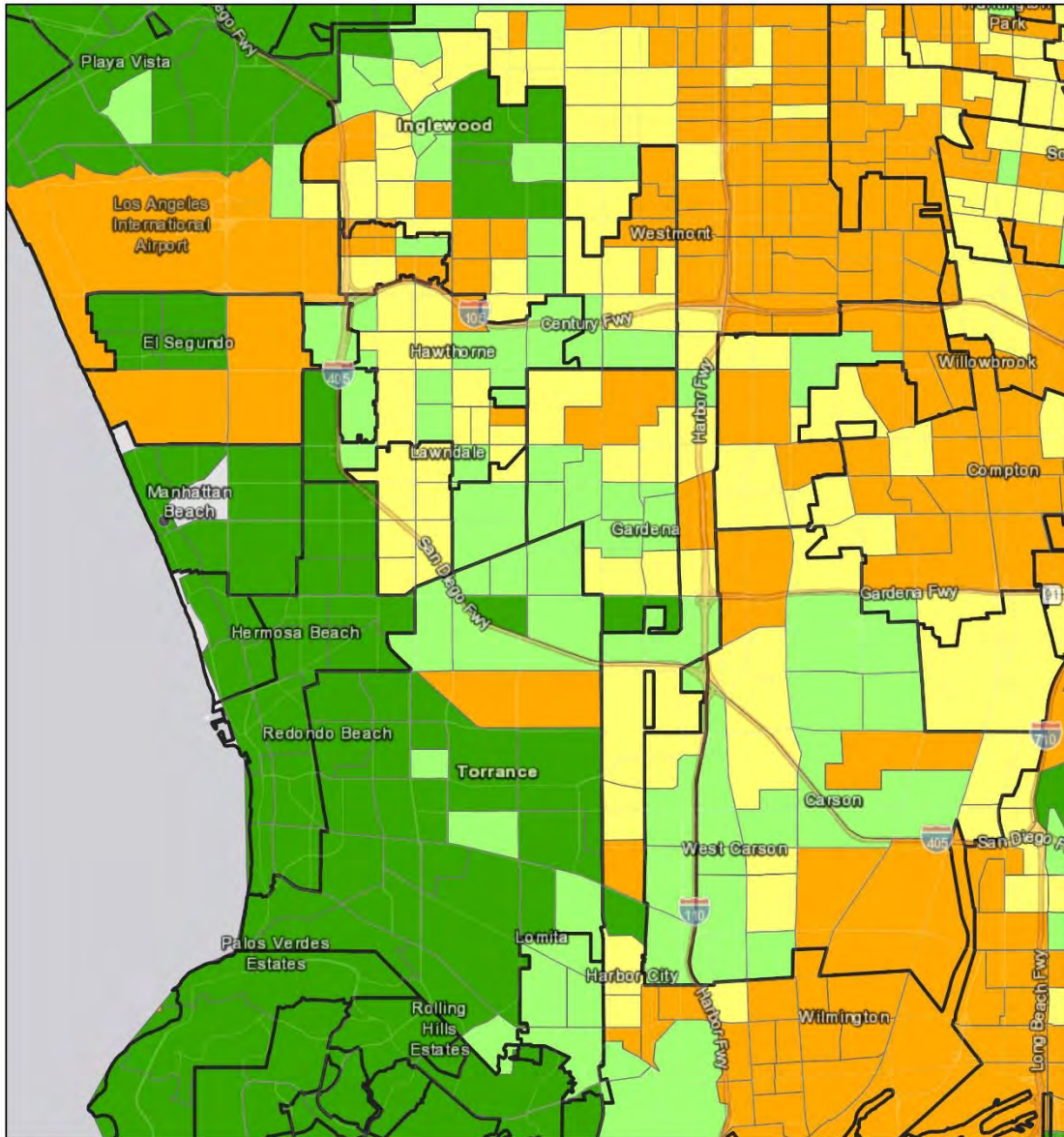
According to recent Census data, about 93 percent of employed City residents worked in Los Angeles County, but only 23 percent of all workers were employed within City limits. [Additionally, local data shows that approximately 30% of Manhattan Beach residents in the workforce, work in the City of Los Angeles, while approximately 8% work in Manhattan Beach and nearly 8% in El Segundo. -Approximately 67% of Manhattan Beach residents in the workforce earn more than \\$3,333 per month.](#) Access to economic opportunity in terms of proximity to jobs is shown in **Figure 273, Jobs Proximity**. **Figure 2273** indicates that the City is in proximity to jobs and has an index score of greater than 80 (closest proximity) in the central and northern areas, and the southern boundary of the City has an above-moderate score of 60 to 80. The coastal cities, with the exception of Palos Verdes Estates, and other South Bay and Gateway Cities areas indicate closest proximity to jobs. Key industries in the South Bay are in aerospace, technology, global communications, medicine, military, and business application. In recent years, Westside and South Bay cities have seen an increase in startup and technology companies—such as Hulu, Postmates, Snapchat, and Google—establishing their headquarters or an office in the cities of Santa Monica, Playa Vista, Venice, and El Segundo. In addition to the aforementioned industries, other key industries in Los Angeles County include fashion, apparel, and lifestyle; food manufacturing; advanced transportation; information technology; trade and logistics; and marketing, design, publishing.<sup>16</sup>

While the City has positive economic outcomes and close job proximity relative to other South Bay cities, a regionally scaled map provides context as to why this is. Better economic outcomes may correlate to higher median income, areas with significant White populations, and where non-single or married-couple households are prominent. This juxtaposes the lower economic outcomes of eastern South Bay, Westside, and Gateway cities where much of the population have a lower household median income, are significantly non-White, and are single income. Job proximity bears no correlation to the

<sup>15</sup> “Westside” is a local term used to reference cities generally west of downtown Los Angeles. For a full list of cities, see <https://laedc.org/wtc/chooselacounty/regions-of-la-county/westside/>.

<sup>16</sup> Los Angeles County Economic Development Corporation; <https://laedc.org/industries/overview/>.

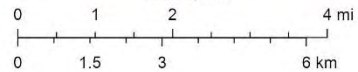
previously described factors as it varies across all incomes, demographics, and households. The City just so happens to be within range of LAX, where much of the jobs in the region are located near, making it more desirable for economic reasons.



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City/Town Boundaries



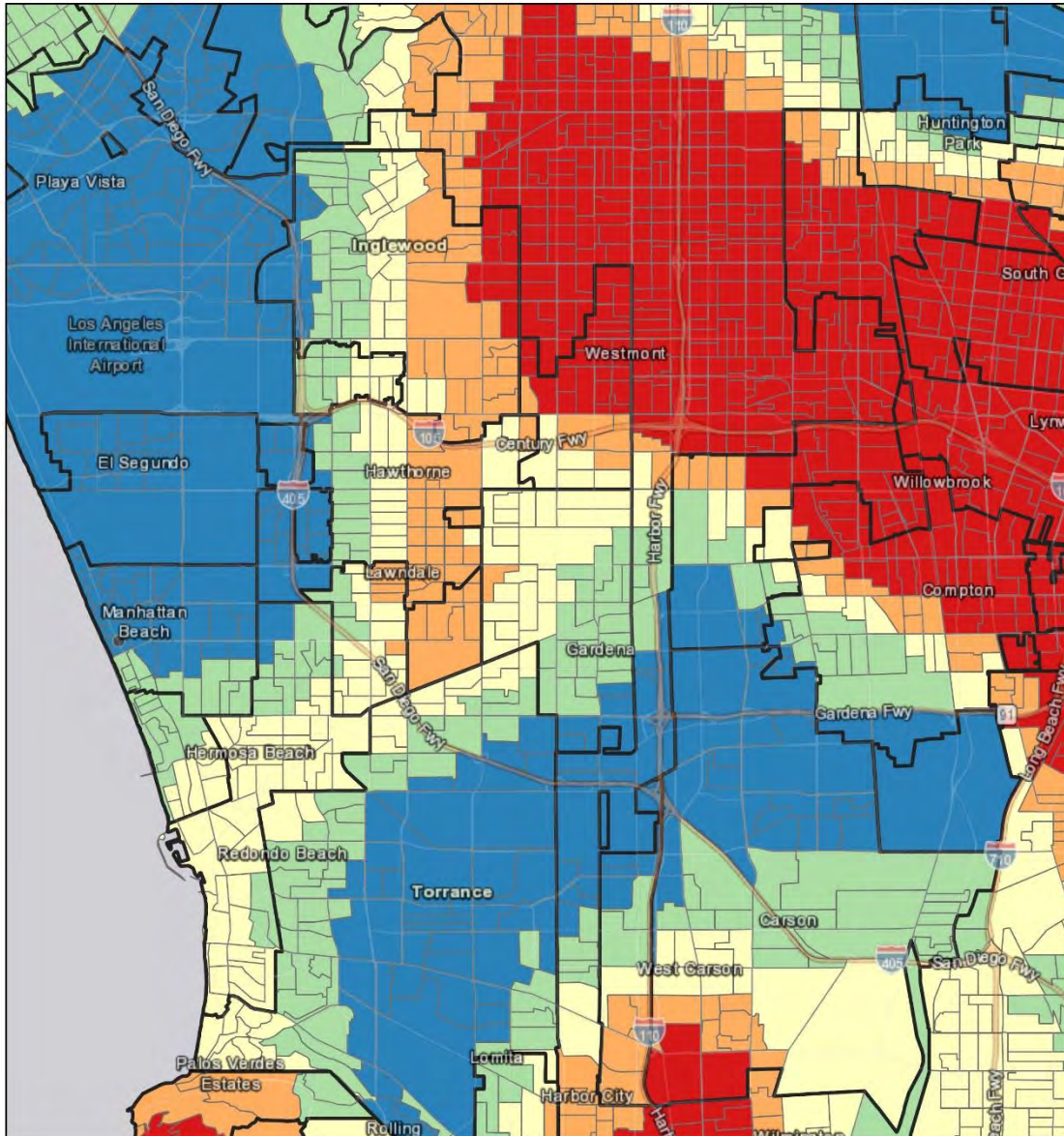
(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

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Figure 262. Economic Opportunity



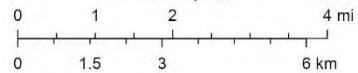
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City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)



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Figure 20273. Jobs Proximity

### 4.6.3 Transportation

Access to consistent, efficient, and varied modes of transportation is important, especially for persons without access to a personal vehicle. **Figure 28421, Access to Transportation**, displays various modes of transportation, pedestrian and bicycle paths, and “High Quality Transit Areas” in the Southern California Association of Governments’ jurisdiction. The majority of the pedestrian and bicycle paths are found in the western area of the City, near the beach areas. Bus services connect the areas north and south, as well as east and west along the main commercial corridors. The nearest light rail line operates outside of the City’s boundaries in El Segundo and Lawndale. The northeastern corner of the City, which is made up of commercial uses, falls within a High-Quality Transit Area due to its proximity to the Green Line. **Figure 295, Regional Access to Transportation, displays where Manhattan Beach is connected to surrounding areas, including key areas of employment such as Torrance to the southeast and Los Angeles, El Segundo and Playa Del Rey to the north. Regional transit options offer high access to employment opportunity for those without a vehicle, including lower-income households that may not be able to afford a vehicle and those that physically may not be able to drive. Local data shows that that approximately 30% of Manhattan Beach residents in the workforce, work in the City of Los Angeles, while approximately 8% work in Manhattan Beach and nearly 8% in El Segundo. Approximately 42% of Manhattan Beach residents in the workforce travel less than 10 miles for work. Various modes and options for transportation vary throughout the region. Pedestrian and bicycle options are mainly found near recreational areas and along beaches. Public transit and high-quality transit areas correlate to areas with lower median income, single income households, and are located far from jobs. The City has few transit options, however, it can be inferred that residents with higher median income are more likely to own personal vehicles or are located near amenities and jobs.**

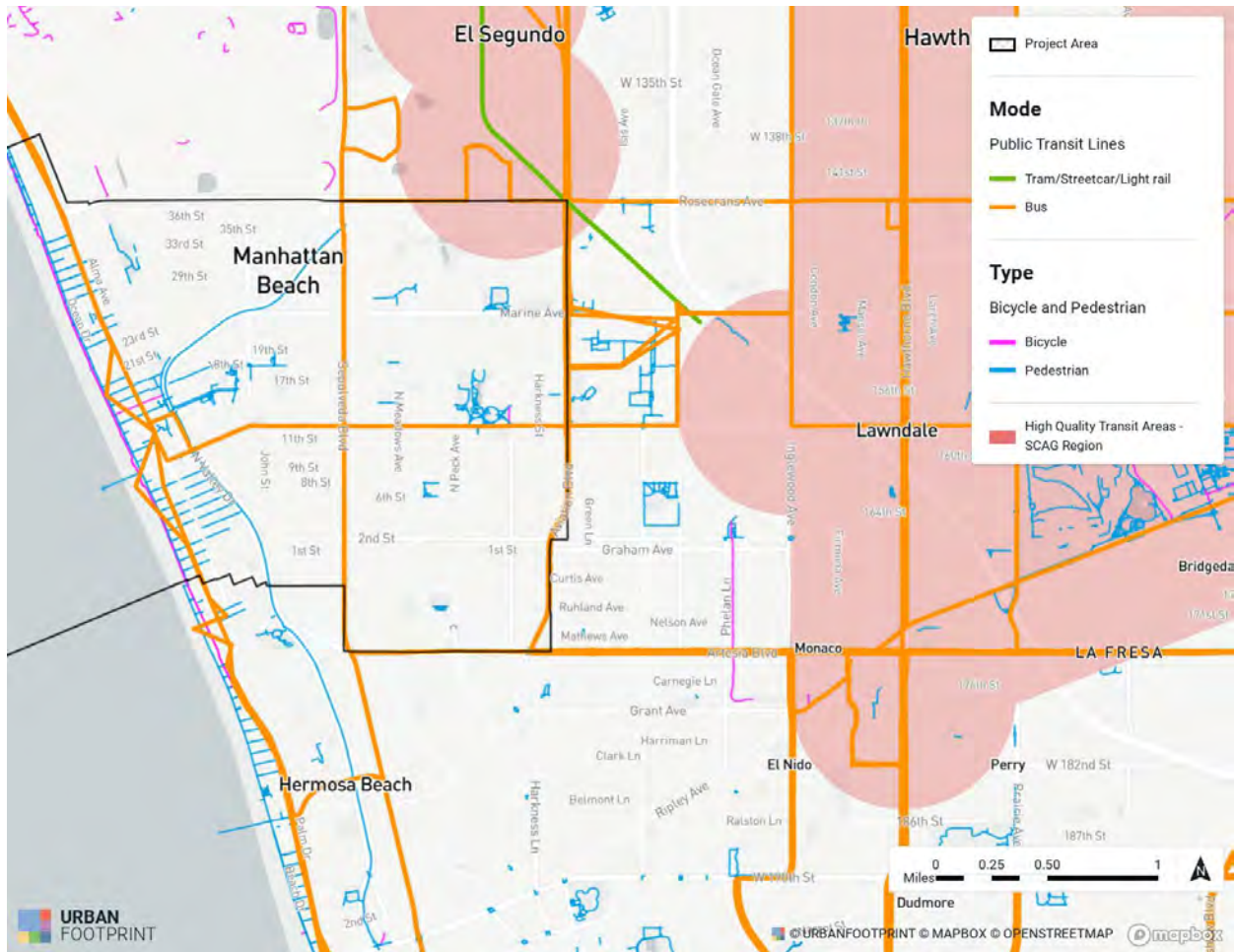


Figure 24284. Access to Transportation

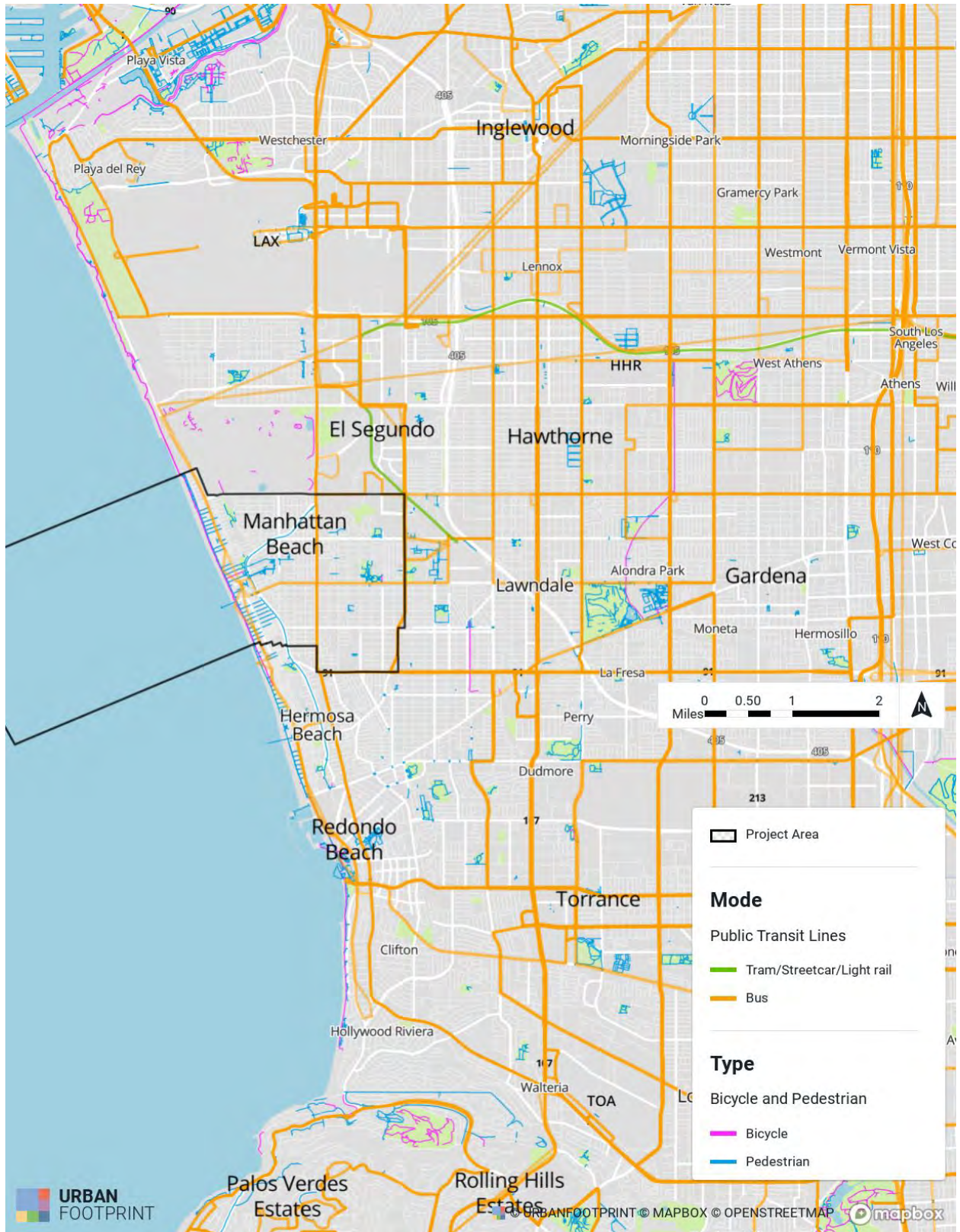


Figure 295. Regional Access to Transportation

#### 4.6.4 Environment

Access to a clean and healthy environment plays an important role in maintaining adequate quality of life. Air pollution, water quality, access to open spaces, and vegetation are among the environmental factors that are weighted in different health indices that attempt to show levels of environmental quality. **Figure 223026, Opportunity for Environment**, shows the opportunity for access to environmentally healthy neighborhoods. As shown in **Figure 3022**, the southern area of the City is considered to be in a more positive TCAC Opportunity Area outcome range (0.75–1). The tract in the northwest area indicates moderate environmental outcomes (0.5–0.75), and the northeast area indicates less-positive environmental outcomes (less than 0.25). The coastal areas have higher environmental outcome scores, with the exception of LAX, the Chevron refinery, and their surrounding neighborhoods. At a regional scale, areas east of the City generally score in the moderate to above-moderate positive environmental outcomes. Tracts that abut a highway or are made up of industrial or manufacturing uses, such as portions of Torrance, score in the less-positive outcomes range. There may be a tradeoff between positive environmental outcomes and close job proximity. When comparing the environmental opportunity map to Figure 27, Jobs Proximity, areas that are furthest from jobs tend to have better environmental opportunity. Economic hubs like LAX and Torrance have less positive environmental outcomes, which may explain why northern tracts of the City that are closer to LAX may have a less positive score. Environmental outcomes have little influence on factors like income, household, and demographics as Inglewood and Coastal cities both have positive environmental outcomes despite having differing socio-economic characteristics.

**Figure 312623, CalEnviroScreen 3.0**, indicates that the majority of the City ranks in the 1 to 10 percentile range, meaning that residents have low exposure to pollutants. The southeastern area of the City ranks in the 15 to 20 percentile, which is also considered a low score. Some specific factors that are particularly detrimental to residents of this areas as identified by CalEnviroScreen are the following:

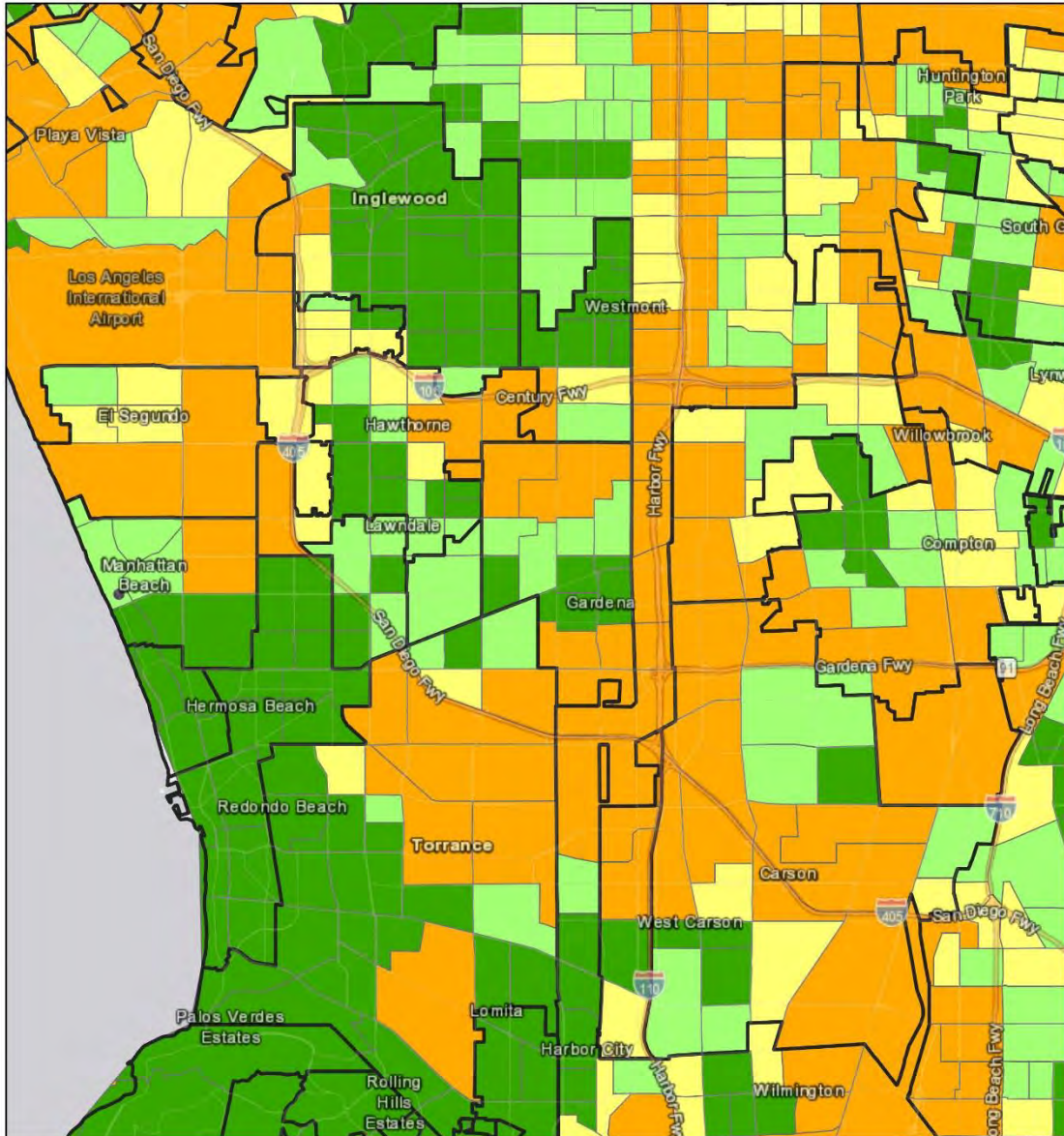
- Fine Particulate Matter: Particulate matter, one of six U.S. Environmental Protection Agency criteria air pollutants, is a mixture that can include organic chemicals, dust, soot, and metals. These particles can come from cars and trucks, factories, wood burning, and other activities. Fine particle pollution has been shown to cause many serious health effects, including heart and lung disease.
- Toxic Releases: Facilities that make or use toxic chemicals can release these chemicals into the air. People living near facilities may breathe contaminated air regularly or if contaminants are released during an accident. The local area with the relatively higher exposure to pollutants has a Toxic Release Percentile of 79. The following are nearby toxic release facilities:
  - Chevron Products Co Division of Chevron USA Inc.
  - Northrop Grumman Aerospace Systems
- Hazardous Waste: Waste created by commercial or industrial activities contains chemicals that may be dangerous or harmful to health. Only certain regulated facilities are allowed to treat, store, or dispose of this type of waste. These facilities are not the same as cleanup sites. Hazardous waste includes a range of different types of waste, such as used automotive oil and highly toxic waste materials produced by factories and



businesses. The local area with a relatively higher exposure to pollutants has a Hazardous Waste Percentile of 74. The following are nearby generators of hazardous waste:

- Air Products Manufacturing Corporation
- Honeywell El Segundo Site
- Target Store T0199
- West Basin Municipal Water District DBA Edward C Little Water Treatment

Other health indicators to consider when analyzing access to environmental opportunity include access to healthy food choices and access to medical services. Local data identified three census tracts in the City where up to 22.7 housing units per tract located east of Ardmore Avenue and south of Manhattan Beach Boulevard, as well as north of Ardmore Avenue and east of Bell Avenue are receiving benefits from the Supplemental Nutrition Assistance Program (SNAP). Low food access was also identified for these tracts based on a half mile demarcation to the nearest supermarket and vehicle access. Local data also indicates that the City has poor access to medical services such as hospitals, with the exception of local clinics. The nearest hospitals are located in the cities of Hawthorne and Torrance and are located more than a mile away from the City's outer boundaries. Local data indicates



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City/Town Boundaries

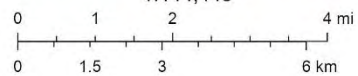
(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

< .25 (Less Positive Environmental Outcomes)

.25 - .50

.50 - .75

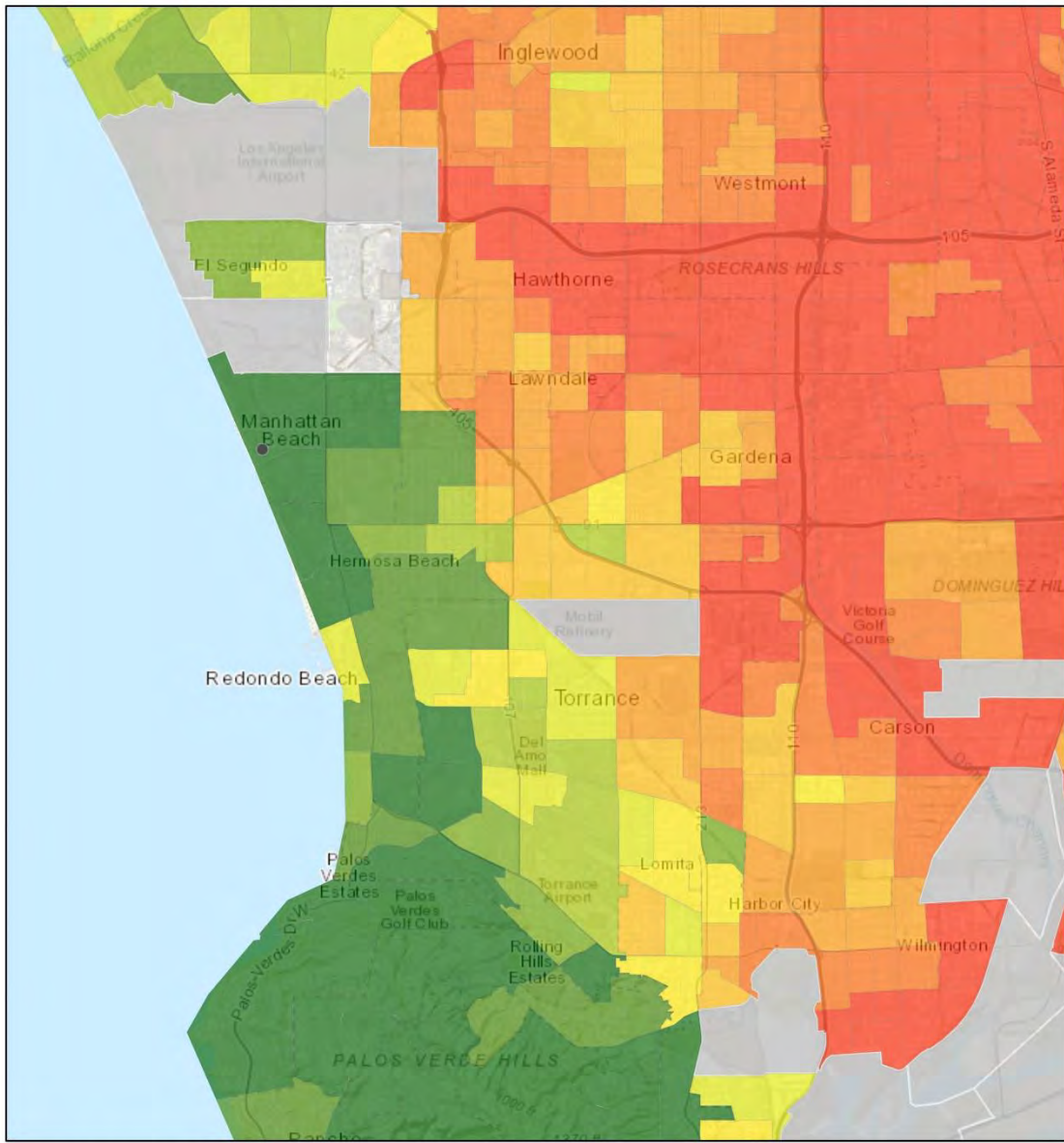
.75 - 1 (More Positive Environmental Outcomes)



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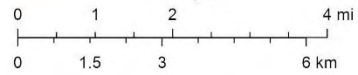
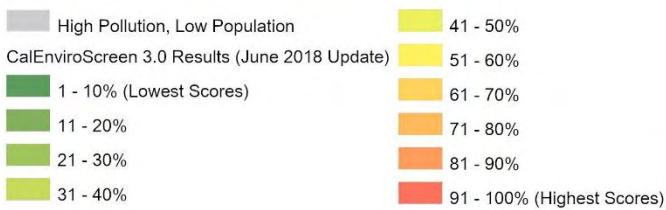
CA HCD  
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure 302622. Opportunity for Environment



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Figure 31237. CalEnviroScreen 3.0

#### 4.6.5 Persons with Disabilities

Trends related to persons with disabilities, including local and State analysis of prevalence of disabilities by type and age group, are included in Appendix B. The Needs Assessment also covers services that are offered for persons with disabilities. Some common zoning barriers for persons with disabilities include the following:

- Reasonable Accommodation Procedure
  - Common issues with reasonable accommodation procedures include excessive findings of approval, burden on applicants to prove the need for exception, application costs, and discretionary approvals.
- Family Definition
  - Family definitions in zoning or other land use–related documents can directly impact housing choices for persons with disabilities, particularly regarding group home situations, which are commonly used by persons with disabilities. Regulating the number of people or requiring occupants to be related can be common elements in family definitions that create barriers.
- Excluding Residential Care Facilities
  - Excluding residential care facilities or subjecting these homes to a Conditional Use Permit in single-family zones acts as a barrier to housing choice for persons with disabilities.
- Spacing Requirements
  - Excessive spacing requirements between group homes or community or residential care facilities can directly impact the supply of housing choices for persons with disabilities.
- Unit Types and Sizes
  - The lack of multifamily housing or zoned capacity for multifamily housing and a variety of sizes, from efficiency to four or more bedrooms, can constrain the ability of persons with disabilities to live in a more integrated community setting.
- Lack of By-Right Zoning for Supportive Housing<sup>17</sup>
  - By-right zoning for supportive housing can result in more objective processes that are less likely to discriminate or have the effect of discriminating against persons with disabilities.

The City provides a reasonable accommodations procedure according to State law. Furthermore, the Manhattan Beach Municipal Code’s definition of “family” is in compliance with State requirements, as it does not require a certain relationship among the members, nor does it limit the size or specify other characteristics. Therefore, the definition of “family” does not constrain or limit development of residential

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<sup>17</sup> “Supportive housing” means housing with no limit on length of stay that is occupied by the target population and that is linked to an on-site or off-site service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (Government Code 65582).

care facilities or other specialized housing for unrelated individuals or those with disabilities or special needs. “Supportive Housing” under the Manhattan Beach Municipal Code is considered a residential use and is subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone. A potential barrier for persons with disabilities is access to multifamily housing, as there is a lack of variety of housing types in the City. According to California Department of Finance 2019 Population and Housing Unit Estimates, 77.2 percent of housing units in the City are single-family residential detached or attached, 16.3 percent are two- to four-unit multifamily, and 6.4 percent are multifamily with five or more units. Approximately 400 acres of land are zoned to allow for multifamily development, and 1,497 acres are zoned to allow for single-family residential. Although multifamily is permitted in most zones that allow residential uses, most of these zones also allow for single-family residential. Refer to **Appendix C, Constraints and Zoning Analysis**, for a detailed summary of zones, allowable uses, and development standards. The Single-Family Residential Zoning District (RS), which does not allow for multifamily development, accounts for 73 percent of the 1,497 acres zoned to allow for single-family residential. Under HCD’s guidance, Zoning Barriers for Persons with Disabilities, zoning capacity for multifamily residential is considered a barrier for multifamily development. Previously shown in Figure 13, Population with a Disability, areas with increasing percentage of population with a disability are located to the east near Gateway cities and Southeast Los Angeles. This correlates to areas where there is more diversity, median household income is lower, and where single-income households are common. As a result, the lower percentage of population with a disability in the City may be due to multiple factors which could include the high cost of housing, the fact that housing and a lack of opportunities for those with disabilities, or higher incomes may correlate to better medical care which could decrease the likelihood of having a disability, among other factors. ~~is scarce and unlikely.~~

## 4.7 Disproportionate Housing Needs and Displacement Risk

Homeownership is one of the largest assets for most households in the United States, and, for many households, provides a significant opportunity to build wealth. Over generations, many households have used wealth gained through homeownership to send their children to college or invest in other opportunities, creating access to more wealth. One of the most prevalent consequences of residential segregation is the intergenerational inaccessibility of homeownership.<sup>18</sup> According to the Census, 9,344 households (69.6 percent) in the City were owner-occupied in 2019, and 4,083 units (30.4 percent) were renter-occupied. The homeownership rate within the City is higher than the County’s homeownership rate of 45.8 percent, and the renter-occupancy rate is lower than the County’s rate of 54.2 percent.

Generally, persons with protected characteristics, including minority households, and renter households are more likely to experience higher rent burdens and poor housing conditions, such as lack of plumbing or kitchen facilities, or to experience overcrowding. These populations also have an increased risk of displacement and/or homelessness. Although the City has high ownership rates and a small population of minority households, this section assesses disproportionate housing needs, including displacement risk, with a focus on people with protected characteristics.<sup>19</sup> Disproportionate housing needs are based on

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<sup>18</sup> Disparities in Wealth by Race and Ethnicity in the 2019 Survey of Consumer Finances, 2020.

<https://www.federalreserve.gov/econres/notes/feds-notes/disparities-in-wealth-by-race-and-ethnicity-in-the-2019-survey-of-consumer-finances-20200928.htm>.

<sup>19</sup> “Protected Characteristics” under the Fair Housing Act includes race, color, national origin, religion, sex, familial status, and disability.

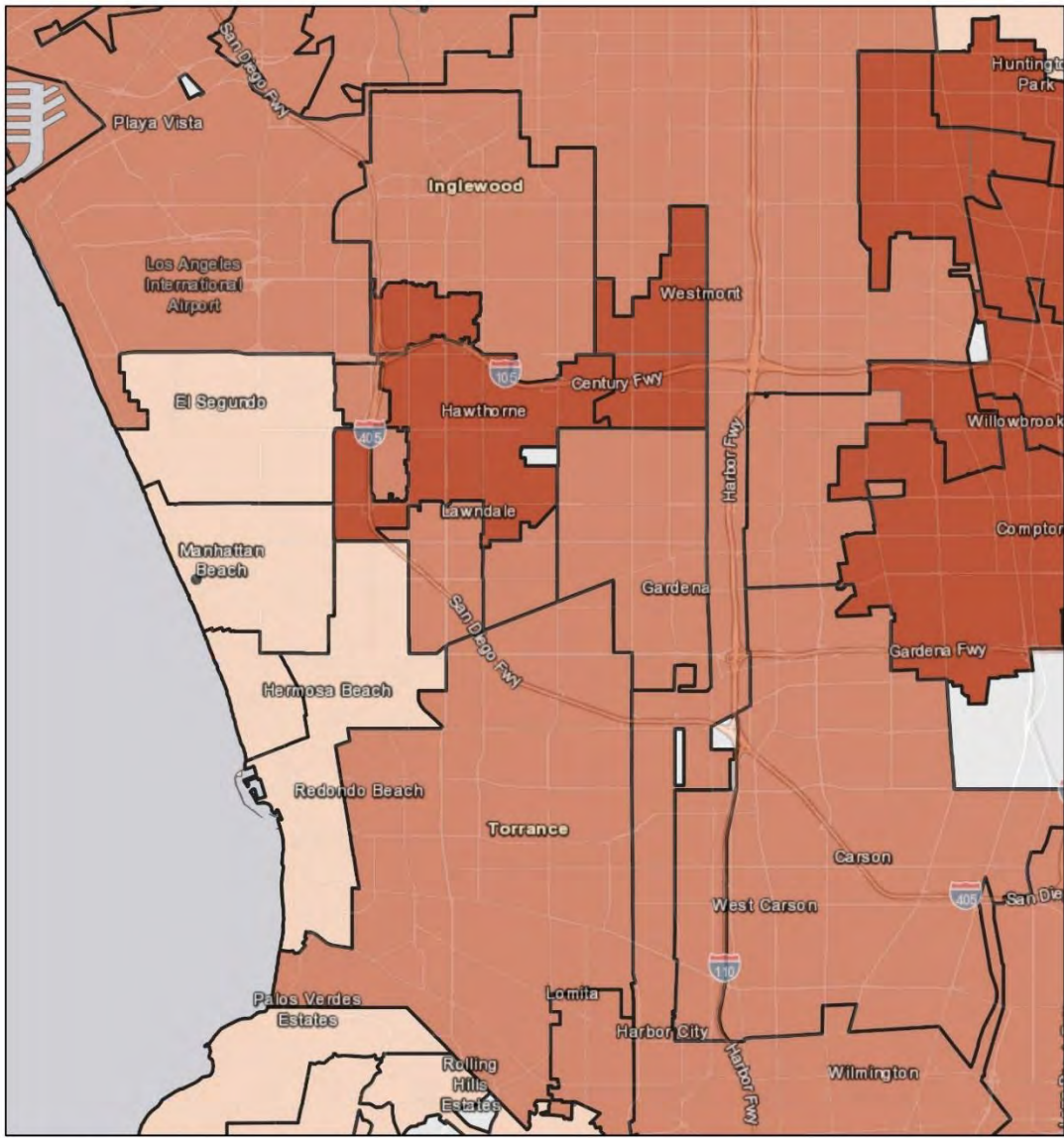
factors such as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.

#### 4.7.1 Substandard Housing

White, non-Hispanic households across the region and in each jurisdiction are the least likely to experience housing problems, and Black and Hispanic households experience housing problems at the highest rates. Substandard housing problems include households without hot and cold piped water, a flush toilet, and/or a bathtub or shower, and households with kitchen facilities that lack a sink with piped water, a range or stove, and/or a refrigerator. **Figure 24-328, Substandard Housing**, shows the percent of all households with any of the four severe housing problems identified in HCD AFFH mapping tool:

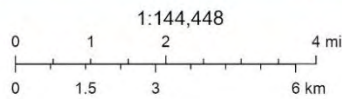
- Lack of a complete kitchen
- Lack of complete plumbing
- Severely overcrowded
- Severely cost burdened

**Figure 24-32** indicates that less than 20 percent of total households in the City have any of the four severe housing problems. Abutting cities to the north and south also have less than 20 percent of all households with substandard housing. The map indicates that cities to the east have higher percentages of households that experience any of the four severe housing problems, specifically in the 20 percent to 40 percent category, and some have 40 percent to 60 percent of households experiencing substandard housing problems.



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City/Town Boundaries



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City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks

**Legend**

City/Town Boundaries



(A) Percent of all households with any of the 4 severe housing problems (lacks complete kitchen, lacks complete plumbing, severely overcrowded, severely cost-burdened) - (ACS, CHAS) - City Level

Percent of all households with any of the 4 severe housing problems

- > 80%
- 60% - 80%
- 40% - 60%
- 20% - 40%
- < 20%

Figure 24.3228. Substandard Housing

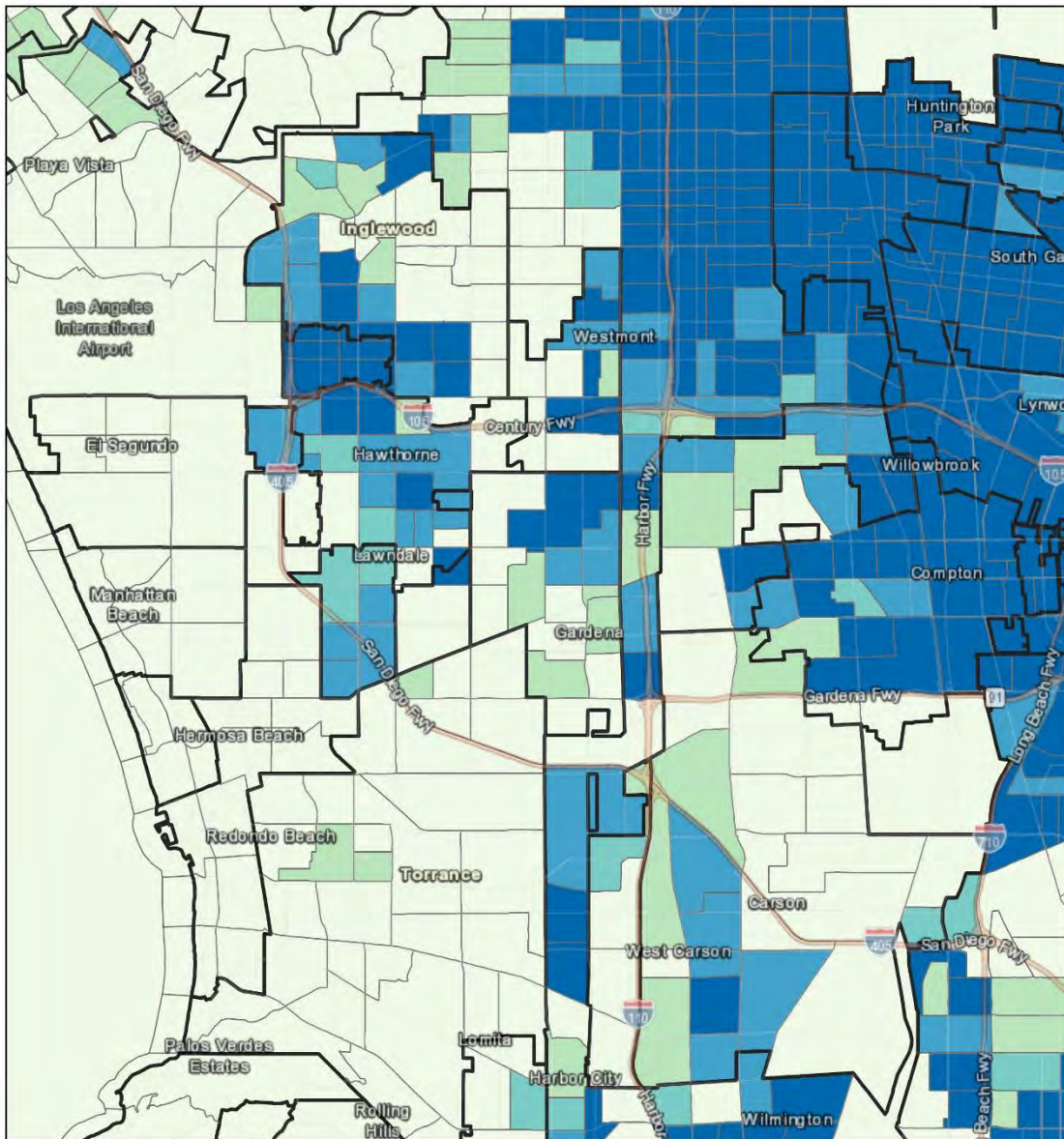
## 4.7.2 Overcrowding

Residential crowding is used to reflect demographic and socioeconomic conditions. Immigrant communities, low-income families, and renter-occupied households are more likely to experience overcrowding.<sup>20</sup> Overcrowding is defined by the U.S. Census Bureau as a housing unit occupied by more than one person per room. A severely overcrowded household is defined as having more than 1.5 persons per room. In this definition, “room” includes living rooms, dining rooms, and bedrooms, but does not include the kitchen or bathrooms. In the City, the percent of overcrowded and severely overcrowded households is less than or equal to 8.2 percent (see **Figure 253329, Overcrowding**, and **Figure 26340, Severe Overcrowding**). The region has a similar pattern of overcrowding and severe overcrowding, where the coastal cities experience low percentages and the cities to the east experience higher percentages. The areas of Westmont, Willowbrook, and Compton, as well as other cities in the Gateway Cities area, experience higher percentages of overcrowding (**Figure 253329**).

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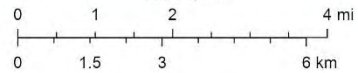
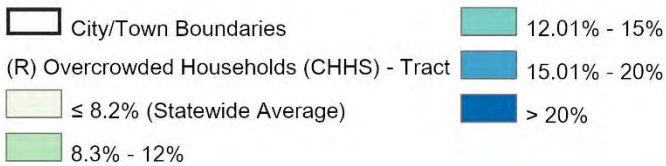
<sup>20</sup> <https://data.chhs.ca.gov/dataset/housing-crowding>





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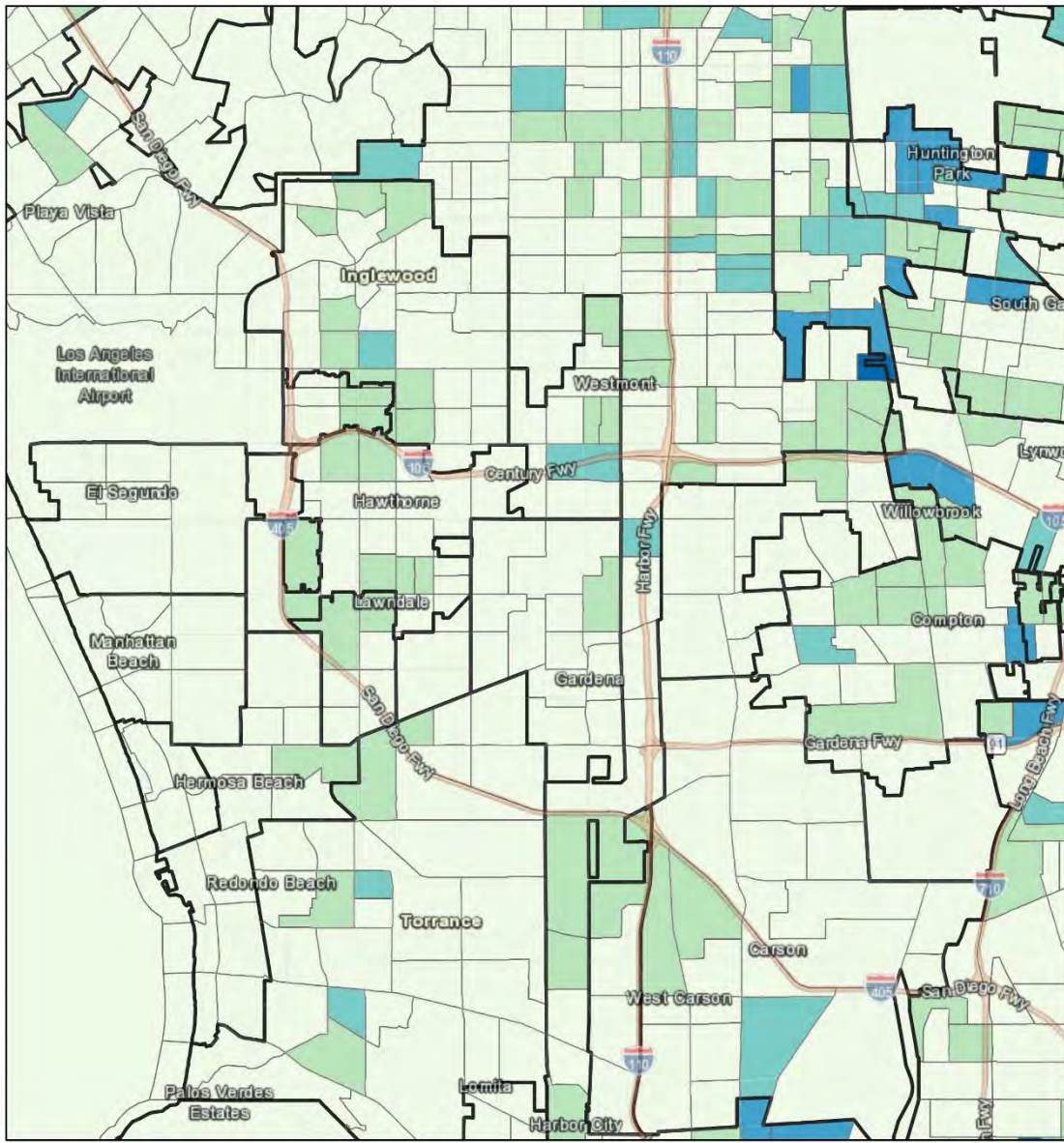
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CA HCD  
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

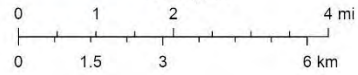
Figure 253329. Overcrowding



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- City/Town Boundaries
- (R) Severely Overcrowded Households (CHHS) - Tract
- ≤ 5%
- 5% - 20%
- 20% - 35%
- 35% - 65%
- > 65%



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Figure 26340. Severe Overcrowding

### 4.7.3 Housing Affordability

According to the Federal government, rental housing is considered “affordable” if the people living there pay no more than 30 percent of their income for housing (rent or mortgage). As identified in Appendix B, approximately 84 percent of lower-income renter households and 55 percent of lower-income owner occupied households ~~were overpayingoverpay~~ for housing.; Approximately 70 percent of moderate-income renter households and 51 percent of moderate-income owner occupied households ~~were overpayingoverpay~~ for housing. Approximately; ~~and~~ 15 percent of above moderate-income renter households and 18 percent of above moderate-income owner households ~~were overpayingoverpay~~ for housing. This indicates that lower-income households are disproportionately burdened by the cost of housing, especially lower-income renters.

Although the median household income in the City is \$153,023, the average salary for jobs in the City is \$67,947. Persons who work in the City may not be able to live in the City since the cost of living is relatively high when compared to the region. According to the Zillow Home Value Index, August 2021 estimates, the median home value in the City is \$2,923,949. The median rent for a one-bedroom unit is \$2,410, for a two-bedroom unit is \$3,090, for a three-bedroom unit is \$4,110, and for a four-bedroom unit is \$4,480.<sup>21</sup> The Fair Market Rent<sup>22</sup> for the Los Angeles–Long Beach area is relatively lower than rent in the City; for the 2021 fiscal year, a one-bedroom unit was estimated at \$1,605, a two-bedroom unit was estimated at \$2,058, a three-bedroom unit was estimated at \$2,735, and a four-bedroom unit was estimated at \$2,982. Moderate- and above-moderate-income households are also cost burned.

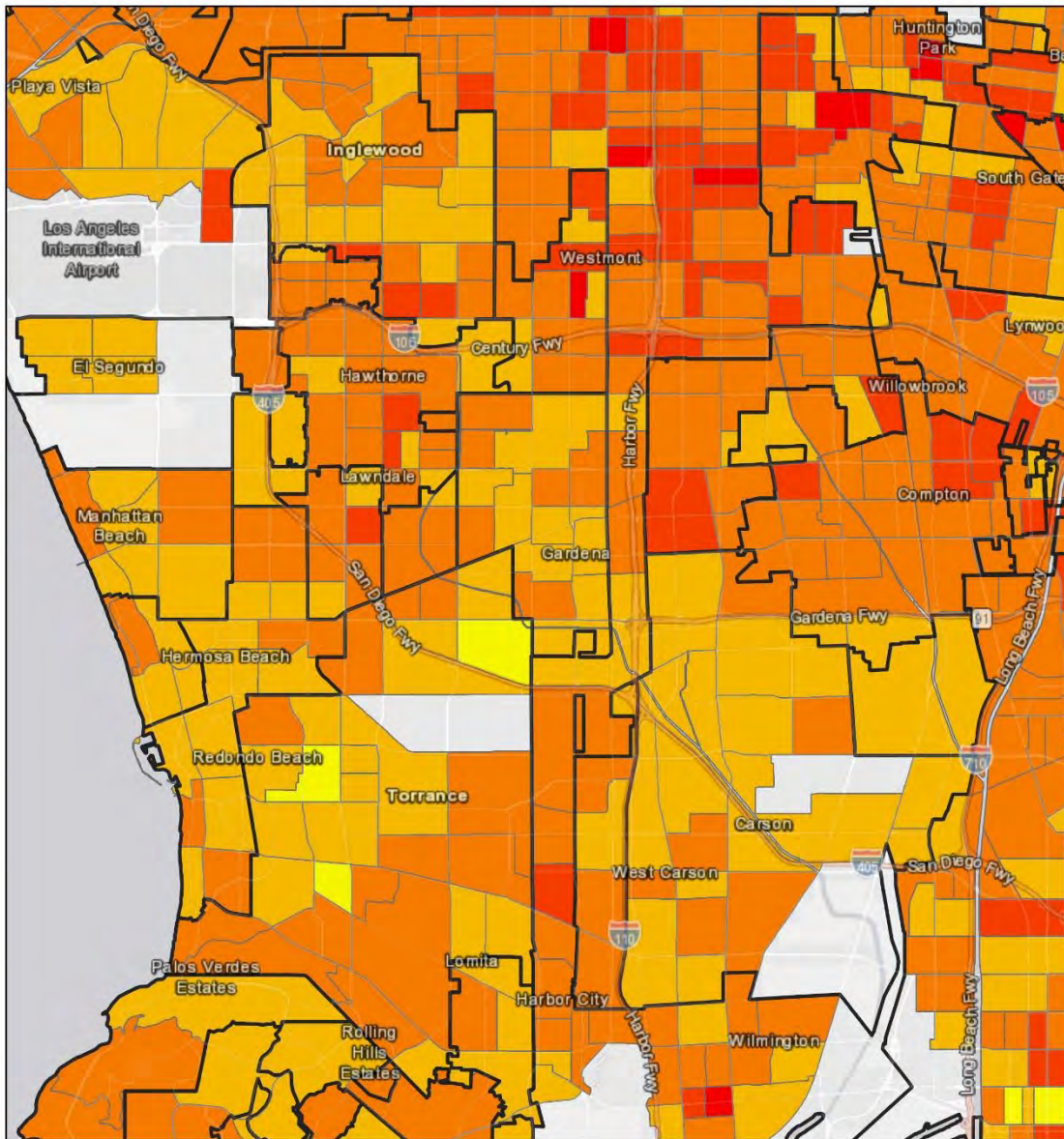
The high cost of living in the City can be seen in **Figure 27A351A, Homeowner Cost Burden (2015-2019)**, with tracts indicating 20 percent to 40 percent and 40 percent to 60 percent of owner households whose mortgages are more than 30 percent of the median household income. The highest level of homeowner overpayment in the City is located in the western boundary, abutting the coast, and the northeast corner. As evident by Figure 27364, Homeowner Cost Burden (2010-2014), homeowner overpayment was the same for the previous five years. Although homeowner payment was higher for the general region. This indicates that the City is stable in regards to homeowner mortgages. The City, as well as many other coastal cities have a lower percentage of owner households whose mortgages are more than 30 percent of the median household income when compared to the region. Areas closer to South Los Angeles and Gateway cities bear a higher burden as overpayment by homeowners may reach more than 60 percent and up to over 80 percent.

Renters in the City have varying percentages of the cost burdened population (**Figure 28A372A, Renter Cost Burden**). The southeastern, central, and northwestern areas of the City experience 20 percent to 40 percent cost burden; in the northeastern area renters experience the highest level of cost burden in the City at 40 percent to 60 percent. The lowest percent of renter households who experience overpayment, less than 20 percent of households, is located in the southwestern area of the City abutting Hermosa Beach. Coastal cities’ homeowner and renter households face similar trends, and cities to the east indicate a higher percentage of households experiencing homeowner and renter overpayment (see Figures 27A

<sup>21</sup> <https://patch.com/california/manhattanbeach/rent-estimates-manhattan-beach-area>

<sup>22</sup> The Department of Housing and Urban Development (HUD)-formulated Fair Market Rent (FMR) schedule serves as a guide for the maximum rents allowable for those units receiving Section 8 assistance. HUD uses the Consumer Price Index and the Census Bureau housing survey data to calculate the FMRs for each area.

and 28A). As shown in Figure 28382, Renter Cost Burden (2010-2014), renter households who experience overpayment was nearly the same as the previous five years with the cost burden increasing or decreasing in different tracts throughout the city. In general, Patterns over time show that renter households who experience overpayment is less than the previous five years for the region. In comparison to the region, renters in the City have a low cost burden relative to inland cities where cost burden can exceed 60 percent. This may be attributed to the pattern of wealth commonly associated with coastal cities in Los Angeles and across the state.



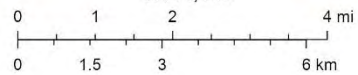
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City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

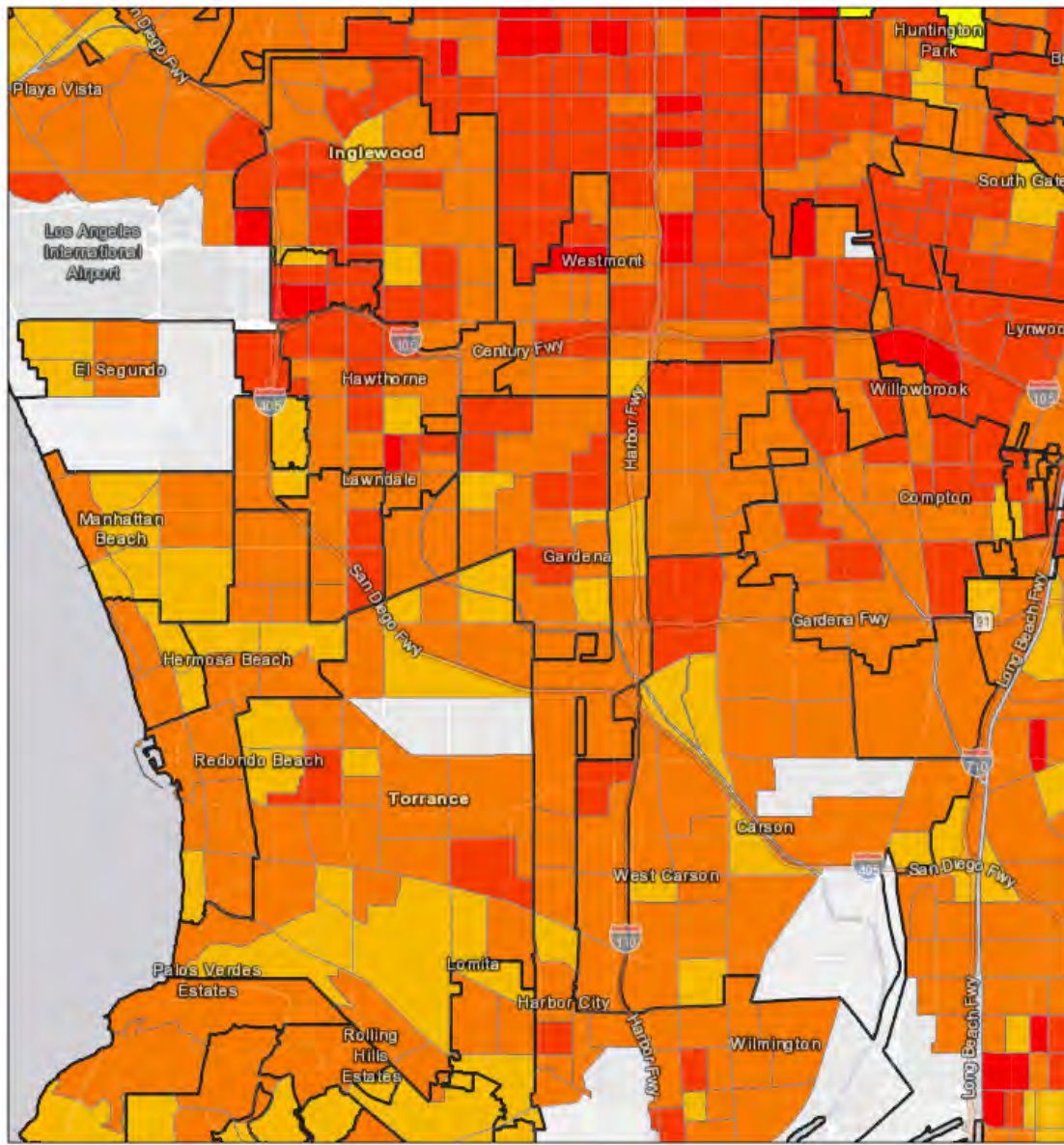
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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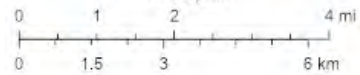
Figure 27A351A. Homeowner Cost Burden (2015-2019)



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City/Town Boundaries



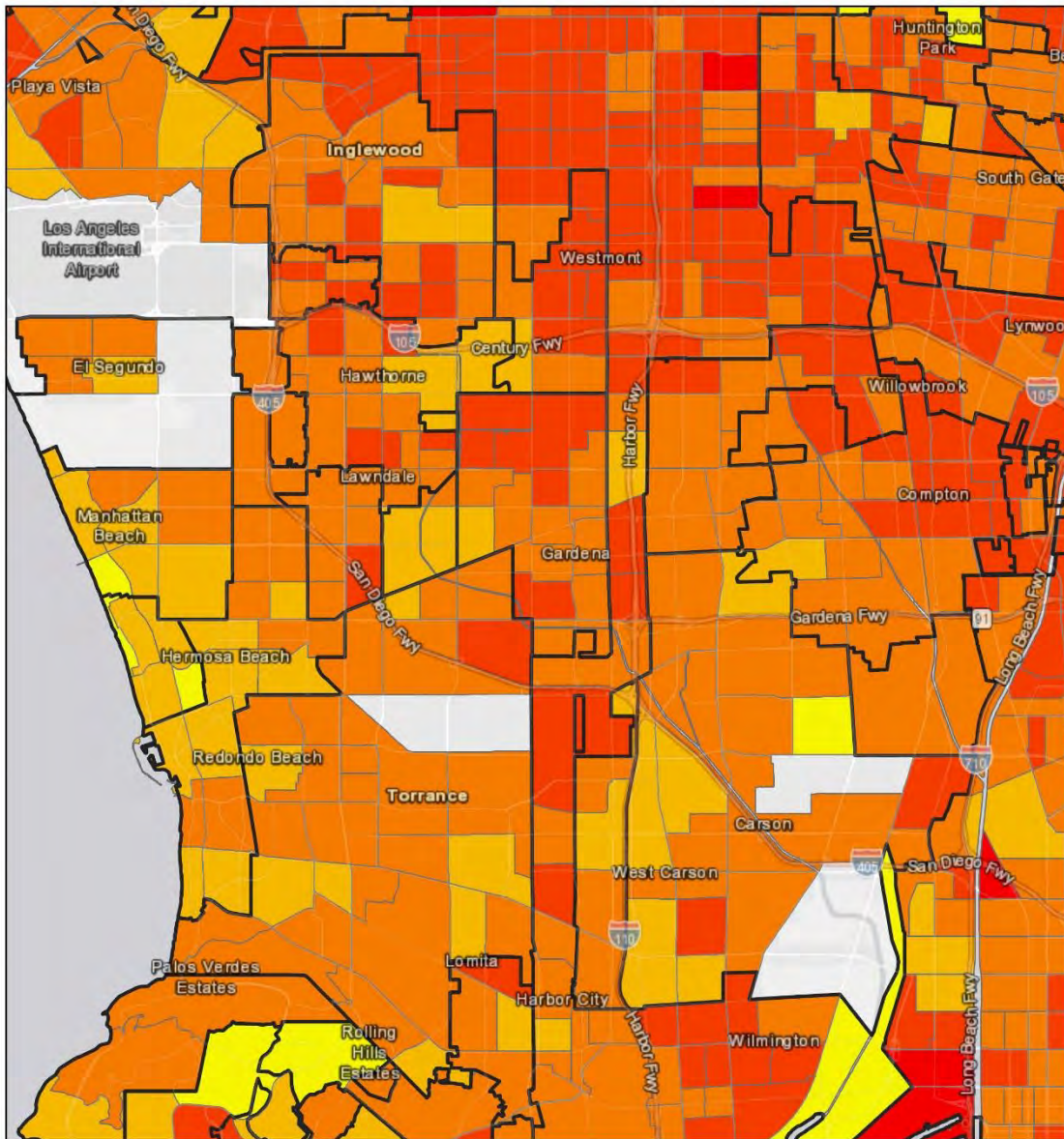
(A) Overpayment by Home Owners (ACS, 2010 - 2014) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. CA HCD

Figure 27361. Homeowner Cost Burden (2010-2014)



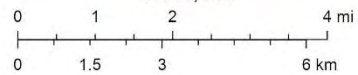
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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

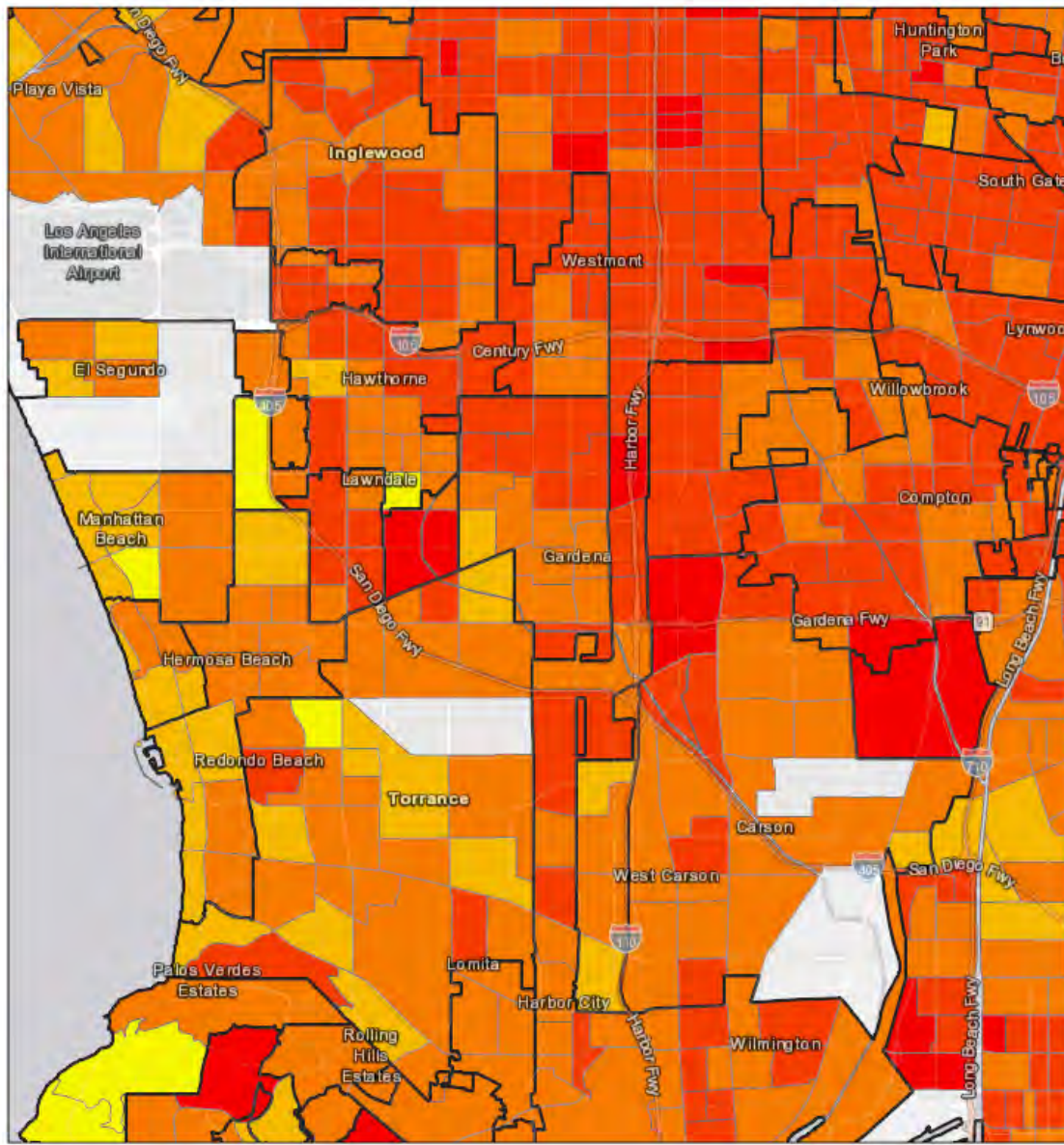
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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CA HCD  
County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure 37228. Renter Cost Burden (2015-2019)

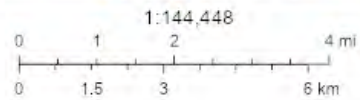


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City/Town Boundaries

(A) Overpayment by Renters (ACS, 2010 - 2014) - Tract ACS

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%



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County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S.

Figure 382. Renter Cost Burden (2010-2014)



#### 4.7.4 Displacement

Displacement is generally caused by disinvestment, new investment, or natural disasters. Gentrification, or the influx of capital and higher-income residents into working-class neighborhoods, is often associated with displacement, which occurs when housing costs or neighborhood conditions force people out and drive rents so high that lower-income people are excluded from moving in.

According to the Urban Displacement Project, a research collaboration between UC Berkeley and the University of California, Los Angeles, the City is considered “Stable/Advanced Exclusive” (see **Figure 29393, Displacement Map**). The criteria for “Stable/Advanced Exclusive” is as follows:

- High-income tract in 2000 and 2018
- Affordable to high or mixed high-income in 2018
- Marginal change, increase, or rapid increase in housing costs

Coastal cities fall into the following displacement typologies: Stable Moderate/Mixed Income, At Risk of Becoming Exclusive, Becoming Exclusive, and Stable/Advanced Exclusive. Other cities in the South Bay and Gateway Cities experience a mix of Stable Moderate/Mixed Income and At Risk of Becoming Exclusive, with pockets of Stable/Advanced Exclusive; however, the predominant displacement typology, specifically in the Inglewood, Gardena, Compton, and South Gate areas, are Low-Income/Susceptible to Displacement, followed by Advanced Gentrification, Early/Ongoing Gentrification, and At Risk of Gentrification. A list of the displacement typology and corresponding criteria can be found in **Figure 304034, Displacement Typology**.

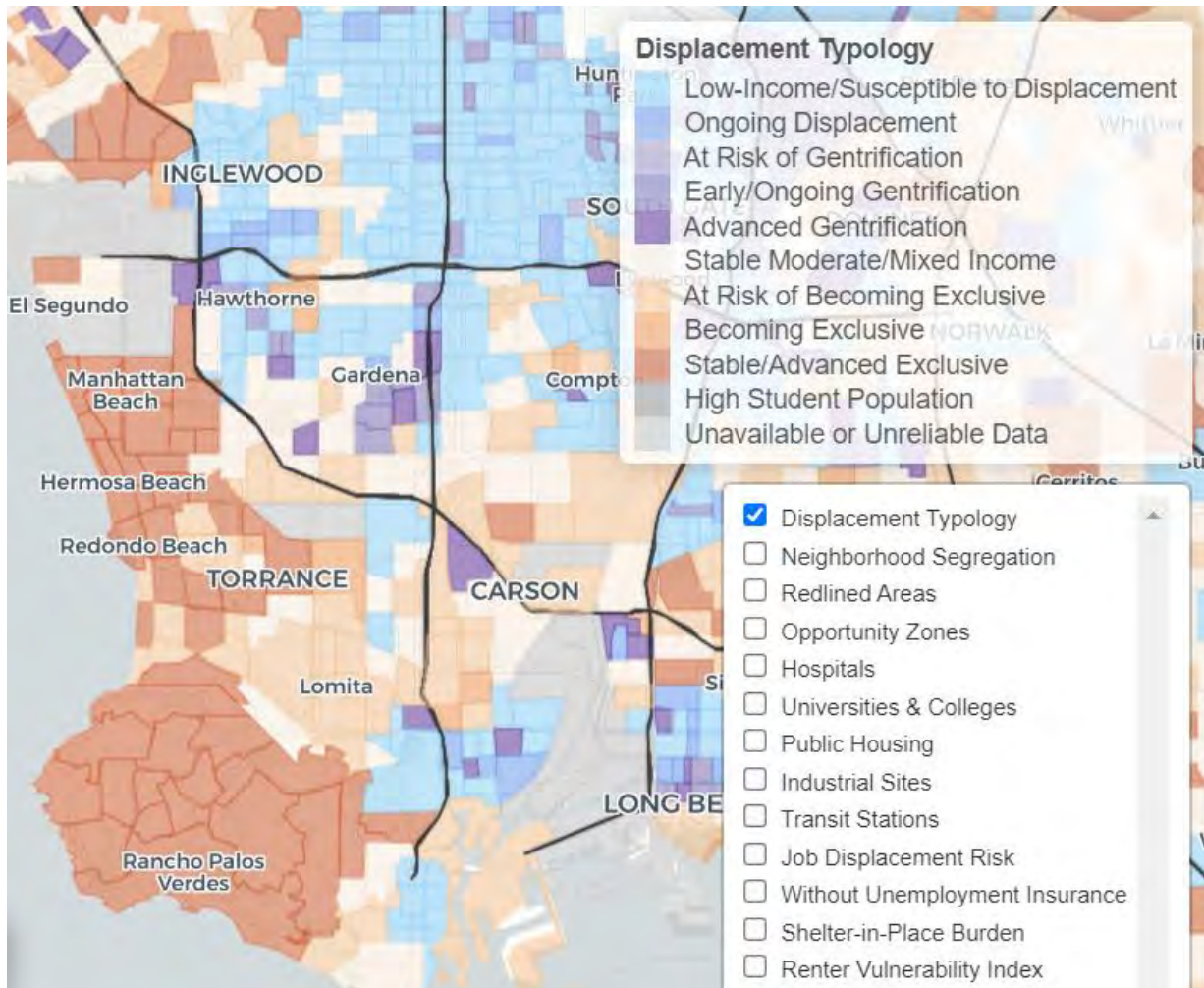


Figure 29393. Displacement Map

<b>MODIFIED TYPES</b>	<b>CRITERIA</b>
LOW-INCOME/SUSCEPTIBLE TO DISPLACEMENT	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018</li> </ul>
ONGOING DISPLACEMENT OF LOW-INCOME HOUSEHOLDS	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018</li> <li>• Absolute loss of low-income households, 2000-2018</li> </ul>
AT RISK OF GENTRIFICATION	<ul style="list-style-type: none"> <li>• Low-income or mixed low-income tract in 2018</li> <li>• Housing affordable to low or mixed low-income households in 2018</li> <li>• Didn't gentrify 1990-2000 OR 2000-2018</li> <li>• Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018</li> <li>• Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap</li> </ul>
EARLY/ONGOING GENTRIFICATION	<ul style="list-style-type: none"> <li>• Low-income or mixed low-income tract in 2018</li> <li>• Housing affordable to moderate or mixed moderate-income households in 2018</li> <li>• Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2012-2018</li> <li>• Gentrified in 1990-2000 or 2000-2018</li> </ul>
ADVANCED GENTRIFICATION	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Marginal change, increase, or rapid increase in housing costs</li> <li>• Gentrified in 1990-2000 or 2000-2018</li> </ul>
STABLE MODERATE/MIXED INCOME	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> </ul>
AT RISK OF BECOMING EXCLUSIVE	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Marginal change or increase in housing costs</li> </ul>
BECOMING EXCLUSIVE	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018</li> <li>• Rapid increase in housing costs</li> <li>• Absolute loss of low-income households, 2000-2018</li> <li>• Declining low-income in-migration rate, 2012-2018</li> <li>• Median income higher in 2018 than in 2000</li> </ul>
STABLE/ADVANCED EXCLUSIVE	<ul style="list-style-type: none"> <li>• High-income tract in 2000 and 2018</li> <li>• Affordable to high or mixed high-income households in 2018</li> <li>• Marginal change, increase, or rapid increase in housing costs</li> </ul>

Figure 304034. Displacement Typology

#### 4.7.5 Homelessness

The 2020 point-in-time data estimated that there more than 63,000 (sheltered and unsheltered) people experiencing homelessness in Los Angeles County. As of the 2020 survey, there were an estimated 15 unsheltered people experiencing homelessness in the City. The number has declined by approximately 46% since 2019, where the City had 22 people that were unsheltered. Of those unsheltered in 2019, approximately 11 were sleeping in vehicles, 8 were Hispanic or Latino persons, 13 were between the ages 25 and 54 years, and 16 identified as male. In 2018, the City calculated 41 unsheltered people, indicating that the number has declined greatly over the last few years. Additional analysis on those experiencing homelessness in the City and resources that are available to support this population is included in **Appendix B, Needs Assessment**.

Generally, households that experience higher rent burdens, poor housing conditions, and an increased risk of displacement are at greater risk of experiencing homelessness. When compared to the region, Manhattan Beach has lower rates of substandard housing, overcrowding, and is at a low risk of displacement. While there are moderate rates of household overpayment for both renters and homeowners in the City, overpayment is relatively low when compared to the region.

### 4.8 Summary of Fair Housing Issues

The following is a list of key conclusions and potential impediments that may exist in the City based on the fair housing issues identified in this assessment of fair housing:

- **Racial Demographics:** The racial composition of the City is primarily non-Hispanic White and is not racially diverse when compared to the region. Approximately 73 percent of City residents are non-Hispanic White; 19 percent of the population is Asian; and 8 percent of residents identify as Hispanic. At a regional level, the City is not considered to be integrated.<sup>23</sup>
- **Median Household Income:** The median household income is \$153,023, which is 239 percent of the County median income of \$68,004. Although there are no wealth segregation trends in the City, at a regional level, there is a relatively large wealth gap between the City and County.
- **Housing Affordability:** Of the renter-occupied lower-income households, about 83 percent spent more than 30 percent of their income on rent. Of the total 13,535 households in the City, approximately 29 percent were housing cost burdened.
- **Variety of Housing Types:** The City does not have a diverse housing supply because the share of all single-family units in the City is approximately 77.2 percent, higher than the 61.7 percent share of single-family units in the Southern California Association of Governments region.

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<sup>23</sup> Integration generally means a condition in which there is not a high concentration of persons of one particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.

## 5 Sites Inventory

State law, Government Code Section 65583.2(a), requires that the sites identified in a sites inventory be analyzed with respect to the AFFH analysis to determine if the designation of sites serves the purpose of replacing segregated living patterns with balanced living patterns and transforming R/ECAPs into areas of opportunity. Through the various goals, policies, and programs present within the Housing Element, adequate sites should accommodate the Regional Housing Needs Allocation in a manner that affirmatively furthers fair housing. The State requires sites identified as lower-income units to be in a zone that permits the City's default density<sup>24</sup> of 30 dwelling units per acre and be at least 0.5 acres in size. Some of the challenges in identifying sites in the City include lack of vacant land, lack of underutilized land, small parcel sizes, and limited overall land zoned to allow for 30 dwelling units per acre.

The majority of the City's land zoned for residential uses is zoned as Single-Family Residential (RS), which does not meet the default density of 30 dwelling units per acre as required by State law. In addition, provisions in Section 10.12.030 of the City's Planning and Zoning Ordinance do not allow the City to amend development standards related to increased density in residential zones without Citywide voter approval (refer to **Appendix C**). However, portions of the City's Medium-Density Residential (RM) Zoning District and all of the City's High-Density Residential (RH) and three Commercial Zoning Districts permitting mixed use and residential development (North End Commercial [CNE], Local Commercial [CL], and Downtown Commercial [CD]) meet the required default density.

As such, the City was able to identify select sites in the existing mixed-use commercial (CL and CNE) and High-Density Residential (RH) zones meeting the default density requirements. To accommodate the remaining lower-income Regional Housing Needs Allocation, the City has identified additional sites that will be made available within 3 years and 120 days from the beginning of the planning period as part of **Program 2, Adequate Sites**, of the Housing Element. Refer to **Appendix E, Sites Analysis and Inventory**, for a detailed description of the methodology.

The sites selected in **Appendix E** affirmatively further fair housing. All Census tracts in the City are shown on the 2020 Tax Credit Allocation Commission Opportunity Map and proposed 2021 Map as areas of highest resource or high resource. As such, sites selected to accommodate lower-income housing are considered to have access to resources. No part of the City is designated as an area of high segregation. As previously described, the City is primarily non-Hispanic White, with approximately 73 percent of the total population; there is no concentration of other racial or ethnic groups in the City that would constitute a highly similar and segregated area, and, as a consequence, the designated sites will not increase segregation in the City. Because the City has identified adequate sites to accommodate the moderate- and above moderate-income Regional Housing Needs Allocation, no rezone program in the Housing Element is needed for the City's moderate- or above moderate-income Regional Housing Needs Allocation for the planning period. The selected sites are located throughout the City, and lower-income sites are in areas with high median household income, which will improve conditions and create mixed-income neighborhoods with high access to resources and improve the quality of life for all residents. The selected

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<sup>24</sup> "Default Density" per Government Code Section 65583.2(c)(3)(B) allows local governments to use "default" density standards deemed adequate to meet the appropriate zoning for lower-income units.

sites for all income levels, coupled with the programs in the Housing Element incentivizing development in the City, will improve conditions related to substandard housing and displacement by creating opportunities for an increased supply of affordable and market-rate housing in the City.

## 6 Identification and Prioritization of Contributing Factors

An analysis of the contributing factors to fair housing is used to inform the strategies employed by the Housing Element for Affirmatively Furthering Fair Housing. The key issues identified through analysis can be found in Section 4.8, Summary of Fair Housing Issues. Although the City benefits from low rates of poverty, high household median income, and access to educational and economic opportunities, some households may suffer from housing discrimination that is prompted by land use and zoning practices, high housing costs, reluctance for change, and poor outreach. The abundance of single-family housing stock enforced by in combination with high income households creates a barrier for diverse housing opportunities suitable for lower income households, disabled persons, and racial and ethnic minorities. Trends have resulted in residential segregation and causes the City to be one of the least diverse in than the region in regards to wealth and demographics. To better meet the needs of the population, the City will need to provide fair housing opportunities that will improve access to resources, provide upward mobility, and allow for an integrated community, especially for populations that have historically and currently face discrimination.

### 6.1 Prioritization of Contributing Factors and Actions Designed to Meaningfully Address Contributing Factors

As detailed in “Section 4.8 Summary of Fair Housing Issues” the key fair housing issues in the City include the lack of racial and ethnic diversity as shown by the racial demographics; the high median household income as compared to the region; the high cost of housing that leaves many households, especially renter households, disproportionately burdened by their housing costs; and the lack of diversity in the housing types within the City. This section will further analyze the contributing factors to outreach, segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, and the strategies employed by the Housing Element for AFFH based on the identified and prioritized contributing factors.

The following lists and prioritizes those factors that contribute to fair housing issues in Manhattan Beach and includes the City’s priorities for addressing impediments to fair housing issues:

#### 1. Land Use and Zoning

1. Land use and zoning is a key contributing factor for the lack of diversity in the types of housing available. An increase in the diversity and supply of the City’s housing stock can help to increase opportunities for lower-income households, those with disabilities, and increasing options for a more diverse population. The City is largely single-family residential, which is a low-density housing type and historical mansionization of single properties has further reduced existing densities in neighborhoods. Per HCD’s guidance on zoning barriers for persons with disabilities, the lack of a variety of housing types and zoning capacity for multifamily development in the City

is considered a barrier because the majority of land permitting residential uses is currently zoned as Single-Family Residential (RS), which aims to provide opportunities for single-family residential land use in neighborhoods. The City has resources in place for persons with disabilities, such as a reasonable accommodation request process to accommodate special needs and allow for supportive housing in all residential zones. Programs in the Housing Element, such as **Programs 158, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts**, the City will further facilitate affordable housing development through the removal of discretionary requirements when a development utilizes the Density Bonus program. Through **Program 2125, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**, the City will amend existing reasonable accommodation procedures and will promote the availability of this program through outreach. ~~Through~~ **Program 2528, Specialized Housing Types to Assist Persons with Special Needs**, the City will increase development opportunities for Emergency Shelters, Supportive Housing, and Low-Barrier Navigation Centers, creating pathways to long-term solutions for extremely low-income households and those experiencing homelessness. Additionally, **Program 28** will increase the variety of housing types and facilitate the development of multifamily housing for employee housing for agricultural workers.

The Adequate Sites Program, **Program 2**, of the Housing Element, will increase available land in the City that permits 100 percent multifamily residential uses, set a minimum density requirement of 20 units per acre, and allow by-right development for developments in which 20 percent or more of the units are affordable to lower-income households, increasing available capacity and opportunities for an increased variety of housing types. **Program 1** of the Housing Element will incentivize the development of accessory dwelling units (ADUs) and junior ADUs, and specifically promote the creation of ADUs that can be offered at an affordable rent for extremely low-, very low-, low-, or moderate-income households. Through the Density Bonus Program, **Program 118** of the Housing Element, the City will ~~continue updating~~ implement needed updates to its Density Bonus Ordinance, consistent with State law, and offer a streamlined approval process for projects that qualify for a density bonus (see **Program 15-18** of the Housing Element for details). Through the removal of discretionary requirements for multifamily housing, the City will minimize constraints to the development of affordable housing. In addition, as part of **Program 13-16, Lot Consolidation Incentive**, ~~of the Housing Element~~, the City provides an additional density bonus incentive under Section 10.12.030 of the Manhattan Beach Municipal Code above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus to further incentivize development of affordable housing. The City will continue to offer the lot consolidation incentive throughout the 6<sup>th</sup> Cycle to further facilitate multifamily residential developments, especially those offering affordable housing opportunities. These programs are the City's priorities for addressing the lack of variety in housing types and will increase diversity among the City's housing stock.

These programs aimed to address land use and zoning will increase the City's housing stock and variety of housing types, creating new opportunities for increased diversity in household income and household demographics.

## **Voter Initiatives.**

2. Voter initiatives is a key contributing factor for the lack of diversity in the types of housing available. While the City has not experienced formidable opposition to the development of affordable housing in its neighborhoods, voter initiatives that prevent changes to many existing development regulations contribute to the lack of diversity in housing types. However, Due to an existing voter initiative, development regulations in the RS, RM, and RH residential zoning districts cannot be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit, unless the amendment is first submitted to a Citywide election and approved by a majority of the voters. According to HCD's AFFH guidance, this is considered a measure that limits housing choices. The voter initiative is a unique barrier to the production of housing in the City, therefore the City has committed to the following programs that will allow them to meet their housing needs despite this barrier.

As noted in the Sites Inventory (**Appendix E**), vacant land is extremely scarce in the City, and adequate sites for lower-income housing, based on HCD-Housing Element law criteria, are currently limited. Therefore, **Program 2, Adequate Sites**, of the Housing Element would increase the availability of parcels zoned to allow sufficient density to accommodate the economies of scale needed to produce affordable housing as required by State law, and specifically incentivize lower-income housing development. The ADU Program will also aim to increase density in residential and mixed-use zones by incentivizing the development of ADUs and junior ADUs, which recent development trends have proven to effectively increase housing opportunities in the City. Due to limitations attributed to the existing voter initiative, the City has committed to programs to attenuate this barrier to a variety of housing types by increasing residential opportunities within commercial zones. Residential development is currently allowed in the following commercial zones: CL, CD, and CNE. Through **Program 1518, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts**, the City will amend its Zoning Code to adopt a streamlined approval process and development standards for multifamily residential and mixed-use projects in those commercial zones. This program will further incentivize and provide additional opportunities for multifamily development, especially where affordable housing is provided.

These programs will address land use and zoning constraints caused by the voter initiative, increasing the City's housing stock and variety of housing types, creating new opportunities for increased diversity in household income and household demographics.

## **Affordable Housing.**

3. The lack of affordable housing is a key contributor to the high cost of housing and is likely a contributor to the lack of racial and ethnic diversity in the City. Further, while the median household income of existing residents is high within the City, there are few opportunities for lower-earning households across the region to move into the City, creating a sense of exclusivity.



[The lack of affordable housing contributes to the high household income of the area, as there are few opportunities for lower-income earning households to enter the area.](#) High housing costs have contributed to the areas identified as RCAAs because a higher income is needed to afford living in the City. This is a State-wide issue along the coastal cities in California. The City is incentivizing housing development by identifying adequate and viable sites to make available and accommodate affordable housing in the next 8-year planning period. **Program 1, [Accessory Dwelling Units](#)**, of the Housing Element incentivizes the development of ADUs that can be offered at an affordable rent for very low-, low-, or moderate-income households; **Program 2, [Adequate Sites](#)**, would allow for increased opportunities for affordable housing in the General Commercial (CG) and Planned Development (PD) zones, which have previously not allowed residential uses; **Program 9-12, [Developer Outreach and Transparency](#)**, provides developer outreach, such as regulatory education, and updates on local and State incentives for development; **Program 18, [Multifamily Residential Development Standards and Streamlining in the Mixed-Use \(CL, CD, and CNE\) Commercial Districts](#)** creates residential development standards and a streamlined approval process for multifamily and mixed-use projects in the CL, CD, and CNE commercial zones; and **Program 13-16, [Lot Consolidation Incentive](#)**, provides an additional density bonus for multifamily projects that qualifies for the State density bonus in exchange for lot consolidation. The City will continue to participate in the Section 8 housing voucher program, which provides rental assistance, and through **Program 12-15, [Housing Choice Voucher Program](#)**, the City is committing to better connect residents to County, State, Federal, and other housing assistance resources. [Through Program 28, \*\*Specialized Housing Types to Assist Persons with Special Needs\*\*, the City will implement amendments to its zoning code to increase flexibility in regulations, creating increased opportunities for the development of employee housing, supportive housing, emergency shelters, and low-barrier navigation centers.](#) As part of the Housing Element, these programs will further incentivize and provide additional opportunities for housing affordable to very low, low-, and moderate-income households, and those with special needs.

[These programs will increase the supply of affordable housing and remove barriers to affordable housing for lower-income households, including extremely low-income households and those with disabilities, increasing opportunity for upward mobility and access to resources.](#)

#### **Fair Housing Enforcement and Outreach Capacity.**

- 4.** The City recognizes the importance of educating residents and developers to reduce housing discrimination in the City. Although County and regional fair housing resources are available, the City only currently provides fair housing information and referrals upon request. Therefore, many residents and developers are not aware of [these available](#) resources. Through **Program 11-14, [Fair/Equal Housing Program](#)**, the City will continue to support and participate in the Regional Analysis of Impediments to Fair Housing Choice in coordination with the County's Community Development Commission and HACoLA to continue identifying fair housing issues in the City; promote compliance with housing discrimination laws by developing a handout for developers to be made aware of fair housing advertisement material related to the sale or rental of housing pursuant to Government Code 12955, which prohibits such materials from indicating a preference or limitation based on a protected classification; and provide links to fair

housing resources, including developer handout materials, on the City's website. Further, the City will administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing by developing a process that prompts the consideration of fair housing in the decision process. This process could include a requirement to have a statement of fair housing consideration on all decision letters or staff reports, whichever is applicable. Additionally, through **Program 25, Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**, the City will remove potential barriers for people with disabilities, including persons with developmental disabilities, related to requests for reasonable accommodations, and in accordance with current fair housing laws and conduct outreach to promote reasonable accommodation procedures.

Through these programs the City will address issues related to land use and zoning, voter initiatives, affordable housing, and fair housing enforcement and outreach to improve the supply, affordability, and variety of housing types, increasing access to resources, opportunities for upward mobility, and allowing for a more diverse community through increased opportunities for populations that have historically and currently face discrimination.

# Appendix E: Sites Analysis and Inventory

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# 1 Introduction

As provided under California State law (Government Code Sections 65583[a][3]), a General Plan Housing Element must include an inventory of land suitable for residential development, including vacant sites that can be developed for housing within the planning period, and non-vacant sites having realistic and demonstrated potential for redevelopment during the planning period to meet the local Regional Housing Needs Allocation (RHNA) at all income levels. As further detailed in the following discussion, every local jurisdiction is assigned a number of housing units representing its share of the State’s housing needs for an 8-year planning period. The City of Manhattan Beach’s (City) housing need for the 6th Cycle (8-year planning period [2021–2029]) consists of 774 total units, including housing at all income levels.

This appendix of the Housing Element contains an analysis and inventory of sites within City limits that are suitable for residential development during the planning period. State law requires a land inventory that relies largely on vacant sites, and if a City is relying on non-vacant sites, findings based on substantial evidence must be provided to demonstrate that the existing use does not constitute an impediment to additional residential development. However, the City is completely built-out, meaning that vacant sites are nearly nonexistent (further discussed in Section 3.1, Process Overview). Furthermore, the lack of supply in vacant land currently available in the City is not something that the City can directly control. The City can only incentivize and promote redevelopment within the City, which is the intent of several programs in the Housing Element, such as **Programs 1, 2, 3, 8, 9, 11, 13, 15, 16, 18, 19, 22** and **2830**. Although State law (Government Code Section 65583.2) presumes existing uses to be an impediment to additional residential development, because of the built out nature of the City, most development projects are on infill sites. Furthermore, with the booming housing market in California, the median home price in the City rose to \$2,923,949 as of August 2021, giving developers a large financial incentive to pursue redevelopment opportunities on non-vacant sites in the City.

As presented in this analysis, through the Sites Analysis for the 2021–2029 planning period, the City has identified capacity for ~~384~~377 total units through underutilized sites, projected accessory dwelling units (ADUs), and pipeline projects, which are expected to receive Certificates of Occupancy within the planning period. The City has an adequate supply of land to accommodate the City’s RHNA of 132 above moderate-income and 155 moderate-income units. The City has identified existing capacity to realistically accommodate ~~85~~81 lower-income units through underutilized sites, projected ADUs, and pipeline projects. To meet the remaining RHNA for lower-income units, the City commits to **Program 2, Adequate Sites**, of the Housing Element, and has identified areas to increase capacity in the City to not only meet its housing need, but to ensure adequate capacity throughout the planning period through a generous buffer for additional lower-income sites that exceeds the City’s RHNA (see Section ~~7.1~~, ~~Sites to Accommodate Lower Income Shortfall and Buffer~~Identified for Adequate Sites Program).

In conjunction with the sites identified for the Sites Inventory, the Housing Element programs will further support new development on sites identified at and above the corresponding capacity established for the respective sites. This Sites Analysis and Inventory describes the City’s housing target for the 6th Cycle planning period (6th Cycle); provides an overview of [the](#) methodology for identifying underutilized sites; breaks down the methodology by which realistic development capacity was determined; identifies existing capacity for all RHNA income categories; evaluates development that is currently underway, which counts toward the City’s housing need; details the expected number of ADUs

to be developed within the planning period; and summarizes the approach used for the identification of sites selected for the Adequate Sites Program of the Housing Element.

## 2 Regional Housing Needs Allocation

Pursuant to State law, each jurisdiction in the State has a responsibility to accommodate a share of the projected housing needs in its region. The process and methodology of allocating regional housing needs to individual cities and counties is conducted through an assessment of the region’s housing need, and the unit count allocated to cities and counties results in the RHNA. The RHNA is mandated by State housing law as part of the periodic process of updating local Housing Elements of General Plans, and the total number of units for each region is provided by the Department of Housing and Community Development (HCD). The RHNA quantifies the need for housing within each jurisdiction during specified planning periods.

As part of the assessment and allocation process, each council of governments must develop a methodology that determines each jurisdiction’s RHNA as a share of the regional determination of existing and projected housing need provided by HCD. Each jurisdiction’s RHNA is broken down by income category, ensuring that all economic groups are accommodated. The methodology generally distributes more housing, particularly lower-income housing, near jobs, transit, and resources linked to long-term improvements of life outcomes, and must further state objectives, including affirmatively furthering fair housing.

The City’s share of regional housing need was determined by a methodology prepared by the Southern California Association of Governments (SCAG) as part of its Final Regional Housing Needs Assessment Allocation Plan, adopted in March 2021 and updated June 2021. In accordance with the Final RHNA Allocation Plan, the City must plan to accommodate 774 total housing units for the projection period beginning June 30, 2021 and ending October 15, 2029. This is equal to a yearly average of approximately 93 housing units. The 774 total units are split into four RHNA income categories (very low, low, moderate, and above moderate). **Table 1, City of Manhattan Beach Regional Housing Needs Allocation 2021–2029**, provides the City’s RHNA by income category. Of the 774 total units, the City must plan to accommodate 322 units for very low-income households, 165 units for low-income households, 155 units for moderate-income households, and 132 units for above-moderate-income households.

Table 1. City of Manhattan Beach Regional Housing Needs Allocation 2021–2029		
Income Category	Units	Percent of Total
Very Low-Income	322	41.6%
Low-Income	165	21.3%
Moderate-Income	155	20%
Above Moderate-Income	132	17.1%
Total	774	100%

As shown in Table 1, the City must accommodate 774 total housing units from 2021 to 2029. To ensure that adequate capacity is maintained in the City throughout the 6th Cycle, additional capacity above and beyond the RHNA assigned to the City has been identified [in this analysis](#). In accordance with State

requirements, the City will monitor the housing capacity identified in the Sites Inventory throughout the planning period to maintain sufficient capacity for the remaining RHNA at all income levels.

### 3 Vacant and Underutilized Sites Methodology and Assumptions

State law requires each jurisdiction to include a land inventory to identify specific sites that are suitable for residential development and demonstrate that sufficient land is zoned to provide housing capacity that is adequate to meet the RHNA for each income level. This section of the Sites Analysis and Inventory describes the methodology used to calculate the housing capacity on all vacant and non-vacant developable land within the City limits that is zoned to allow for housing and available to develop within the Housing Element planning period.

#### 3.1 Process Overview

The Sites Analysis was completed using Geographic Information Systems (GIS) mapping software with multiple data sets to identify potentially available housing sites, largely depending on SCAG’s annual land use parcel-level dataset (ALU v.2019.2) available from SCAG’s open GIS data portal, last updated in June 2021. SCAG’s land use dataset provides extensive parcel-level data, including existing land uses, mainly based on 2019 Tax Assessor records.<sup>1</sup> The City is nearly completely built-out, meaning that vacant sites are nearly nonexistent, which was verified using the Tax Assessor land use codes. Local governments with limited vacant land resources may rely on non-vacant and underutilized residential sites to accommodate their RHNA. Although HCD’s Housing Element Site Inventory Guidebook (Government Code Section 65583.2) states that a “nonvacant site’s existing use is presumed to impede additional residential development,” the City’s opportunities for residential development depends on underutilized sites due to the lack of vacant land. Although some parcels identified have vacated uses, or are largely undeveloped, per HCD’s definition of vacant sites, all sites identified in this analysis are considered non-vacant. Further, all sites zoned for residential development in the City are already developed with residential units. Therefore, this Sites Analysis ~~largely~~ depends on those underutilized sites within City limits that are zoned to allow for residential development identified by their land-to-improvement ratio, age of buildings, existing uses that may preclude development, proximity to resources and existing infrastructure, and other data indicating possible constraints to development feasibility. The specific factors for identifying and prioritizing underutilized sites are summarized as follows:

- **Building Age** – Buildings more than 30 years old. Building age is also a major factor influencing property valuation and land value. The age of housing is often an indicator of housing conditions. In general, housing that is 30 years or older is considered an older building as it may begin to need costly repairs.
- **Under Valued** – An assessed land-to-improvement (LTI) ratio less than 1. Improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value.

<sup>1</sup> Source of 2019 existing land use: -SCAG\_REF – SCAG’s regional geospatial datasets; ASSESSOR – Assessor’s 2019 tax roll records; CPAD- California Protected Areas Database (version 2020a; accessed September 2020); CSCD – California School Campus Database (version 2018; accessed September 2020); FMMP – Farmland Mapping and Monitoring Program’s Important Farmland GIS data (accessed September 2020); MIRTHA – U.S. Department of Defense’s Military Installations, Ranges, and Training Areas GIS data (accessed September 2020).

- **Underbuilt** – Commercially zoned sites where the current floor area ratio compared to the maximum allowable floor area ratio is less than 100 percent. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt.
- **Resource Access** – Within TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households.
- **Existing Use** – On the ground research informed the selection of sites to ensure that existing uses can realistically be redeveloped within the planning period. This includes knowledge of existing long-term leases and existing known vacancies.
- **Local Knowledge** – City knowledge of property owner interest to sell or of developer interest to redevelop was utilized to identify non-vacant sites regardless of the factors listed above.

The sites identified as underutilized include a mix of underutilized uses such as dilapidated parking lots, automotive repair shops, office spaces and restaurants with large surface car lots, and single-family residential units zoned for commercial and allowing multifamily and mixed-use developments. The underutilized sites are not known to have been occupied in the past 5 years with housing occupied by lower-income residents. Nonetheless, the City will mandate replacement requirements pursuant to the requirements as set forth in Government Code Section 65915, subdivision (c)(3) on sites identified in the Sites Inventory through Program 26, Replacement Requirements, of the Housing Element. -In addition, online mapping tools—including Google Earth, Google Maps, and Los Angeles County Office of the Assessor Property Assessment Information System—as well as City knowledge of the current projects in the pipeline and development interest in certain areas of the City were used to verify underutilized status and existing uses. **Table 2, Underutilized Site Capacity**, provides a summary of existing capacity units identified by income category.

Table 2. Underutilized Site Capacity			
Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
<del>28</del> 24	<del>461</del> 158	19	<del>208</del> 201 units

### 3.2 Sewer, Water, and Environmental Constraints

Environmental and infrastructure constraints cover a broad range of issues affecting the feasibility of residential development. All parcels included in the Sites Inventory were reviewed for any known environmental constraints, sewer and water capacity, and dry utilities. The sites included in the inventory have all been designated for residential development, have access to existing sewer and water capacity and dry utilities, and are not constrained by known site-specific or environmental constraints that would limit development. Land suitable for residential development must be appropriate and available for residential use in the planning period. As such, the sites were also reviewed according to their development standards and regulations, as well as recently approved or built residential projects in the same zones where housing is an allowed use. Sites in the General Commercial (CG) and Planned Development (PD) Districts that require an overlay or rezoning to permit residential uses were also included in the Site Analysis based on the Adequate Sites Program included in the Housing Element required to address an RHNA shortfall. See Section 7, Sites Identified for Adequate Sites Program, for details.



### 3.3 Density and Affordability Assumptions

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, ~~the~~ local government to demonstrate that the projected residential development capacity of the sites identified in the Housing Element can realistically be achieved. The following subsections provide an analysis of the realistic capacity assumptions per income level identified in zones allowing for residential uses.

#### ~~3.2.13.3.1~~ 3.3.1 Lower-Income Units

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to demonstrate that the projected residential development capacity of the sites identified in the Housing Element can realistically be achieved. ~~This R~~Realistic capacity may be determined by ~~utilizing~~ established minimum densities to calculate the housing unit capacity ~~or utilizing~~ adjustment factors such as development trends of existing or approved residential developments at a similar affordability level in the City. The City does not have established minimum densities in the City; therefore, the Sites Inventory develops the realistic capacity for residential zones by analyzing development trends in the City (**Table 3, Development Trends**), planned development projects, and local knowledge to calculate lower-income units in the City.

As a conservative estimate of capacity calculations, the Sites Analysis ~~estimated~~ estimates realistic capacity is 20 dwelling units (du) per acre for the City's Medium-Density Residential (RM) zone in Area District ~~3III~~, and for the High Density Residential (RH), Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts (~~1I~~ through ~~4IV~~) for sites identified to accommodate the City's lower-income RHNA (see **Table 34, Lower-Income Units Density Assumptions by Zone**). The RM zone in Area District III and RH, CL, CD, and CNE zones in Area Districts I through IV are analyzed for lower-income units as these zones meet the City's default density of 30 ~~du per acre~~ dwelling units per acre (See **Section 4.1, Lower-Income Sites** for more details). Table 3 includes an analysis of residential and mixed-use development projects from 2019 and 2020, and prospective projects. ~~Recent development examples shown in Table 3 indicates~~ that an average of 90 percent of the maximum ~~capacity~~ density was achieved in residential and commercial zones. Since most development in the City has been for moderate- and above moderate-income housing units, the analysis also considers two planned projects which include an affordability component. A project located at 401 Rosecrans Avenue known as Verandas includes a total of 79 units with 73 above moderate-income units and 6 very low-income units. And a project ~~known as~~ located at 1701 – 1707 Artesia which includes a total of 14 residential units, 13 of which are affordable ~~to~~ for above moderate-income households and 1 affordable ~~to~~ a very low-income households. The Verandas and 1707 – 1707 Artesia projects achieved 152 percent and 117 percent ~~capacity~~ of the maximum density ~~du per acre~~ dwelling units per acre allowed under each ~~respective zone, respectively~~ (see **Section 5, Planned, Approved, and Prospective Projects** for more details).

Another factor informing the realistic capacity for lower-income units is the potential for mixed-use projects and nonresidential development in zones that allow 100 percent nonresidential development (CL, CD and CNE zones). As such, recent development trends were ~~also~~ analyzed to capture the potential for nonresidential development ~~in the development of~~ to inform the realistic capacity. The ~~aforementioned~~ 1701 – 1707 Artesia, is a recent planned mixed-use development project in the City. This project is located in the CL zone which is a mixed-use zone that allows 100 percent nonresidential development. As detailed in **Section 5.2, 1701-1707 Artesia**, this project includes 649 square feet of commercial space and 14 residential units. The CL zone in Area District I allows for a maximum 43.6 ~~du~~

~~per acre dwelling units per acre; however, utilizing a density bonus as permitted under State law, the project achieved a density of 46.6 du per acre dwelling units per acre. Regardless of the commercial component, the project was able to achieve a density well over the maximum density permitted exceed the maximum permitted density, achieving 117 percent of the maximum density permitted. The Verandas project is located in the CNE zone, Area District III which allows a mix of uses and maximum capacity density of 51.2 dwelling units per acre. And a~~ Although the site allows for the development of nonresidential uses and is located in an area where mixed-use development is commonplace, the ~~planned~~ development is 100 percent residential and does not include a mixed-use component. Furthermore, the developer used incentives ~~such as including~~ a density bonus as permitted under State law, ~~in addition to a 10 percent~~ and a density bonus provided through the City's lot consolidation incentive. Therefore, the project achieved a density of 79 ~~du per acre dwelling units per acre, much higher than the 51.2 dwelling units per acre permitted by the zone.~~ The Verandas project ~~The examples provided coupled with local knowledge of developer interest for residential development in the City support the likelihood that the two sites identified in zones that allow for nonresidential uses in Table 7, Lower-Income Sites, are highly likely to develop as residential uses.~~

The realistic capacity for lower-income sites ~~of 20 dwelling units per acre~~ is relatively low considering that the aforementioned zones allow up to a maximum density of 32.3 to 51.2 ~~du per acre dwelling units per acre~~. As is later detailed in Section 4.1, the Sites Inventory was able to identify existing capacity for three sites adequate for lower-income ~~units capacity~~. Two of the three sites identified in Table 7 (Table ID 1 and 2) are located in commercial zones CL Area District I and CNE Area District III which permit a maximum capacity of 43.6 and 51.2 ~~du per acre dwelling units per acre~~, respectively (see Section 4.1 for site details). A realistic capacity of 20 ~~du per acre dwelling units per acre~~ is approximately 48.8 percent and 39 percent of the maximum density allowed in each zone. Sites identified as Table ID 1 and 2 also have parcels that were previously identified as non-vacant sites in the 5th Cycle Housing Element and are subject to **Program 7, By-Right Development**, which allows developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households. Additional incentives for residential development include the State density bonus (**Program 11, Density Bonus**), which has been used on various projects in the City, the City's lot consolidation incentive (**Program 16, Lot Consolidation Incentive**) which allows for an additional density bonus beyond what is permitted under State law. Given recent development trends in the City, it is evident that developers are utilizing these incentives to increase and develop residential projects at densities above what is permitted under either the Zoning Code or General Plan. ~~Further, the~~

~~In conclusion the realistic capacity of 20 du per acre dwelling units per acre considers the development trends over the last three years at 90 percent capacity achieved, planned projects with affordable housing components achieving at least 117 percent of the maximum capacity, planned development and developer interest for residential development in mixed-use zones, and high maximum densities allowed per zone. Therefore, the realistic capacity is a very conservative assumption as it is below 50 percent of what is allowed per the base zones and considers the potential for commercial development on mixed-use sites by providing a generous buffer in the calculation. With high land values and limited vacant land available in the City, it is expected that property owners will strive for densities closer to or above the maximums.~~

Therefore, while these assumptions take into account realistic development potential for affordable units, they do not limit the ability of a project to be built at an overall higher density allowed under either the Zoning Code or the General Plan. With high land values and limited vacant land available in the City, it is expected that property owners will strive for densities closer to the maximums.

APN	Address	Zone	Area District	Acres	Max Units Under Zone	Units Permitted	Percent Capacity Achieved	Date Permit Issued
4176030008	2709 Manhattan Blvd	RH	II	0.058	2.97	2	100%	Jul-20
4175023013	3405 Bayview Dr	RH	III	0.04	2.04	1	50%	30-Sep-19
4179026014	117 13th St	RH	III	0.045	2.30	1	50%	2-Dec-19
4177009028	428 24th St	RM	III	0.031	1.00	1	100%	19-Mar-19
4166009004	1450 12th St	RH	II	0.161	7.013	4	57%	23-Oct-19
4166009005	1446 12th St	RH	II	0.16	6.96	4	67%	23-Oct-19
4180022015	120 4th St	RM	III	0.062	2.00	2	100%	1-May-19
4164001021	1843 11th St	RH-D2	I	0.1492	3.58	3	100%	29-Jul-19
4176027017	3009 Manhattan Ave	RH	III	0.031	1.58	1	100%	9-Oct-19
4175023014	3400 Manhattan Ave	RH	III	0.08	4.09	2	50%	28-Aug-19
4180026014	124 6th St	RM	III	0.06	1.93	1	100%	30-Sep-19
4177013009	2604 Alma Ave	RM	III	0.08	2.58	2	100%	28-Aug-19
4177015015	323 25th St	RM	III	0.06	1.93	1	100%	23-Jul-19
4176014014	409 30th St	RM	III	0.0403	1.30	1	100%	7-Aug-19
=	401 Rosecrans Blvd	CNE	III	1.02	52.27	79	152%	In process
=	1701-1707 Artesia Blvd	CL	I	0.30	12	14	117%	In process
Total	=	=		2.37	99	119	90%	=

APN = Assessor's Parcel Number

Area District	Maximum Density (units per acre)		Realistic Density (units per acre)	
	Medium Density Residential Zone (RM)	High Density Residential (RH)*	Medium Density Residential Zone (RM)	High Density Residential (RH)*
I	—	43.6 per acre	—	20 per acre
II	—	43.6 per acre	—	20 per acre
III	32.3 per acre	51.2 per acre	20 per acre	20 per acre
IV 4	—	51.2 per acre	—	20 per acre

Source: City of Manhattan Beach  
 \* CL, CD, and CNE zones are subject to the development standards in the RH zone and applicable Area District.

### 3.2.23.3.2 Moderate- and Above Moderate-Income Units

Sites identified to accommodate the City's moderate- and above moderate-income RHNA have been calculated assuming a conservative 80 percent of the maximum permitted density in the respective

zone. Development trends from 2019 and 2020, and prospective projects indicate that 90 percent of maximum capacity was achieved (see **Table 43, Development Trends**). Most of these projects were for moderate and above-moderate units—with recent planned developments which include an affordable housing component. Therefore, it is assumed that a buffer is provided through this conservative estimate of capacity. Parcel size is also considered in this analysis, as the average parcel size in zones that allow residential uses is approximately 0.09 acres and the median parcel acreage is 0.06. Since parcel sizes are very small, most developers will use the maximum density allowed to increase their return on investment. Recent development trends also indicate that developers are using City incentives to increase their density maximums. For example, Verandas is a residential development which provides 73 units affordable to above moderate-income households and 6 units to lower-income households (see Section 5.1 for details). While the base zone CNE, Area District III, allows for up to 51.2 du-per acredwelling units per acre, through State density bonus and lot consolidation incentives, the developer was able to increase development by 27 units (152 percent capacity achieved). As is later detailed in **Section 4.2, Moderate Income Sites** and **4.3, Above Moderate-Income**, sites identified in **Table 8, Moderate-Income Sites Identified**, and **Table 9, Above Moderate-Income Sites Identified**, were selected in the residential and mixed-use zoning districts (CL, CD, and CNE).As was previously discussed in **Section 3.3.1, Lower-Income Units**, residential developments in the City on nonresidential zones were able to achieve or exceed the maximum density allowed regardless of a commercial mixed use component. Nevertheless, the potential for nonresidential development on mixed-use zones sites is considered in the realistic capacity for moderate- and above moderate-income sites. The realistic capacity considers average parcel size, local knowledge of developer interest for residential development, development trends at 90 percent capacity, and residential incentives such as Program 11 and Program 16 which allow for densities above what is permitted under the Zoning Code or General Plan. -Table 4-3 provides a full list of development trends and corresponding densities in the City. **Table 5, Moderate- and Above Moderate-Income Units Density Assumptions by Zone**, provides an overview of the maximum and realistic capacity for each residential zone considered in the Sites Analysis for the moderate- and above moderate-income RHNA.

Table 4. Development Trends								
APN	Address	Zone	Area District	Acres	Max Units Under Zone	Units Permitted	Percent Capacity Achieved	Date Permit Issued
4176030008	2709 Manhattan Blvd	RH	2	0.058	2.97	2	100%	Jul-20
4175023013	3405 Bayview Dr	RH	3	0.04	2.04	1	50%	30-Sep-19
4179026014	117 13th St	RH	3	0.045	2.30	1	50%	2-Dec-19
4177009028	428 24th St	RM	3	0.031	1.00	1	100%	19-Mar-19
4166009004	1450 12th St	RH	2	0.161	7.013	4	57%	23-Oct-19
4166009005	1446 12th St	RH	2	0.16	6.96	4	67%	23-Oct-19
4180022015	120 4th St	RM	3	0.062	2.00	2	100%	1-May-19
4164001021	1843 11th St	RH-D2	1	0.1492	3.58	3	100%	29-Jul-19
4176027017	3009 Manhattan Ave	RH	3	0.031	1.58	1	100%	9-Oct-19
4175023014	3400 Manhattan Ave	RH	3	0.08	4.09	2	50%	28-Aug-19
4180026014	124 6th St	RM	3	0.06	1.93	1	100%	30-Sep-19
4177013009	2604 Alma Ave	RM	3	0.08	2.58	2	100%	28-Aug-19
4177015015	323 25th St	RM	3	0.06	1.93	1	100%	23-Jul-19
4176014014	409 30th St	RM	3	0.0403	1.30	1	100%	7-Aug-19
—	401 Rosecrans Blvd	CNE	3	1.02	52.27	79	152%	In process

—	1701-1707 Artesia Blvd	CL	1	0.30	12	14	117%	In process
Total	-	-		2.37	99	119	90%	-

APN = Assessor's Parcel Number

Table 5. Moderate- and Above Moderate-Income Units Density Assumptions by Zone						
Area District	Maximum Density (units per acre)			Realistic Density (units per acre)		
	Single-Family Residential Zone (RS)	Medium Density Residential Zone (RM)	High Density Residential (RH)*	Single-Family Residential Zone (RS)	Medium Density Residential Zone (RM)	High Density Residential (RH)*
1I	5.8 per acre	11.6 per acre	43.6 per acre	4.6 per acre	9.3 per acre	34.8 per acre
2II	9.5 per acre	18.9 per acre	43.6 per acre	7.6 per acre	15.2 per acre	34.8 per acre
3III	25.6 per acre	32.3 per acre	51.2 per acre	20.5 per acre	25.8 per acre	41 per acre
4IV	—	—	51.2 per acre	—	—	41 per acre

Source: City of Manhattan Beach  
\* CL, CD, and CNE zones are subject to the development standards in the RH zone, and applicable Area District.

## 4 Existing Capacity

### 4.1 Lower-Income Sites

In accordance with Housing Element law (Government Code Section 65583.2[c][3]), the City's default density for accommodating capacity for lower-income units (322 very low-income units and 165 low-income units) requires zoning that permits a minimum of 30 ~~dwelling units per acre~~ because the City is considered a metropolitan jurisdiction. The City has five zones that permit densities of 30 ~~dwelling units per acre~~ or greater: the RM zone, in only Area District 3III; RH zone in any Area District; and the CL, CNE, and CD zones, which are subject to the development standards for multifamily housing in the RH zone. Although there are many zones that permit the default density considered adequate for lower-income units, the Sites Inventory was only able to identify existing capacity for 24 units on 3 sites. There are no vacant parcels available in the City that can accommodate lower-income units, therefore, the Sites Inventory relies on non-vacant sites as detailed in Section 3, Vacant and Underutilized Sites Methodology and Assumptions. This section will provide an overview of the challenges and limitations the City experienced in identifying lower-income sites compliant with State law including size of sites and existing uses on non-vacant parcels, followed by a site level analysis. Underutilized sites in the higher density zones were generally included in the Sites Inventory as lower-income sites.

#### 4.1.1 Size of Sites and Lot Consolidation

~~Further, it is detailed under~~ State guidance indicates that sites that are too small or too large may not facilitate developments ~~of affordable to this lower~~-income ~~level~~ households. Government Code Section 65583.2(c)(2)(A)(B) requires sites identified for lower-income units be limited to 0.5 to 10 acres. To meet the minimum acreage, a site may include two or more smaller parcels that have a realistic potential to be consolidated and developed into one site. In selecting sites for lower-income units, given the criteria, the City experienced various limitations and challenges identifying sites that met the size criteria. As previously mentioned, a Although the City has five zones that permit a minimum of 30 ~~dwelling units~~ ~~per acre~~ dwelling units per acre, the ~~average median~~ parcels size is approximately 0.06 acres. Therefore,

opportunities for identifying contiguous and underutilized parcels that can reasonably be expected to be consolidated as one site are limited. Sites smaller than 0.5 acres are deemed inadequate to accommodate development for lower-income housing unless evidence or recent trends can prove otherwise. As shown in Table 43, 15 of the 16 development projects over the last 3 years have been located on sites smaller than 0.5 acres, which is reflective of the average parcel size in the City being far below 0.5 acres. Although not all of the projects built in the last 3 years have included an affordable housing component, it can be assumed, based off these trends and existing opportunities for small site development, that developer interest in building housing affordable to all income levels on sites smaller than 0.5 acres will continue into the 6th Cycle. Furthermore, a recent planned development, 1701 – 1707 Artesia, has an affordable housing component and is built on a 0.30-acre site. This small site combined two parcels to achieve the 0.30 acres. Therefore, this site supports the assumption that lower-income sites in the City will be developed on sites smaller than 0.5 acres. While one of the three sites identified do not meet HCD’s minimum acreage criteria, the two sites that do not meet the acreage criteria and are just under 0.5 acres (see Table 7) and are considered adequate for lower-income development based on the median parcel size in the City, development trends on small sites, and planned projects with affordable housing built on consolidated sites less than 0.5 acres. in size based on the previously detailed trends.

Further, a study of current properties on the market zoned for multifamily development in the City and surrounding cities including Redondo Beach, Hermosa Beach, and El Segundo, revealed that the median parcel size for multifamily development lots is 0.06 acres. Lot acreages ranged from 0.03 acres to 0.17 acres. A notable multifamily development on the market located in El Segundo, included a 31-unit development on a 0.13-acre lot. Through market trends, it is clear available properties have small parcel sizes and can be assumed that development for lower-income sites will be built on sites smaller than 0.5 acres and developed at densities higher than the realistic capacity of 20 du per acre dwelling units per acre. The following subsections below (4.1.3.1 - 4.1.3.3) provide site specific details of how the City will ensure small sites can adequately accommodate the lower-income RHNA.

The analysis also considers the likelihood that sites with multiple parcels can be consolidated. Two sites identified for lower-income development (Table ID 1 and 2) include multiple parcels and are identified as consolidated sites. Since most parcels in the City are small, it can also be assumed that developers will consolidate parcels, as is supported by recent planned projects, Verandas and 1701 – 1707 Artesia, which include consolidated parcels. The City also provides several incentives to encourage and facilitate the development of lower-income housing through various programs. Through Program 16, the City provides an additional density bonus in exchange for lot consolidation on sites greater than 0.5 acres, and sites greater than 0.3 acres that are identified to accommodate the RHNA in the Sites Inventory. Again, this incentive was utilized by Verandas planned development project to increase their density. And as part of Program 16 the City will also assist affordable housing developers in identifying opportunities for lot consolidation using the City’s GIS system and property database. Through Program 11, developers may also increase their density in exchange for affordable housing, pursuant to State law. The following subsections below (4.1.3.1 - 4.1.3.3) provide site specific details of how the City will ensure sites identified for consolidation can adequately accommodate the lower-income RHNA.

#### 4.1.2 Non-Vacant Parcels

All three sites identified as having the capacity to accommodate lower-income housing were identified on parcels considered to be underutilized. As previously mentioned, there are no available vacant

parcels in the City and all residential zoned land in the City is already developed with residential uses. Therefore, in selecting sites for the lower-income RHNA, the Sites Inventory analysis considered the factors listed under **Section 3.1, Process Overview**. The factors include building age, specifically, buildings more than 30 years old. Building age is a major factor influencing property valuation and land value as the age of housing is often an indicator of housing conditions. In general, housing that is 30 years or older is considered an older building as it may begin to need costly repairs. The second factor is identifying sites that are undervalued, specifically, with an assessed land-to-improvement (LTI) ratio less than 1. Improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value. The third factor is underbuilt sites, this specifically identified commercially zoned sites where the current floor area ratio compared to the maximum allowable floor area ratio is less than 100 percent. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt. The fourth factor is resource access which looks at TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households. Lastly, sites were identified utilizing City local knowledge of property owner interest to sell or of developer interest to redevelop.

The sites selected in Table 7, are likely to be developed for lower-income RHNA as tThe existing structures are not considered an impediment to development due to their current uses, building age, current conditions indicating a likely need for substantial repairs, and low LTI ratios as described above. Two of the sites include two or more parcels with the realistic potential for consolidation: sites identified as Table ID 1 and 2. Based on recent trends for projects in the pipeline, which include the redevelopment of underutilized parcels consolidated into one project site (see **Section 5, Planned, Approved, and Prospective Projects**), it is reasonable to assume that sites identified as Table ID 1 and 2 can be consolidated as one site. Similar to the projects in the pipeline, the uses on these lots are underutilized, and programs in the Housing Element provide incentives for lot consolidation. For example, Program ~~1316, Lot Consolidation Incentive~~, provides an additional density bonus above and beyond what is permitted under State law and includes provisions for the City to assist affordable housing developers in identifying opportunities for lot consolidation. Residential developments meeting the minimum requirements for a density bonus are granted an additional bonus in exchange for lot consolidation. The existing Manhattan Village Senior Villas located at 1300 Parkview Avenue, and the future Verandas Project located at 401 Rosecrans Avenue and the 1701–1707 Artesia Project are examples of residential projects developed on multiple parcels that include units affordable to very low-, low-, and moderate-income households. The Verandas Project and 1701–1707 Artesia Project are further detailed in Section 5 and are credited toward the 6th Cycle planning period RHNA. The following subsections below (4.1.3.1 - 4.1.3.3) provide site specific details of how the City will ensure existing uses can adequately accommodate the lower-income RHNA.

#### 4.1.3 Analysis of Impediments to Development on Underutilized Sites

Since there are no vacant parcels in the City, a common challenge was finding sites with existing uses that would not be considered an impediment for development of lower-income units. Specifically, identifying sites with existing residential uses which would yield a great amount of net new units. As previously mentioned, residentially zoned land in the City is already developed with residential uses. was another challenge in identifying lower income sites. From a high-level overview there appears to be many contiguous parcels that could potentially accommodate lower-income units. However, when

calculating the realistic capacity at 20 ~~du per acre~~dwelling units per acre, many parcels yielded negative or 0 net new units. Meaning that identifying these sites is not feasible as the units would only be replaced. Many parcels yielded low or negative net new unitsThis is due to small parcel sizes and/or existing residential units built at higher densities. **Table 6, Example Site**, provides an example of one of the major and common challenges in identifying lower-income sites that meet both HCD’s criteria and yield enough net new units to be considered feasible from a redevelopment perspective. This is particularly important when identifying lower-income sites because existing uses cannot be an impediment to development. While the parcels in the example site can be consolidated to meet the acreage criteria, only five net new units are yielded when accounting for the existing 19 units and their current tenants—likely rendering the site unfeasible from an affordable housing development perspective.

<b>Table 6. Example Site</b>				
<b>Assessor's Parcel Numbers</b>	<b>Acres</b>	<b>Uses</b>	<b>Existing Units</b>	<b>Net New Units</b>
4167-014-017 4167-014-016 4167-014-015 4167-014-014	0.56	Four quadplexes	19	5

To ensure net new units when identifying existing capacity for redevelopment across all income levels in the City and in compliance with Senate Bill 330 (2019), the approach used was to focus on parcels with commercial uses that permit residential development because those generally yielded a higher number of units. And as previously discussed in Section 3.3.1, development trends in the City indicate residential properties developed on commercial zoned properties typically achieve the maximum density. As such, the realistic capacity considered the development on residential properties on commercially zoned parcels. Many of the parcels were then filtered out because their existing uses were considered an impediment to development (e.g., well-known franchises) because it was not foreseen that the nature of the business would discontinue within the planning period. However, the underutilized sites ultimately selected for accommodating the lower-income RHNA have existing uses that are not considered an impediment to development, and their current uses are reasonably assumed to be discontinued during the planning period. The following subsections below (4.1.3.1 - 4.1.3.3) provide site specific details of how the existing uses are not an impediment to lower-income RHNA.

Table 7, ~~Lower-Income Sites Identified~~, details the underutilized sites identified as appropriate to accommodate the lower-income RHNA and expected net new units based on the realistic capacity assumptions.



**Table 7. Lower-Income Sites Identified**

Table ID	APNs	Consolidated Site <u>Number</u> <u>Letter</u>	Address	Zone	Area District	Acres	Existing Uses	Net New Units
1	4137-001-900* 4137-001-904 4137-001-905 <del>4137-001-027</del> 4137-001-906	<del>4</del> A	Rosecrans Ave./ Highland Ave.	CNE	<del>3</del> III	0.54 <del>33</del>	Small scale office park with a real estate agent office, closed chiropractor office, and a Sports Bar (APN 4137-001-027, LTI ratio 0.52, built 1977) with a City-owned parking structure (APNs 4137-001-900, 4137-001-904, 4137-001-905, 4137-001-906).	<del>4</del> 6
2	4170-026-003* 4170-026-004*	<del>2</del> B	1026–1030 Manhattan Beach Blvd.	CL	<del>4</del> I	0.49	Remax offices, stand-alone building with a surface parking lot (APN 4170-026-003, LTI ratio 0.30, built 1953) and two-story stand-alone vacated Pilates studio with surface parking lot (APN 4170-026-004, LTI ratio 0.38, built 1964).	9
3	4163-024-028	N/A	1535 Artesia Blvd.	RH	<del>4</del> I	0.46	Masonic Center with surface parking lot (LTI ratio 0.97, built 1963).	9
Total	—	—	—	—	—	1.49 <del>28</del>	—	<del>24</del> 8

Notes: Parcels with an asterisk (\*) are non-vacant parcels identified in the 5th Cycle Housing Element.  
APN = Assessor’s Parcel Number; LTI = land-to-improvement

4.1.3.1 Site 1

Site 1, labeled as “Table ID 1” in Table 7, is composed of ~~five~~ four ~~lots~~ parcels ~~reasonably expected to be consolidated into one site~~ and totals ~~0.5433~~ 0.49 acres ~~to identify 6 net new units.~~ The uses include ~~is a parking lot facility made up of four City owned parcels (APNs 4137-001-900, 4137-001-904, 4137-001-905, 4137-001-906).that is publicly owned by the City, and a small scale office park composed of three connecting two-story structures built in 1977 with an LTI ratio of 0.52.~~

The parking lot facility is not considered to be an impediment to development as the location is at the intersection of an area prime for redevelopment and recent development trends indicate parking lot redevelopment is feasible. For example, a proposed project in the City of Pasadena is slated to replace a parking lot with 105 residential units and also includes provisions for a semi-subterranean parking for 162 vehicles. Other examples of an increasing trend to redevelop parking spaces in Southern California include north of the City in the City of Santa Monica. The project includes the replacement of a parking lot facility in Downtown Santa Monica with an affordable housing component. The City of Mountain View in northern California has also recently approved a project from the nonprofit Alta Housing that would bring 120 affordable housing units to a city-owned parking lot. As vacant land has become scarcer, cities in California are looking to their city-owned parking lots as a mean to provide much needed affordable housing. Further, parking will not be lost as new development will require parking subject to the standards in the City’s Zoning Code. ~~Although the~~ While the City does not currently have plans to sell the land, and the land is not designated as surplus land; ~~however,~~ if developer interest would arise, the City would work with the developer to analyze the feasibility of development, and comply with the guidelines and regulations outlined in Assembly Bill (AB) 1486, Surplus Lands Act. As

part of Program 30, Surplus Lands, of the Housing Element, the City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Report in accordance with the requirements of AB 1486 (2019). If the City identifies any public land that they intend to declare as surplus land at any point, the City will send notices about available, surplus local public land to HCD, local public entities within the jurisdiction where the surplus local land is located, and any developers who have notified HCD of their interest in developing affordable housing on surplus local public land in accordance with the requirements set forth in the Surplus Land Act (Government Code Section 54220-54234). (See Program 26).

Current tenants include an eating establishment known as Summer's Sports Bar, a State Farm Insurance agent office, and a recently closed chiropractor office. The four parcels have common ownership and through the lot consolidation program (Program 16) the City provides incentives for lot consolidation by allowing sites greater 0.3 acres identified in this Sites Analysis, an additional density bonus. Program 16 also includes provisions for the City to assist affordable housing developers in identifying opportunities for lot consolidation such as this one. It should also be noted that one parcel identified on this site (APN 4137-001-900) has been previously identified as a non-vacant site in the 5th Cycle, therefore, an additional incentive is available on this site through Program 7 which allows by-right development when 20 percent of the units proposed are affordable to lower-income households. This site has very strong redevelopment potential, and recent trends indicate this area is prime for redevelopment. Abutting this site is the location of a proposed 79-unit residential housing redevelopment project, detailed in Section 5.1, Verandas – 401 Rosecrans Avenue, which indicates developer interest for residential development in this area. The City will identify and track surplus City-owned sites in accordance with the requirements of Assembly Bill 1486; refer to see Program 26 30, Surplus Lands, of the Housing Element.

#### 4.1.3.2 Site 2

Site 2, labeled as "Table ID 2," is composed of two parcels reasonably expected to be consolidated into one site with a total acreage of 0.49 and 9 net new units located along Manhattan Beach Boulevard. Manhattan Beach Boulevard has a mix of existing uses, including commercial; retail; offices spaces; and residential units such as duplexes, condos, and apartments. One of the parcels currently has a vacated two-story building with a surface parking lot that was previously a Pilates studio (APN 4170-026-004). The use is not considered an impediment to development as the building is vacated, and the building is considered older, was built in 1964, and undervalued as it has an LTI ratio of 0.38. The second parcel, APN 4170-026-003, is an irregularly shaped stand-alone building occupied by Remax real estate agency with surface parking in the rear. The building is considered underutilized, and the use is expected to discontinue within the planning period as the building is over 58 years old and is beginning to need major repairs. The LTI ratio was also analyzed to determine the potential for redevelopment. With a low was built in 1963 and has an LTI ratio of 0.30, it can be expected that this site will draw developer interest as the assessed value of the land is greater than the assessed improvement value, meaning there is a higher return on investment. The parcels are owned by individual entities and do not share common ownership; however, this is not considered to impede lot consolidation as recent projects in the City have successfully consolidated parcels that did not share ownership- (see Section 5.2 for details). Again, through Program 16, the City is facilitating lot consolidation on this site by providing density incentives for sites identified in the Sites Inventory greater than 0.3 acres. Further both parcels

have been previously identified as non-vacant sites in the 5th Cycle, therefore, an additional incentive is available on this site through Program 7 which again allows by-right development when 20 percent of the units proposed are affordable to lower-income households. Considering the nature of the underutilized sites, and factors described above, the site is prime for redevelopment. Through programs and incentives in the housing element, the City is ensuring the site can realistically be developed for lower-income households.

#### 4.1.3.3 Site 3

Site 3, labeled as “Table ID 3,” is a square-shaped parcel with a standalone building oriented toward the northside of the property. The parcel, APN 4163-024-028, is currently the location of the Beach Cities Masonic Center and with a large surface parking lot on the southern area of the lot. The site is located along Artesia Boulevard and is surrounded by multifamily residential uses along Artesia Boulevard, and single-family residential housing to the rear of the property north of the property line. The use itself is not a franchise nor considered an essential business and is considered marginal. Thus, the use will not impede residential development. Additionally, the conditions of the building and parking lot are in need of repair. The building is 59 years old, built in 1963, and has an LTI of 0.97, which indicates the land is undervalued. An improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value. The building was built in 1963 and has an LTI ratio of 0.97.

The Site 3 is located in an area of the City where there is both developer and property owner interest to redevelop and sell property. Additionally, it Site 3 is located one block west of the future-planned mixed-used commercial and residential project detailed in Section 5.2, 1701–1707 Artesia, indicating developer interest in this area. West of Site 3, on the northeast corner of Sepulveda Blvd. and Artesia Blvd., there is known interest from the property owner to sell this commercial property. Site 3 does not require lot consolidation but is considered a small site under HCD criteria, this residential parcel is one of the larger parcels found in the City at 0.46 acres as the median parcel size in the City is 0.06 acres, see Section 4.1.1, Size of Sites and Lot Consolidation, for details. Nonetheless, through programs in the Housing Element the City is facilitating potential development on this site. For example, through Program 11, the project may qualify for a density bonus pursuant to the requirements under State law. Through Program 12, Developer Outreach and Transparency, the City will work with the development community to identify ways that lower-income housing may be provided and will educate developers as to how density bonus regulation could be used to facilitate the development of affordable housing.

See Section 7, Sites Identified for Adequate Sites Program, for sites identified to accommodate the lower-income shortfall.

#### 4.1.34.1.4 Sites Identified in Previous Housing Elements

Per Government Code Section 65583.2(c), a non-vacant parcel identified in a previous planning period cannot be used to accommodate the lower-income RHNA unless the parcel is subject to a program in the Housing Element to allow residential uses by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households. As described in the site-specific analysis in the section above, the City has identified three non-vacant parcels (Assessor's Parcel Number 4137-001-900, 4170-026-003, and 4170-026-004. See Sites Table ID 1 and 2 in Table 7, Lower Income Sites Identified) to accommodate lower-income units that were previously identified in the 5th Cycle Housing Element. Therefore, the subject sites (Table ID 1 and 2 in Table 157), Potential Underutilized Sites for

Overlay and Rezone) are subject to Program 28-7, By Right Development, of the Housing Element for previously identified sites per State law.

## 4.2 Moderate-Income Sites

Sites inventoried at the moderate-income level were identified in the RM, RH, and commercially zoned districts permitting multifamily and mixed-uses (CL, CNE, and CD). Although the minimum acreage criterion does not apply to these moderate-income sites, there were limited sites available when considering the underutilized methodology previously described (building age, undervalued, and underbuilt). A total of 24 sites were identified on non-vacant parcels considered underutilized with a total of 158 net new units. Of the 24 sites, 10 sites include the potential for consolidating parcels. The sites which include multiple parcels were selected as such due to the similar conditions of the abutting parcels including undervaluation, building age, and underbuilt. Through Program 16 of the Housing Element, the City is supporting the consolidation of these sites as it incentivizes lot consolidation by providing a density bonus for sites greater than 0.3 acres identified in the Sites Inventory.

-The general uses of the sites identified included commercial, retail, and some older residential uses. Again, uses such as franchises were filtered out of the sites inventory. The Sites Inventory analysis focused on selecting sites which showed a visual need for repair, were undervalued, older buildings and have a vacated status or an existing use that is considered marginalized and expected to be discontinued in the planning period. Most of the buildings were built before 1970, and the average LTI ratio is 0.38. Again, mMany of the buildings visually appear to be in need of repair, and some had uses that were recently vacated. **Table 8, Moderate-Income Sites Identified**, lists the underutilized sites identified to meet the moderate-income RHNA, a description of the existing uses, and expected net new units based on the realistic capacity assumptions identified on Table 5.

**Table 8. Moderate-Income Sites Identified**

Table ID	APNs	Consolidated Site Number/Letter	Address	Zone	Area District	Acres	Existing Uses	Net New Units
<del>44</del>	4164016002 4164016003 4164016001	<del>3C</del>	Manhattan Beach/Harkness	CL	<del>41</del>	0.34	Stand-alone building with a vacated commercial space (APN 4164016002, LTI ratio 0.70, built 1952); stand-alone building with a vacated office space (APN 4164046003, LTI ratio 0.26, built 1952); mixed-use lot with a commercial building built in 1952; one residential unit building built in 1954 (APN 4164016001, LTI ratio 0.20).	11
<del>25</del>	4164016010	N/A	1716 Manhattan Beach Blvd	CL	<del>41</del>	0.11	Stand-alone real estate office (LTI ratio 0.15, built 1955).	4
<del>36</del>	4170010014	N/A	939 Manhattan Beach Blvd	CL	<del>211</del>	0.09	Two-story beauty salon (LTI ratio 0.19, built 1958).	3
<del>47</del>	4170011015 4170011014	<del>4D</del>	Walnut/Manhattan Beach	CL	<del>211</del>	0.20	Law office with surface parking (APN 4170011015, LTI ratio 0.50, built 1952); stand-alone dentistry office with surface parking (APN 4170011014, LTI ratio 0.69, built 1964).	6
<del>58</del>	4170011010 4170011011 4170011012	<del>5E</del>	Poinsettia/Manhattan Beach	CL	<del>211</del>	0.29	Stand-alone tax attorney office with surface parking (APN 4170011010, LTI ratio 0.64, built 1963); two-story real estate agent office with surface parking (APN 4170011011, LTI ratio 0.42, built 1948); vacated stand-alone building and large surface parking (APN 4170011012, LTI ratio 0.002, built 1958).	10
<del>69</del>	4170023007	N/A	828 Manhattan Beach Blvd	CL	<del>41</del>	0.17	Stand-alone dermatology office with surface parking lot (LTI ratio 0.42, built 1971).	7
<del>710</del>	4163009020	N/A	1633 Artesia Blvd	RH	<del>41</del>	0.30	Single-family residence with one existing residential unit (LTI ratio 0.15, built 1950).	9
<del>811</del>	4170025010 4170025008 4170025009	<del>6E</del>	916–920 Manhattan Beach Blvd.	CL	<del>41</del>	0.36	Single-family residence (APN 4170025010, one existing unit, LTI ratio 0.12, built 1941); two-story insurance agent office with surface parking (APN 4170025008, LTI ratio 0.92, built 1978); triplex (APN 4170025009, three existing residential units, LTI ratio 0.24, built 1949).	9
<del>912</del>	4179004001	N/A	1212 Highland Ave	CD	<del>3111</del>	0.15	Stand-alone two-story building with a chiropractor office, real estate agent office, and surface parking lot (LTI ratio 0.35, built 1946).	6
<del>1013</del>	4179020012 4179020001 4179020013	<del>7G</del>	Manhattan Ave/Manhattan Beach Blvd.	CD	<del>1113</del>	0.11	Stand-alone clothing retail store (APN 4179020012, LTI ratio 0.27, built 1947); ice cream shop (APN 4179020001, LTI ratio 0.40, built 1940); stand-alone gift shop (APN 4179020013, LTI ratio 0.09, built 1923).	4
<del>1114</del>	4179028001	N/A	1419 Highland Avenue	CD	<del>3111</del>	0.08	Irregular-shaped stand-alone building with a real estate agency office and abutting angled surface parking (LTI ratio 0.31, built 1956).	3
<del>1215</del>	4175024023	N/A	3515 Highland Avenue	CNE-D5/RH	<del>3111</del>	0.093	Stand-alone hair salon with a small surface parking lot (LTI ratio 0.98, built 1965).	3

**Table 8. Moderate-Income Sites Identified**

Table ID	APNs	Consolidated Site Number <sup>Lette</sup> <u>r</u>	Address	Zone	Area District	Acres	Existing Uses	Net New Units
<del>1316</del>	4137009058	N/A	4005 Highland Avenue	CNE	<del>4IV</del>	0.13	Stand-alone vacated gym with small surface parking (LTI ratio 0.79, built 1970).	5
<del>1417</del>	4170009800	N/A	953 Manhattan Beach Blvd.	CL	<del>2II</del>	0.59	Telecommunications office building with large surface parking lot (built 1960).	20
<del>1518</del>	4166009008	N/A	1426 12th Street	RH	<del>2II</del>	0.24	Duplex (two existing units, LTI ratio 0.31, built 1942).	6
<del>1619</del>	4166010006	N/A	1324 12th St.	RH	<del>2II</del>	0.16	Single-family residence (one existing unit, LTI ratio 0.27, built 1953).	4
<del>1720</del>	4166010008	N/A	1314 12th St	RH	<del>2II</del>	0.16	Single-family residence (one existing, LTI ratio 0.32, built 1956).	4
<del>1821</del>	4170024008 4170024009	<del>8H</del>	852 Manhattan Beach Blvd 848 Manhattan Beach Blvd	CL	<del>4I</del>	0.19	Mixed-use lot with two stand-alone buildings: the building abutting Manhattan Beach Blvd. is a tax preparation office, the second building has one existing residential unit (APN 4170024008, LTI ratio 0.24, built 1952); stand-alone vacated office building (APN 4170024009, LTI ratio 0.41, built 1940).	5
<del>1922</del>	4170014008 4170014009	<del>9I</del>	1441–1445 Poinsettia Ave	CL	<del>2II</del>	0.16	Single-family residence, detached unit (APN 4170014008, LTI ratio 0.30, built 1928); single-family residence, detached (APN 4170014009, LTI ratio 0.03, built 1940).	3
<del>2023</del>	4166008016	N/A	1451 12th St	RH	<del>2II</del>	0.17	Duplex (two existing residential, LTI ratio 0.60, built 1954).	4
<del>21</del>	<del>4169024004</del> <del>4169024005</del>	<del>10</del>	<del>1038 Duncan Ave</del> <del>1041 Boundary Pl</del>	<del>RM</del>	<del>4I</del>	<del>0.55</del>	<del>Single family residence, detached (APN 4169024004, LTI ratio 0.25, built 1934); single family residence, detached (APN 4169024005, LTI ratio 0.01, built 1937).</del>	<del>3</del>
<del>2224</del>	4170008027 4170008028	<del>11J</del>	1011–1019 Manhattan Beach Blvd.	CL	<del>2II</del>	0.39	Design studio (APN 4170008027, LTI ratio 0.14, built 1963); stand-alone restaurant with large surface parking lot (APN 4170008028, LTI ratio 0.44, built 1952).	13
<del>2325</del>	4175017007 4175017009	<del>12K</del>	3514 Highland Ave 3520 Highland Ave	CNE-D5	<del>3III</del>	0.08	Stand-alone two-story insurance agency office with surface parking (APN 4175017007, LTI ratio 0.81, built 1965); commercial building with a spa (APN 4175017009, LTI ratio 0.88, built 1936).	3
<del>2426</del>	4175016027 4175016015 4175016022	<del>13L</del>	Highland/ Rosecrans	CNE	<del>3III</del>	0.24	El Porto Building, closed sushi restaurant, barbershop, yoga studio, escrow office, and pub, seven existing residential units, building for sale (APN 4175016027, LTI ratio 0.29, built 1953); real estate and escrow office (APN 4175016015, LTI ratio 0.48, built 1948); restaurant and pub (APN 4175016022, LTI ratio 0.31, built 1949).	6
<del>2527</del>	4163008038	N/A	1711 Artesia Blvd.	CL	<del>4I</del>	0.31	Graphic design office, <del>hair fitness</del> permanently closed beauty salon that is vacated, surface parking lot (LTI ratio 0.39, built 1959).	10
Total	—	—	—	—	—	5.1166	—	<del>16158</del>

APN = Assessor's Parcel Number; LTI = land-to-improvement; N/A = not applicable



### 4.3 Above Moderate-Income Sites

Sites with luxury units or above moderate-income units as planned for the residential development in the pipeline were identified as having the capacity to accommodate the majority of the above moderate-income sites; see Section 5, Planned, Approved, and Prospective Projects, for full details. While most of the units are accounted for through pipeline development expected to be completed during the planning period, the sites identified to accommodate the remaining above moderate-income RHNA are listed in **Table 9, Above Moderate-Income Sites Identified**. Per HCD criteria, none of the sites identified for above moderate-income are considered vacant, therefore the City relied on non-vacant ~~The~~ underutilized sites. The underutilized sites were selected based on the methodology described in Section 3.1. The Sites Analysis identified existing capacity for 11 sites, a total of 19 units for the above moderate-income RHNA. Specifically, ~~were~~ identified in the RM, RH, and commercially zoned districts permitting multifamily and mixed uses (CD and CNE). The existing uses on the sites identified include office spaces, restaurants, and single-family residences located in older buildings that appear in need of repairs, as well as dilapidated parking lots and empty parcels. None of the sites are identified require lot consolidation. Through Program 20, Objective Design Standards, the City will increase transparency and certainty in the development process through objective design standards.

**Table 9. Above Moderate-Income Sites Identified**

Table ID	APN	Address	Zone	Area District	Acres	Uses	Net New Units
<del>4</del> 28	4179004005	315 12th St	CD	<del>3</del> III	0.06	Surface parking lot (LTI ratio 0.01)	2
<del>2</del> 29	4179022029	1213 Manhattan Avenue	CD	<del>3</del> III	0.03	Stand-alone dentistry office (LTI ratio 0.51, built 1924)	1
<del>3</del> 30	4179028025	1409 Highland Avenue	CD	<del>3</del> III	0.074	Stand-alone real estate office (LTI ratio 0.27, built 1989)	3
<del>4</del> 31	4137010006	3917 Highland Avenue	CNE	<del>4</del> IV	0.04	Surface parking lot (LTI ratio 0.02)	1
<del>5</del> 32	4137008057	41st/Highland	CNE	<del>4</del> IV	0.06	Surface parking lot (LTI ratio 0.006)	2
<del>6</del> 33	4175016005	316 Rosecrans Ave	CNE	<del>3</del> III	0.06	Stand-alone restaurant (LTI ratio 0.08, built 1939)	2
<del>7</del> 34	4137002016	Rosecrans/Vista	CNE	<del>4</del> IV	0.04	Empty parking lot (LTI ratio N/A)	1
<del>8</del> 35	4137010022	Porto/Ocean	RH	<del>4</del> IV	0.03	Empty parking lot (LTI ratio N/A)	1
<del>9</del> 36	4179014013	815 Manhattan Ave	CD	<del>3</del> III	0.06	Office building, clothing store, and furniture store (LTI ratio 0.26, built 1972)	2
<del>10</del> 37	4166008007	1407 12th St	RH	<del>2</del> I	0.12	Single-family residence, one existing unit (LTI ratio 0.08, Built 1956)	3
<del>11</del> 38	4166008002	1416 15th St	RM	<del>2</del> I	0.17	SFR, 1 existing unit (LTI ratio 0.42, Built 1954)	1
Total	-	-	-		0.74	-	19



## 5 Planned, Approved, and Prospective Projects

Two development projects in the pipeline are seeking entitlements or have prospective development expected to be built within the planning period. One of the pipeline projects is a multifamily residential project, and the other is a mixed-use project, both of which will be redevelopment projects on non-vacant parcels. There are a number of other projects in the City with residential units, such as single-unit developments, that have not been included in this Sites Inventory but are expected to be completed during the planning period.

In addition to the pipeline projects, ADUs projected to be constructed during the planning period may be credited toward capacity to accommodate the RHNA. The following sections provide a description of pipeline projects and ADU projections for the planning period.

### 5.1 Verandas – 401 Rosecrans Avenue

Verandas is located at 401 Rosecrans Avenue and 3770 Highland Avenue on two abutting parcels with common ownership, with a total acreage of 1.02 acres, and a density achieved of approximately 77.89 units per acre. Although the base zone, CNE in Area District III, allows for a maximum density of 51.2 du per acre, dwelling units per acre, the project was able to achieve a density 152 percent over the maximum permitted. The project is using a density bonus permitted under State law, in addition to a 10 percent bonus through the City's lot consolidation incentive (Program 16). As such, the project consists of 73 above moderate-income multifamily residential units and 6 very low-income units. The project is a redevelopment site replacing an event venue previously known as Verandas Beach House located in the northwest area of the City along Highland Avenue and Rosecrans Avenue. in the CNE zone, Area District 3. The As previously mentioned, the site is located in the CNE zone which allows commercial uses, mixed-use, and multifamily residential uses. This area of the City includes a mix of retail, office, and residential uses along Highland Avenue, and primarily residential uses along Rosecrans Avenue. However, the site is being developed as fully residential without a commercial component.

### 5.2 1701–1707 Artesia

The 1701–1707 Artesia Project is mixed-use project in the CL zone, Area District 4, consisting of 649 square feet of commercial space and 14 residential units, including 1 very low-income unit. This project will redevelop the site on two parcels, under separate ownership, replacing a closed antique shop and a detached single-family residence located along the southern border of the City along Artesia Boulevard, at the northeast corner of south Redondo Avenue and Artesia Boulevard. The consolidated site is approximately 0.3 acres and developed at a density of approximately 46.6 units per acre. While the base zone permits a maximum of 43.6 per acre, the project achieved a 117 percent of the maximum permitted density by utilizing . The project will also use a density bonus permitted as allowed under State law.

### 5.3 Summary of Residential Projects in Pipeline

In total, 93 units are part of planned, approved, or prospective projects expected to be built within the planning period that are counted toward meeting the 6th Cycle RHNA. Based on affordability restrictions, the projects are anticipated to provide a total of seven very low-income units (included under lower-income units in **Table 10**), and 86 above moderate-income units. The projects summarized above are listed in **Table 10, Pipeline Residential Development Credited Toward 6th Cycle RHNA**.

Table 10. Pipeline Residential Development Credited Toward 6th Cycle RHNA				
Project	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units Credited Toward 6th Cycle RHNA
Verandas – 401 Rosecrans Ave.	6	—	73	79
1701–1707 Artesia Blvd.	1	—	13	14
Totals	7	—	86	93

Source: City of Manhattan Beach  
RHNA = Regional Housing Needs Allocation

## 5.4 Accessory Dwelling Unit Projection

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of ADUs and junior accessory dwelling units (JADUs) to be developed within the RHNA projection period. The number of ADUs and JADUs that can be credited toward potential development must be based on the following factors:

- ADU and JADU development trends since January 2018
- Community need and demand for ADUs and JADUs
- Resources and incentives available to encourage their development
- The availability of ADUs and JADUs for occupancy
- The anticipated affordability of ADUs and JADUs

Recent changes to legislation governing the development and provision of ADUs and JADUs have sparked growth in these units in cities across California, including Manhattan Beach. The City is entirely built out and urbanized, and ADU and JADU production is an ideal strategy for producing needed housing while capitalizing on existing infrastructure, such as water and sewer. Additionally, this is often a strategy that is more easily accepted by stakeholders who may be resistant to change because these units provide a form of “unseen” density that is palatable to many.

Although from 2017 to 2019 only three ADUs were permitted and constructed in the City, from January 2020 to date (October 2021), the City has issued eight permits. **Table 11, Accessory Dwelling Unit and Junior Accessory Dwelling Unit Development Trends**, details recent ADU and JADU development in the City.

Table 11. Accessory Dwelling Unit and Junior Accessory Dwelling Unit Development Trends	
Year	Permitted Units
2017–2019	3
2020	3
2021 to date (October 2021)	8

Source: HCD Housing Element Implementation and APR Data Dashboard, 2021

Because ADU and JADU legislation has been revised several times since 2017, providing increased opportunities for the development of housing, it is expected that development trends will continue in an upward trajectory. An Interim ADU Ordinance was in place through 2020 in accordance with updated State laws, and in January 2021, the City Council adopted the City’s local ADU and JADU Ordinance that is currently in place. The City’s ADU Ordinance, adopted in January 2021, contains provisions that go beyond those set forth in State law, as follows:

- Consistent with State law, the City permits one ADU and one JADU per lot. Alternatively, to offer more flexibility, the City permits two ADUs on a lot with a proposed or existing single-family dwelling.
- The City permits ADUs for existing multifamily dwelling units, consistent with State law. In addition, the City permits one ADU on a lot with a newly constructed multifamily development.

As of October 2021, eight ADUs have been permitted in 2021 and 22 ADU permit applications are in review. To account for this increased potential, this Sites Analysis used the upward trends and sharp increase in ADU construction since January 2018 to estimate new production; however, this only accounts for the effect of new laws without local incentives, such as the public engagement and informational tools to streamline the approval process and market ADU construction that will be implemented as part of Program 1, Accessory Dwelling Units Program, identified as part of the City’s Housing Element, and the recent ADU Ordinance adopted in January 2021. Based on the local incentives, ADU and JADU trends since January 2018, recent upward trends in 2021, and permits currently under City review, a conservative estimate of the number of units to be produced under this approach is 10 units each year during the 6th Cycle RHNA projection period (June 30, 2021 – October 15, 2029), for a total of 83 units.

In addition to calculating the expected number of ADUs and JADUs to be developed within the projection period, the Sites Inventory must calculate the anticipated affordability of ADUs and JADUs to determine which RHNA income categories they should be counted toward. To facilitate the ADU affordability assumptions for jurisdictions, SCAG conducted the Regional Accessory Dwelling Unit Affordability Analysis.<sup>2</sup> As part of the analysis, SCAG conducted a survey of rents of 150 existing ADUs from April through June 2020. Efforts were made to reflect the geographic distribution, size, and other characteristics of ADUs across counties and subregions. For example, Los Angeles County is separated into two categories, Los Angeles County I and Los Angeles County II, to better account for the disparities in housing costs between coastal and inland jurisdictions.

SCAG concluded that 23.5 percent of ADUs were affordable to very low-income households. Based on these assumptions, of the total 83 ADUs that are projected to be built during the planning period, 14 are estimated to be affordable to very low-income households, 36 to low-income households, 5 to moderate-income households, and 28 to above moderate-income households. **Table 12, Estimated Affordability of Projected ADUs 2021–2029**, shows the assumptions for ADU affordability based on the SCAG survey for Los Angeles County II.<sup>3</sup>

In coordination with the updated policies and programs in the Housing Element and the City’s ongoing efforts to promote the development of ADUs and JADUs, it is likely that these units will be produced at a much higher rate. The programs of the Housing Element aggressively promote and incentivize the production of ADUs and JADUs.

Income Level	Percent of ADUs	Projected Number of ADUs
Very Low-Income	17%	14
Low-Income	43%	36
Moderate-Income	6%	5

<sup>2</sup> [https://scag.ca.gov/sites/main/files/file-attachments/adu\\_affordability\\_analysis\\_120120v2.pdf?1606868527](https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527)

<sup>3</sup> The survey separated Los Angeles County into two categories. Los Angeles County I includes the City of Los Angeles, Las Virgenes-Malibu, South Bay cities, and Westside cities, and Los Angeles County II includes all other Los Angeles County jurisdictions. The affordability assumptions for Los Angeles County II are reflected in this Sites Inventory.

Table 12. Estimated Affordability of Projected ADUs 2021–2029		
Income Level	Percent of ADUs	Projected Number of ADUs
Above Moderate-Income	34%	28
Total	100%	83

Source: SCAG Regional Accessory Dwelling Unit Affordability Analysis, 2020  
ADU = accessory dwelling unit

## 6 Summary of Capacity to Accommodate the RHNA

The City of Manhattan Beach is an urbanized community in the South Bay area of Los Angeles County. Due to the built-out nature of the City, small parcel sizes, and high-density build out in parcels adequately zoned for lower-income units, the availability of adequate sites is limited. The City identified capacity for housing through underutilized sites that meet zoning density requirements, have older structures, and have an assessed LTI ratio of less than 1. The underutilization of these sites paired with the programs of the Housing Element such as programs 1, 7, 11, 16, and 20 will ensure that the City can realistically meet the RHNA targets at all income levels for the 6th Cycle, and provide additional sites for a buffer, ensuring that capacity remains throughout the Housing Element planning period.

**Table 13, Summary of Residential Capacity and Credit Toward RHNA**, shows the breakdown of all existing capacity, projected ADUs, and credits to be counted toward the RHNA, and compares these numbers to the City’s assigned 6th Cycle RHNA. The “total capacity (net new units)” identified in this table does not reflect the additional capacity that would be captured through an overlay or rezone. The capacity deficit by income category, as detailed below, will be accommodated through an Adequate Sites Program.

As shown in Table 13, the City has a total capacity for ~~85-81~~ lower-income units, ~~166-163~~ moderate-income units, and 133 above-moderate income units within the residential pipeline of projects, underutilized sites, and through the expected number of ADUs and JADUs. The lower-income RHNA is not met through this current capacity, as there is a shortfall of ~~492-406~~ units; however, the City will accommodate the shortfall through **Program 2, Adequate Sites**, of the Housing Element. Through implementation of Program 2, the City will establish an overlay district that encompasses a minimum of ~~20.4-3~~ acres of sites in the General Commercial (CG) and Planned Development (PD) Districts to accommodate the remaining lower-income RHNA. The overlay district will create the opportunity for at least ~~402-406~~ units of housing appropriate to accommodate lower-income households. Separately from Program 2, the City will rezone and select sites from the overlay district to create an opportunity for an additional 3.65 acres of sites to accommodate a buffer of at least 15 percent (approximately 73 units), as recommended by HCD, to ensure sufficient capacity exists to accommodate the RHNA throughout the planning period and to comply with the provisions of Senate Bill 166 (2017).

**Table 14, Additional Site Capacity**, identifies the number of units in terms of acreage for the shortfall of lower-income units that will be accommodated through Program 2, and the number of units in terms of acreage that will ~~create to provide an opportunity for~~ a buffer of at least 15 percent for lower-income sites, as recommended by HCD, through rezoning and the overlay district. The acreage needed is assumed using a realistic capacity of 20 ~~du per acre~~dwelling units per acre, based on the minimum density requirements of the Adequate Sites Program.

**Table 13. Summary of Residential Capacity Compared to 6th Cycle RHNA by Income, City of Manhattan Beach, June 30, 2021 through October 31, 2029**

Category	Total Units	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units
RHNA	774	487	155	132
Underutilized Site Capacity (Net New Units)	<del>208</del> <u>201</u>	<del>28</del> <u>24</u>	<del>161</del> <u>158</u>	19
Vacant Site Capacity	0	0	0	0
Pipeline Residential Development Credited Toward RHNA	93	7	0	86
Projected Accessory Dwelling Units	83	50	5	28
<b>Total Capacity (Net New Units)</b>	<del>384</del> <u>377</u>	<del>85</del> <u>81</u>	<del>166</del> <u>163</u>	133
<b>Total Capacity Deficit (-) OR Surplus (+)</b>	—	<del>-402</del> <u>-406</u>	<del>+118</del>	+1
Additional Capacity to Accommodate Shortfall Through Adequate Sites Program Overlay	<del>402</del> <u>406</u>	<del>402</del> <u>406</u>	—	—
Additional Capacity for Buffer Through Rezoning and Overlay	73	73	—	—

RHNA = Regional Housing Needs Allocation

**Table 14. Additional Site Capacity**

	Units	Acreage
Adequate Sites Program Overlay to Address Lower-Income Shortfall	<del>402</del> <u>406</u>	20. <del>4</del> <u>3</u>
Rezone and Overlay to Address Lower-Income Buffer	73	3.65
Total	<del>475</del> <u>479</u>	23. <del>75</del> <u>95</u>

**Figure 1, Northwest Sites Identified**, shows the Veranda planned project, identified on the legend as Pipeline Development Sites, and sites identified for all income levels. area is locally known as El Porto, near Rosecrans Avenue and Highland Avenue. As previously discussed in Section 5.1, the Verandas project includes two parcels consolidated as one site which is shown on the map. **Figure 2, Western Sites Identified**, shows sites selected near Manhattan Beach Boulevard and Highland Avenue, as well as areas west off Sepulveda Boulevard. **Figure 3, Central and Southeast Sites Identified**, shows the 1701–1707 Artesia ~~Boulevard~~ Project, which as previously discussed in Section 5.2, includes two consolidated

| parcels, and other identified sites along Artesia Boulevard and other southern sites, as well sites along Manhattan Beach Boulevard, generally east of Sepulveda Boulevard.

Northwest City Area  
6th Cycle - Sites Identified



Figure 1. Northwest Sites Identified

Western City Area  
6th Cycle - Sites Identified



Figure 2. Western Sites Identified



Central and Southeast City Areas  
6th Cycle - Sites Identified



Figure 3. Central and Southeast Sites Identified

## 7 Sites Identified for Adequate Sites Program

After calculating the City's current capacity on underutilized sites, pipeline projects to be credited toward the RHNA, and projections for ADUs, the City has a deficit or shortfall of ~~402-406~~ units for the lower-income RHNA category. To accommodate the remaining lower-income RHNA, the City identified potential sites in the General Commercial (CG) and Planned Development (PD) zoning districts to be made available to accommodate residential uses appropriate for lower-income households within 3 years and 120 days from the beginning of the planning period. Through implementation of Program 2 of the Housing Element, the City will establish an overlay that encompasses a minimum of ~~20.1-3~~ acres of these sites (see Program 2 for additional details) to accommodate the shortfall of lower-income units. In addition, the City will also rezone and identify sites within the overlay (approximately 3.65 acres total) to accommodate a buffer of at least 15 percent (approximately 73 lower-income units), as recommended by HCD, to ensure sufficient capacity exists to accommodate the RHNA throughout the planning period (see **Program 196, No Net Loss**, of the Housing Element), which is discussed in **Section 7.12**, Sites to Accommodate Lower-Income ~~Shortfall and~~ Buffer. As detailed in Section 7.2, the City was able to identify 5 sites for a total of 26 lower-income buffer units. The remaining need for 47 sites, 2.35 acres, will be identified from the sites identified in Table 15, Potential Underutilized Sites for Overlay, below (see Section 7.2 for details).

### 7.1 Sites to Accommodate Lower-Income Shortfall ~~and Buffer~~

To accommodate the remaining lower-income RHNA and a portion of the lower-income buffer sites, the City will establish an overlay to permit residential uses at a minimum of ~~20 du per acre~~ dwellings units per acre as required per State law (see Program 2 in the Housing Element for program components and requirements). As detailed in Section 4, Existing Capacity, there are various limitations and challenges identifying sites adequate for lower-income RHNA units that meet HCD criteria, including size of sites, as well as unavailability of vacant sites, and availability of residential sites which yield positive net new units. Further, within the CG and PD due to an existing voter initiative, development regulations in the RS, RM, and RH residential zoning districts cannot be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions, or minimum lot area per dwelling unit, unless the amendment is first submitted to a Citywide election and approved by a majority of the voters. zonesAs such, the City is limited to identifying rezoning opportunities for the overlay in the CG and PD zones.

**Table 15, Potential Underutilized Sites for Overlay**, (see ~~Program 2~~ in the Housing Element for program components and requirements). As such, the City has identified identifies qualifying sites within the CG and PD zones that may potentially be included within the overlay to address the lower-income shortfall and portion of the lower-income buffer sites. The following section provides a description of the methodology utilized to identify sites to accommodate the lower-income shortfall and buffer sites.

#### 7.1.1 Non-vacant Sites Selection Methodology

As described in Section 3, there are no vacant sites in the City, therefore, the overlay relies on non-vacant sites. Similar to the underutilized methodology for selecting underutilized sites in Section 3.1, the City reviewed specific factors for identifying and prioritizing underutilized sites for the overlay including:

- **Undervalued** – An assessed land-to-improvement (LTI) ratio less than 1. Improvement values less than 1 is an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement. However, sites with an LTI greater than 1 are also identified in the overlay for sites where there is developer interest, and as it is assumed that that the overlay would increase the value of the land as these sites have not previously allowed for residential development.
- **Under Built** – Commercially zoned sites where the current floor area ratio compared to the maximum allowable floor area ratio is less than 100 percent. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt.
- **Building Age** – Buildings more than 30 years old. Building age is also a major factor influencing property valuation and land value. In general, a building that is 30 years or older is considered older as it may begin to need costly repairs.
- **Resource Access** – Within TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households.
- **Size of Sites.** – Sites that meet or could be consolidated to the acreage criteria of 0.5 per HCD’s recommendation for lower-income unit development.

These initial factors were used to narrow the selection of sites within the City to allow for a more informed approach to selecting sites. Following the selection of sites through the above-mentioned data-driven approach, sites were then further narrowed down through on-the-ground research that looked at the potential to consolidate sites, the feasibility of the redevelopment of the existing use, and any known developer interest that has been revealed through developer discussions with City staff. This included the use of online mapping tools, including Google Earth and Google maps, as well as City knowledge of the current projects in the pipeline and development interest in certain areas of the City. These methods were used to verify building vacancies and the underutilized status of existing uses. The methodology was developed to align with current trends in the City. Table 15 provides the context of each site, including the acreage, potential units, and a description of existing uses, and notes if the site has developer interest or property owner interest to sell. The City is experiencing increased development interest in the areas identified for future development, and multiple inquiries regarding potential housing projects are received on a monthly basis. Through the process of updating the Housing Element, there have been workshops and outreach to developers and property owners (see **Appendix F, Community Engagement Summary** for details on outreach).

### 7.1.2 Existing Uses

An on-the-ground analysis of identified rezone sites indicate that the existing uses will not impede residential development. There are no known existing leases or deed restrictions that would perpetuate the existing use or prevent redevelopment on sites identified on Table 15 and Table 16. As part of the analysis, the City confirmed vacated uses, and underutilized sites by conducting site level analysis of the conditions of the buildings, structures, and general property area which indicate dilapidation and/or poor maintenance. While there is one site identified in Table 15, which is considered a brownfield site, through Program 12, the City is committing to working with the development community to identify ways that lower-income housing can be provided and connecting developers to funding sources

available for this such sites such as the State Brownfield Funding (see Program 12 in the Housing Element). The majority of the sites are selected from the CG zone which does not currently allow for commercial uses. Therefore, in selecting sites, residential components were not a factor impacting the potential for residential development on the sites. In the PD zone, sites are largely underutilized as the parcels are larger ranging from 4 to 7 acres and contain commercial or office building with large, underutilized parking lots. Many of the sites selected include structures that are older with some vacated uses or marginalized uses that can be expected to discontinue within the planning period and are therefore good candidate for redevelopment. In conversation with property owners, the City has documented an increasing interest to sale commercial corner lots and commercial strips along Sepulveda Boulevard. As previously mentioned, the City has no vacant land, therefore, development will occur on infill sites.

### 7.1.3 Development Trends

The City has conducted an analysis of development trends to inform the selection of sites that will form the rezone overlay. According to development trends since 2018, the City has permitted 14 residential building permits for single-family and multifamily housing ranging from 1 to 4 units (see Table 3). These developments are located on zones that permit residential development. As such the City analyzed development trends in the City of El Segundo, Hermosa Beach, and Redondo Beach, as they are coastal cities and have similar land use characteristics as the City. The analysis revealed similar residential development trends of single-family homes, 2-unit condominiums, and few developments of 3 units or more. In the study, it was found that all cities are seeing a recent increase in developer interest for larger multifamily housing developments and mixed-use development particularly, in the City of El Segundo and Redondo Beach. Specific to the City, as noted in Table 3 and detailed in Section 5, there are two planned multifamily residential development projects, a 79-unit residential project and a 14-unit mixed use project, both of which are located along corridors with both residential and commercial uses and are zoned as commercial. Mixed-use developments in the City of Redondo Beach and El Segundo are also located along commercial corridors. These planned development trends reveal a recent increase in development of residential housing in coastal cities. Specifically, along commercial corridors as they have larger parcels than parcels zoned for residential development.

Some of the sites identified as part of the rezone overlay and buffer to ensure capacity through the planning period include identification of various parcels to create one site. The City identified multiple contiguous parcels when reasonably expected to be consolidated into one site. For example, the parcels had similar characteristics, the parcels were part of a larger are (i.e., same shopping center). Sites that include multiple parcels have also been selected as such to ensure compliance with HCD site size criteria. As previously discussed, both planned development projects in the City include lot consolidation; and while Verandas project consolidated parcels under the same ownership, 1701 – 1707 Artesia Project was able to consolidate parcels under separate ownership. Examples of consolidation sites in the City have typically included two parcels, and sites selected for the rezone overlay also identify sites with 3 or more parcels. Therefore, the City also analyzed project trends in surrounding cities to support the selection of sites and found a redevelopment project in the City of Redondo Beach similar in nature with the characteristics of consolidated sites selected for the rezone overlay. The project includes consolidation of 6 parcels to form a 1.26-acre site for proposed mixed-use residential and commercial use. These examples support the consolidation of sites regardless of ownership.

Since development trends for affordable housing in the City are limited, the City's looks to its ADU trends to forecast what can be expected with housing development during the planning period. For example, the City saw very little ADU applications since 2017, received 3 from 2017-2019, 3 in 2020, and saw a sharp increase in 2021. This is directly related to legislative changes which encourage and facilitate the development of ADUs. As such, the City expects to see an increase in more intensive infill housing development as a result of new State legislation and through the implementation of programs included in the Housing Element which facilitate the production of affordable housing. Through Program 19, the City is committing to developing a methodology to track and monitor all development activity to inform remaining capacity need to meet the City's RHNA.

#### 7.1.4 Market Conditions

Housing market conditions are also an important factor in determining the feasibility of residential development on non-vacant sites. The City conducted a market study to inform the feasibility of sites selected to be included as part of the rezone overlay. The study found that there is a limited amount of available land on the market zoned for residential and mixed-use developments. According to Realtor.com the median home value in Manhattan Beach is \$3.1 million which is similar to what other real estate websites such as MB Confidential, Redfin, Zillow, and LoopNet are reporting. Current properties on the market zoned for multifamily development in the City and surrounding cities including Redondo Beach, Hermosa Beach, and El Segundo, revealed that the median parcel size for multifamily development lots is 0.06 acres. Lot acreages ranged from 0.03 acres to 0.17 acres. A notable multifamily development on the market located in El Segundo, included a 31-unit development on a 0.13-acre lot. Small parcel sizes may be contributing to the lack of larger multifamily developments built in the City and surrounding cities as discussed in the previous section.

Another market condition analyzed is the cost of construction. Construction costs depend on the type of construction for example the national average for Type I or II multifamily is \$148.82 to \$168.94 per square foot and Type V Wood Frame multifamily is \$113.88 to \$118.57 per square foot and consider hard cost for materials and land value, and soft costs which includes permitting fees (see Appendix C, Constraint and Zoning Analysis for details). Further, a study of the costs of affordable housing production in California revealed that between 2016 and 2019, the costs to develop a new affordable unit under the Low-Income Housing Tax Credit (LIHTC) program increased from \$425,000 per unit to more than \$480,000 per unit. Coastal cities in California have among the highest land value and building costs in the country which likely exceed the aforementioned national average per square-foot and LIHTC affordable per unit calculations. Therefore, local market conditions related to high land value and construction costs coupled with the limited supply of available and developable land in the City indicate that non-vacant sites selected for the rezone overlay are prime for more intensive, compact, and infill development, including redevelopment and reuse of sites. A main component of securing financing from a lender is directly related to the demand of such development. And as this analysis shows, there is a large demand for housing in the City and along coastal communities. The sites selected for the rezone are financially feasible as the parcels are much larger than what is currently available in the City. A study of the land zoned for CG indicates the median parcel size is 0.21, which is much larger when compared to the median parcel size for zones that allow for multifamily development which is 0.06. As such, the sites selected for the rezone overlay will draw developer interest as there is currently a lack of viable available land in the City. Sites selected for the rezone are selected along commercial corridors since rezone opportunities are limited to CG and PD zones. As previously mentioned, there is an increasing

demand along commercial corridors as they have larger parcels than parcels zoned for residential development. Therefore, in addition to selecting sites where market conditions show the direction of redevelopment opportunities, the sites also comply with the California Tax Credit Allocation Committee (TCAC) opportunity mapping methodologies by identifying capacity for affordable housing near resources such as transit, jobs, grocery stores, and other community resources. Since the primary function of the California TCAC is to oversee the LIHTC program, which provides funding to developers of affordable rental housing, many affordable housing development is often also located near commercial corridors as these areas typically have the highest access to resources.

#### 7.1.5 Availability of Regulatory and/or other Incentives

The City is supporting the development of housing on sites selected to accommodate the RHNA shortfall through various regulatory and financial incentives. Through Program 2, the City will adopt standards for the overlay district to address the RHNA shortfall and will include the following components, sites must allow a minimum of 16 units per site, permit a minimum of 20 dwelling units per acre, allow 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project, permit owner-occupied and rental multifamily uses by right pursuant to Government Code Section 65583.2(i) for developments in which 20 percent or more of the units are affordable to lower-income households. Again, the realistic capacity is based on the minimum ~~du per acre~~dwelling units per acre outlined by State law; however, this does not preclude developers to build at the maximum capacity which will be developed during the planning process (see Program 2 in the Housing Element for more details).

In addition to developing the overlay district standards, through Program 11, the City is committing to updating the Density Bonus Ordinance to ensure is consistent with future amendment to State law. The City supports the density bonus incentives permitted under State law and to further incentivize affordable units, multifamily projects in residential districts that qualify for a density bonus are eligible for a streamlined approval process through **Program 3, Affordable Housing Streamlining and Program 18, Multifamily Residential Development Standards and Streaming in the Mixed-Use Commercial Districts** (see Housing Element programs for details). Through Program 12, the City will actively work with the development community to identify ways that lower-income housing may be provided, including housing for extremely low-income households and those with special housing needs. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households.

To support sites identified as consolidated sites with multiple parcels, the City provides an additional density bonus incentive under Section 10.12.030 of the MBMC above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus. The additional density incentive is granted in exchange for lot consolidation, see Program 16 for details. Through **Program 24, Priority Services**, the City is committing to coordinate with Public Works to ensure that proposed developments that include housing affordable to lower-income households, including extremely low- and very low-income households, are prioritized for the provision of water and sewer services. Internal coordination will further support the prioritization of water and sewer services for future residential development, including units affordable to lower-income

households. Through programs in the housing element and identification of adequate sites for the overlay district, the City is ensuring there is capacity to accommodate the lower-income shortfall.

~~The majority of sites identified as having realistic redevelopment potential within the planning period are considered underutilized. Most of the qualifying underutilized sites were identified under the same criteria detailed in **Section 3**, Vacant and Underutilized Sites Methodology and Assumptions, and **Section 4**, Existing Capacity, for underutilized sites appropriate to accommodate development affordable to lower-income households; however, there are some sites that do not meet the underutilized criteria outlined under **Section 3**, but were selected because there is interest to develop these sites or it is assumed that the overlay would create developer interest because these sites have not previously allowed for residential development.~~

**Table 15. Potential Underutilized Sites for Overlay ~~and~~ Rezone**

Table ID	APNs	Consolidated Site <u>Number</u> <u>Letter</u>	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
1	4169006006 4169006005 4169006007	<del>1</del> A	CG	<del>4</del> I	0.55	10	Two-story office building for MB real estate agency with a surface <del>background</del> parking lot to the rear (APN 4169006006, LTI ratio 0.37; built 1977). Small commercial strip with three stand-alone buildings including a Pilates studio, hair salon, photography studio. State Farm real estate agent office, law office, tanning studio (APN 4169006005, LTI ratio 0.14, built 1954; APN 4169006007, LTI ratio 0.66, built 1987).
2	4173027026 4173027022 4173027021 4173027020 4173027019 4173027024 4173027027 <del>4173027021</del>	<del>2</del> B	CG	<del>2</del> I	1.18	23	Five one-story standalone buildings. A smog check shop (APN 4173027026, LTI ratio 1.05, built 1989). Picture frame shop (APN 4173027022, LTI ratio 0.0003, built 1947) with parking lot (APN 4173027021). Medical offices, including a dermatology, hearing, facial plastic and ENT surgery (APN 4173027019, LTI ratio 3.08, built 1969) and parking lot (APN 4173027020). Standalone building and surface parking lot with an animal hospital, vacated massage spa, and a postal center (APN 4173027027, LTI ratio 0.21, built 1974). Standalone building and surface parking lot with a secondhand store (APN 4173027024, LTI ratio 0.41, built 1948).
3	4171013041 4171013036 4171013030 4171013034 4171013029 4171013039 4171013041	<del>3</del> C	CG	<del>2</del> I	1.48	29	One-story building, same-day COVID-19 testing clinic and vacated spa (APN 4171013036, LTI ratio 0.99, built 1954). Nail salon, coreolgy Pilates studio, sports bar, and dermatology and laser studio center (APN 4171013041, LTI ratio 0.5, built 1961). Printing Office (APN 4171013034, LTI ratio 0.22, built 1947). Real estate group office, printing office and acting studio (APN 4171013039, LTI ratio 0.54, built 1957; LTI ratio 0.22, built 1947). Vacated Enterprise Rent-A-Car with parking lot (APN 4171013030, LTI ratio 0.34, built 1957); LTI ratio 0.004 with a parking lot (APN 4171013029, LTI ratio 0.004).
4	4171014034 4171014035 4171014020 4171014021	<del>4</del> D	CG	<del>2</del> I	0.69	13	Auto repair and tires shop with surface parking (APN 4171014034, LTI ratio 0.66, built 1968). Auto service and repair shop with surface parking (APN 4171014035, LTI ratio 0.30, built 1972). Two-story building with an attorney office (APN 4171014020, LTI ratio 0.33, built 1923) and surface parking associated with attorney office (APN 4171014021, LTI ratio 0.003, built 1950).
5	<del>4170006023</del> 4170006019 4170006018 4170006017 4170006022 4170006015 4170006028 4170006027 4170006013	<del>5</del> E	CG	<del>2</del> I	1.15	21	Stand-alone shipping and mailing store with surface parking (APN 4170006019, LTI ratio 0.26, built 1965). Stand-alone marketing agency (APN 4170006018, LTI ratio 0.06, built 1950). Duplex with two existing residential units (APN 4170006017, LTI ratio 0.22, built 1949). Two-story commercial building with a sports bar and office spaces with a large surface parking lot (APN 4170006022, LTI ratio 0.39, built 1964). Stand-alone commercial building with a tailor and insurance agency office with surface parking (APN 4170006015, LTI ratio 0.26, built 1955). Ingress and egress to surrounding uses (APN 4170006028, LTI ratio N/A). Auto service shop (APN 4170006027, LTI ratio and built N/A). Veterinarian office (APN 4170006013, LTI ratio 0.34, built 1948).



**Table 15. Potential Underutilized Sites for Overlay ~~and~~ Rezone**

Table ID	APNs	Consolidated Site <u>Number</u> <u>Letter</u>	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
6	4170007021 4170007022 4170007017 4170007016	<del>6E</del>	CG	<del>2H</del>	0.50	9	Stand-alone mattress store with surface parking (APN 4170007021, LTI ratio 0.43, built 1947). Self-service car wash with surface parking (APN 4170007022, LTI ratio 0.42, built 1965). Auto repair shop with surface parking (APN 4170007017, LTI ratio 0.19, built 1949). Hair salon and pet salon with surface parking (APN 4170007016, LTI ratio 0.38, built 1949).
7	4167015034		CG	<del>4J</del>	0.65	13	Church building with large surface parking lot (LTI ratio 0.80, built 1966).
8	4170037001 4170037002	<del>7G</del>	CG	<del>4J</del>	0.50	9	Stand-alone commercial with an ice cream shop, spa, and restaurant (APN 4170037001, LTI ratio 0.40, built 1956). Surface parking (APN 4170037002, LTI ratio 0.014).
9	4167026012 4167026011 <del>4167026014</del> <del>4167026015</del> <del>4167026016</del>	<del>8H</del>	CG	<del>4J</del>	<del>1.02</del> <u>0.51</u>	<del>20</del> <u>10</u>	Corner lot with a one-story paint store and large surface parking (APN 4167026012, LTI ratio 0.87, built 1955). Two-story office building with a hair salon, plant services office, advertising office, and limousine services office (APN 4167026011, LTI ratio 0.43, built 1968). <del>Surface parking lot (APN 4167026014, LTI ratio 0.002). One-story stand-alone commercial building with a dentistry and foot specialist office (APN 4167026015, LTI ratio 0.61, built 1944). Auto repair shop with surface parking (APN 4167026016, LTI ratio 0.13, built 1970).</del>
10	4169014048 4169014016	<del>9I</del>	CG	<del>4J</del>	0.62	12	Stand-alone garden center (APN 4169014048, LTI ratio 0.33, built 1974). Garden center store (APN 4169014016, LTI ratio 0.27, built 1954).
11	4167023013 4167023032	<del>10J</del>	CG	<del>4J</del>	0.66	13	Stand-alone cleaners with surface parking (APN 4167023013, LTI ratio 0.05, built 1941). Auto repair shop (APN 4167023032, LTI ratio 0.13, built 1964).
12	4168025011 4168025010 4168025009 4168025008	<del>11K</del>	CG	<del>4J</del>	0.68	13	Pet supply store (APN 4168025011, LTI ratio 0.46, built 1980). Auto repair shop (APN 4168025010, LTI ratio 0.20, built 1953). Large surface parking associated with auto repair shop (APN 4168025009, LTI ratio 0.04). Two-story commercial building with a fraternity office and closed yarn shop (APN 4168025008, LTI ratio 0.75, built 1952).
13	4164003027 4164003022 4164003030	<del>12L</del>	CG	<del>4J</del>	0.66	12	Small commercial strip with pizza shop, liquor store, and laundromat (APN 4164003027, LTI ratio 0.52, built 1984). Small commercial strip with a camera repair shop, tailor, and nail salon (APN 4164003022, LTI ratio 0.39, built 1972). Single-family residence (APN 4164003030, LTI ratio 0.49, built 1957).
14	4164002032 4164002001	<del>13M</del>	CG	<del>4J</del>	0.68	13	Cleaners, smoke shop, and sports bar (APN 4164002032, LTI ratio 0.19, built 1957). One-story commercial building with a banner store, edible arrangements shop, auto parts store, and tutoring service office (APN 4164002001, LTI ratio 0.24, built 1953).
15	4170027001 4170027003 4170027023	<del>14N</del>	CG	<del>4J</del>	0.50	9	Two-story stand-alone building with an insurance agency office and nail salon (APN 4170027001, LTI ratio 1.49, built 1948). Surface parking lot (APN 4170027003, LTI ratio 0.06). Stand-alone restaurant (APN 4170027023, LTI ratio 0.15, built 1992).

**Table 15. Potential Underutilized Sites for Overlay and Rezone**

Table ID	APNs	Consolidated Site <u>Number</u> <u>Letter</u>	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
<del>16</del>	<del>4166007018 4166007014 4166007013 4166007012</del>	<del>15</del>	<del>RM</del>	<del>2E1</del>	<del>0.61</del>	<del>5*</del>	<del>Duplex (APN 4166007018, LTI ratio 0.25, built 1957), Single family residence, detached (APN 4166007014, LTI ratio 0.03, built 1965), Duplex (APN 4166007013, LTI ratio 1.56, built 1973), Duplex (APN 4166007012, LTI ratio 0.71, built 1971), total 7 existing residential units.</del>
<del>17</del>	<del>4166007008 4166007009 4166007010</del>	<del>16</del>	<del>RM</del>	<del>2</del>	<del>0.51</del>	<del>4*</del>	<del>Duplex (APN 4166007008, LTI ratio 0.21, built 1955), Duplex (APN 4166007009, LTI ratio 1.3, built 1946), Duplex (APN 4166007010, LTI ratio 1.7, built 1959), total 6 existing residential.</del>
<del>16</del>	<del>4167026014 4167026015 4167026016</del>	<del>Q</del>	<del>CG</del>	<del>1</del>	<del>0.51</del>	<del>10</del>	<del>Surface parking lot (APN 4167026014, LTI ratio 0.002), One-story stand-alone commercial building with a dentistry and foot specialist office (APN 4167026015, LTI ratio 0.61, built 1944), Auto repair shop with surface parking (APN 4167026016, LTI ratio 0.13, built 1970).</del>
<del>18</del>	<del>4171031021</del>	<del>N/A</del>	<del>RS</del>	<del>2</del>	<del>0.66</del>	<del>13*</del>	<del>Church with surface parking lot (LTI ratio 0.53, built 1956).</del>
<del>19</del> <u>17</u>	4163008046	N/A	CG	<del>4</del> <u>1</u>	0.86	17	Stand-alone office building for an insurance agency with large surface parking lot (LTI ratio 3.37, built 1969).
<del>20</del> <u>18</u>	4165024033	N/A	CG	<del>2E1</del>	0.51	10	Corner lot gas station (LTI ratio 0.12, built 1990).
<del>21</del> <u>19</u>	4166020030	N/A	CG-D8	<del>2E1</del>	0.68	13	Office and commercial building with large surface parking lot, including a sporting goods store, hair salon, and other office spaces (LTI ratio 0.19, built 1961).
<del>22</del> <u>20</u>	4138018022	N/A	PD	<del>2E1</del>	5.14	102	Five story stand-alone office building with a large surface parking lot (LTI ratio 3.31, built 1982).
<del>23</del> <u>21</u>	4166019026	N/A	CG-D8	<del>2E1</del>	0.67	13	Car wash service (LTI ratio 0.51, built 1972).
<del>24</del> <u>22</u>	4173032034	N/A	CG	<del>2E1</del>	0.68	13	Commercial lot with two stand-alone buildings. One building has multiple tenants, including a pizza franchise, massage spa, sushi restaurant, bakery, and jewelry store. The second building is a vacated office space. There is a large surface parking lot (LTI ratio 0.57, built 1983).
<del>25</del>	<del>4166020030</del>	N/A	CG-D8	<del>2E1</del>	0.68	13	Two-story office building with a computer services office, therapy, chiropractor, and management office (LTI ratio 0.19, built 1961).
<del>23</del> <u>6</u>	4166020034	N/A	CG-D8	<del>2E1</del>	2.93	58	Commercial center with a bicycle store, bagel stop, restaurant, sports apparel store, market, bank, and theatre company and large surface parking lot (LTI ratio 0.62, built 1955).
<del>24</del> <u>7</u>	4171013043	N/A	CG	<del>2E1</del>	0.71	14	Small commercial strip and surface parking lot with a bank, lighting store, fitness store, and nail shop (LTI ratio 1.57, built 1980).
<del>25</del> <u>8</u>	4170037023	N/A	CG-D8	<del>1</del> <u>4</u>	0.5	10	Commercial retail building with a dry cleaners, Pilates studio, salon, hair studio, florist, restaurant, and personal fitness training gym (LTI ratio 0.54, built 1969).
<del>29</del> <u>26</u>	4167028036	N/A	CG-D8	<del>4</del> <u>1</u>	0.86	17	Small commercial building with a café and two restaurants with a large surface parking lot (LTI ratio 0.42, built 1960).

**Table 15. Potential Underutilized Sites for Overlay ~~and~~ Rezone**

Table ID	APNs	Consolidated Site <u>Number</u> <u>Letter</u>	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Existing Uses
<del>3027</del>	4168013014	N/A	CG-D8	<del>41</del>	1.5	29	Commercial building with a dental office, pizza restaurant, insurance office, driving school, and a large surface parking lot (LTI ratio 0.57, built 1976).
<del>3128</del>	4168012034	N/A	CG	<del>41</del>	0.83	16	Stand-alone commercial building with a large surface parking lot with an eating establishment, donation center, and sandwich shop. There is redevelopment interest on this site (LTI ratio 1.63, built 1961).
<del>3229</del>	4168012029	N/A	CG	<del>41</del>	0.89	17	Stand-alone bank with surface parking. There is redevelopment interest on this site. (LTI ratio 0.71, built 1964).
<del>3330</del>	4168012036	N/A	CG	<del>41</del>	2.67	53	Shopping center with redevelopment interest. Composed of three stand-alone buildings with multiple tenants and large surface parking lot. Tenants include a fitness center, cleaners, tanning salon, spa, print and ship center, nutrition store, fast-food restaurant, and vacant tenant spaces (LTI ratio 0.76, built 1960).
<del>3431</del>	4138018045	N/A	PD	<del>211</del>	4.79	95	Stand-alone five-story commercial building with a gym, coworking offices, and a parking garage (LTI ratio 1.93, built 1982).
<del>3532</del>	4138018908	N/A	PD	<del>211</del>	7.47	149	Country club with surface parking and multiple tennis courts (LTI ratio N/A, City owned).
<del>3633</del>	4138026900	N/A	PD	<del>211</del>	5.4	108	Large surface parking lot and recreation field (LTI ratio N/A, City owned).
<del>3734</del>	4138020056	N/A	CG-D8	<del>211</del>	3.29	65	Large, vacated stand-alone building with developer interest (LTI ratio 1.49, built 1978).
Total	-	-	-	-	<del>54.36</del> <u>50.9</u>	<del>1,031</del> <u>1,018</u>	

APN = Assessor's Parcel Number; du/acre = dwelling units per acre; LTI = land-to-improvement; N/A = not applicable

\*TEXT

To ensure there is an adequate buffer for lower-income sites, the City has identified 1.78 acres to rezone, which approximately accommodates 22 net new units as a buffer, and the City will select additional sites from the extra capacity identified in **Table 15, Potential Underutilized Sites for Overlay and Rezone**. As recommended by HCD and to comply with the provisions of Senate Bill 166 (2017) (see **Program 16**), the buffer is approximately 15 percent (approximately 73 units) of the total 487 lower-income RHNA. The sites selected to for the buffer to ensure lower-income capacity buffer are not subject to the requirements under **Program 2**. The buffer will ensure sufficient capacity exists to accommodate the RHNA throughout the planning period.

**Table 15, Potential Underutilized Sites for Overlay and Rezone**, lists the underutilized sites in the CG zone, and PD zones, and sites the City will rezone (marked with an Asterix symbol in the Lower-Income Units column). Table 15 also indicates the total realistic capacity each site could accommodate for lower-income units at 20 du per acre. Although not all the sites may be selected as part of the overlay, the City has identified 54.36 acres that could potentially accommodate 1,031 lower-income units, more than half the 20.1 acres required to accommodate the shortfall of 402 lower-income units. **Figure 4, Sites to Accommodate Lower-Income Shortfall and Buffer**, shows sites selected as additional capacity for the City to accommodate the remaining RHNA need for lower-income units, including a buffer to ensure sufficient capacity throughout the planning period.

## 7.2 Sites to Accommodate Lower-Income Buffer

As previously mentioned, in addition to establishing an overlay in the CG and PD zones to accommodate the shortfall of 406 lower-income units, the City will rezone approximately 3.65 acres to ensure there is an adequate buffer. As recommended by HCD and to comply with the provisions of Senate Bill 166 (2017) (see **Program 19, No Net Loss**), the buffer is approximately 15 percent (approximately 73 units) of the total 487 lower-income RHNA. The buffer will ensure sufficient capacity exists to accommodate the RHNA throughout the planning period. **Table 16, Rezone Sites for Lower-Income Buffer**, lists sites identified as underutilized using the methodology and on-the-ground analysis described in the previous section (see **Section 7.1.1, Non-vacant Sites Selection Methodology** through **7.1.5, Availability of Regulatory and/or other Incentives** for details) for identifying potential capacity in the City. The City identified 5 sites, a total of 26 net new units, as it accounts for existing residential uses, in the RS and RM zones which will be rezoned to RH which meets the default density of 30 du per acre dwelling units per acre required for lower-income sites. The realistic capacity is for lower-income units is again calculated at 20 du per acre dwelling units per acre. Table ID 35 through 37 are consolidated sites and include multiple parcels. As noted in previous sections, the City is facilitating lot consolidation through Program 16. Additionally, although most sites may include parcels with different ownership, planned development projects indicate that this has not prevented or created an impediment to the development of housing, and housing affordable to lower-income households.

Sites identified as Table ID 38 and 39, below, are identified as having potential and property owner interest to accommodate lower-income housing in exchange for parking reductions pursuant to the provisions of Assembly Bill (AB) 1851. The units calculated on Table ID 38 and 39 account for the requirements under AB 1851 which only allow up to 50 percent of the number of religious-use parking

spaces requested to be eliminated. For example, the church site represented as Table ID 40, is located on a 1.63-acre lot and has a 0.51-acre surface parking lot. As AB 1851 only permits up to 50 percent of parking removal, the units were calculated at 20 ~~du per acre~~dwelling units per acre on 0.30 acres. Through **Program 22, Parking Reductions in Exchange for Housing at Religious Institutions**, the City will amend the Zoning Code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development. The remaining need for 47 lower-income buffer units or 2.35 acres of land will be identified from the list of sites in Table 15; however, these sites will not be subject to the program requirements under Program 2 as is required for the shortfall of sites. **Figure 4, Sites to Accommodate Lower-Income Shortfall and Buffer**, shows sites selected as additional capacity for the City to accommodate the remaining RHNA need for lower-income units, including a buffer to ensure sufficient capacity throughout the planning period.

**Table 16. Rezone Sites to Accommodate the Buffer**

Table ID	APNs	Consolidated Site Letter Number	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du per acre dwelling units per acre)	Existing Uses
<u>35</u>	<u>4166007018</u> <u>4166007014</u> <u>4166007013</u> <u>4166007012</u>	<u>P</u>	<u>RM</u>	<u>II</u>	<u>0.61</u>	<u>5</u>	<u>Duplex (APN 4166007018, LTI ratio 0.25, built 1957), Single-family residence, detached (APN 4166007014, LTI ratio 0.03, built 1965), Duplex (APN 4166007013, LTI ratio 1.56, built 1973), Duplex (APN 4166007012, LTI ratio 0.71, built 1971), total 7 existing residential units.</u>
<u>36</u>	<u>4166007008</u> <u>4166007009</u> <u>4166007010</u>	<u>Q</u>	<u>RM</u>	<u>II</u>	<u>0.51</u>	<u>4</u>	<u>Duplex (APN 4166007008, LTI ratio 0.21, built 1955), Duplex (APN 4166007009, LTI ratio 1.3, built 1946), Duplex (APN 4166007010, LTI ratio 1.7, built 1959), total 6 existing residential.</u>
<u>37</u>	<u>4169024004</u> <u>4169024005</u>	<u>R</u>	<u>RM</u>	<u>I</u>	<u>0.55</u>	<u>8</u>	<u>Single-family residence, detached (APN 4169024004, LTI ratio 0.25, built 1934); single-family residence, detached (APN 4169024005, LTI ratio 0.01, built 1937).</u>
<u>38</u>	<u>4171031021</u>	<u>N/A</u>	<u>RS</u>	<u>II</u>	<u>0.66</u>	<u>4*</u>	<u>Church with an approximate 0.44-acre surface parking lot (LTI ratio 0.53, built 1956).</u>
<u>39</u>	<u>4167013020</u>	<u>N/A</u>	<u>RS</u>	<u>I</u>	<u>1.63</u>	<u>5*</u>	<u>Church with an approximate 0.51-acre surface parking lot (LTI ratio 1.74, built in 1963).</u>
<u>Total</u>		<u>-</u>	<u>-</u>	<u>-</u>	<u>3.96</u>	<u>26</u>	<u>-</u>
<u>*Note: Calculated at 50% of the parking lot acreage indicated in the Existing Uses column</u>							

### Sites to Accomodate Lower-Income Shortfall and Buffer



Figure 4. Sites to Accommodate Lower-Income Shortfall and Buffer

## 8 Conclusions

Bound by Rosecrans Avenue to the north, the Pacific Ocean to the west, Redondo Beach and Hermosa Beach to the east and south, the City has developed to the edges of its boundaries. Because the City is nearly entirely built-out and does not have large swaths of land preserved for open space or conservation, there are little to no opportunities to identify new housing capacity on undeveloped lands. The City's housing capacity is identified in the form of underutilized sites that are most suitable for redevelopment. The underutilization of these sites, in combination with their location in high-resource areas and paired with the following programs of the Housing Element, will ensure that the City can realistically meet the RHNA targets at all income levels during the Housing Element planning period:

- Through Program 1, Accessory Dwelling Units, the City will stay current and amend the ADU Ordinance if needed to conform to future amendments to State law, and develop public engagement and informational tools to streamline the approval process and market ADU/JADU construction, including ADUs affordable to lower- and moderate-income households, to achieve an annual average goal of 10 building permits issued for ADUs.
- Through Program 2, Adequate Sites, the City will establish a new overlay district to create the opportunity for several hundred residential units on land that historically only allowed purely commercial uses. As reflected in the previous section, each site identified as a potential site for the Adequate Sites Program's overlay has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.
- Through Program 3, Affordable Housing Streamlining, the City will continue to offer concurrent processing of all discretionary applications for a project and inform developers of the opportunity for concurrent processing. To minimize constraints to the development of affordable housing that may result from discretionary permitting procedures, the City will amend the Zoning Code to ensure Precise Development Plan applications are subject only to an administrative non-discretionary approval process.
- Through Program 7, By-Right Development, the City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified in the Sites Inventory to accommodate the lower-income RHNA that were previously identified in past Housing Elements.
- Through Program 12, Developer Outreach, the City will actively work with the development community to identify ways that lower-income housing may be provided, including housing for extremely low-income households and those with special housing needs. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households. Another outreach effort will inform the development community and property owners about development opportunities for ADUs.
- Through Program 16, Lot Consolidation Incentive, the City will continue to provide an additional density bonus incentive which goes above and beyond what is permitted under State Law. The program will also be amended to provide lot consolidation bonus incentives for sites identified in the Sites Inventory to support the consolidation of small sites 0.3 acres or greater.



- Through Program 19, No Net Loss, the City will use its development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under State law.
- Through Program 22, Parking Reduction in Exchange for Housing at Religious Institution, the City will make Zoning Code revisions to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.
- Through Program 30, Surplus Lands, the City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Report in accordance with the requirements of State law.

Further details on these programs can be found in the Programs section of the Housing Element. HCD's Sites Inventory Form is provided as Exhibit A, below.

# EXHIBIT A

Table B: Housing Site Characteristics and Potential to Address Moderate Shortfall Housing Need, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information 1	Optional Information 2	Optional Information 3
MANHATTAN BEACH	3714 HIGHLAND AVE	90266	4137001906	A	North End Commercial (CNE)	CNE, Area District III	0	51.2	0.03	City owned parking	YES - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	6			6		LTI ratio 0.00	N/A
MANHATTAN BEACH	see above	90266	4137001905	A	CNE	CNE, Area District III	0	51.2	0.05	City owned parking	YES - Current	YES - City-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.00	N/A
MANHATTAN BEACH	see above	90266	4137001904	A	CNE	CNE, Area District III	0	51.2	0.16	City owned parking	YES - Current	YES - City-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.00	N/A
MANHATTAN BEACH	see above	90266	4137001900	A	CNE	CNE, Area District III	0	51.2	0.03	City owned parking	YES - Current	YES - City-Owned	Available	Used in Prior Housing Element - Non-Vacant					see capacity above	LTI ratio 0.00	N/A
MANHATTAN BEACH	1030 MANHATTAN BEACH BLV	90266	4170026003	B	(Local Commercial) CL	CL, Area District I	0	46.6	0.36	Remax Offices, stand	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	9			9		LTI ratio 0.30	Built 1953
MANHATTAN BEACH	1026 MANHATTAN BEACH BLV	90266	4170026004	B	CL	CL, Area District I	0	46.6	0.13	Two-story stand-alk	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				see capacity above	LTI ratio 0.95		Built 1964
MANHATTAN BEACH	1535 ARTESIA BLVD	90266	4163024028		High Density Residential (RH)	RH, Area District I	0	46.6	0.46	Masonic Center wil	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	9			9		LTI ratio 0.97	Built 1963
MANHATTAN BEACH	1756 MANHATTAN BEACH BLV	90266	4164016002	C	CL	CL, Area District I	0	43.6	0.11	Stand alone buildin	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		11		11		LTI ratio 0.70	Built 1952
MANHATTAN BEACH	1750 MANHATTAN BEACH BLV	90266	4164016003	C	CL	CL, Area District I	0	43.6	0.11	Stand alone buildin	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.27	Built 1952
MANHATTAN BEACH	1762 MANHATTAN BEACH BLV	90266	4164016001	C	CL	CL, Area District I	0	43.6	0.11	Stand-alone real es	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.21	Built 1952
MANHATTAN BEACH	1716 MANHATTAN BEACH BLV	90266	4164016010		CL	CL, Area District I	0	43.6	0.11	Stand-alone real es	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.11	Built 1955
MANHATTAN BEACH	939 MANHATTAN BEACH BLV	90266	4170010014		CL	CL, Area District II	0	43.6	0.09	Two-story beauty s	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.20	Built 1958
MANHATTAN BEACH	917 MANHATTAN BEACH BLV	90266	4170011014	D	CL	CL, Area District II	0	43.6	0.09	Dentistry with surf	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.70	Built 1964
MANHATTAN BEACH	921 MANHATTAN BEACH BLV	90266	4170011015	D	CL	CL, Area District II	0	43.6	0.1	Law office with surf	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.51	Built 1962
MANHATTAN BEACH	901 MANHATTAN BEACH BLV	90266	4170011010	E	CL	CL, Area District II	0	43.6	0.1	Stand-alone tax att	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		10		10		LTI ratio 0.65	Built 1963
MANHATTAN BEACH	909 MANHATTAN BEACH BLV	90266	4170011012	E	CL	CL, Area District II	0	43.6	0.09	Two-story real esta	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.00	Built 1958
MANHATTAN BEACH	905 MANHATTAN BEACH BLV	90266	4170011011	E	CL	CL, Area District II	0	43.6	0.09	Vacated stand alone	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.42	Built 1948
MANHATTAN BEACH	828 MANHATTAN BEACH BLV	90266	4170023007		CL	CL, Area District I	0	43.6	0.17	Stand-alone dermal	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			7	7		LTI ratio 0.43	Built 1971
MANHATTAN BEACH	1633 ARTESIA BLVD	90266	4163009020		HDR	RH, Area District I	0	43.6	0.3	Single Family Resid	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			9	9		LTI ratio 0.15	Built 1950
MANHATTAN BEACH	910 MANHATTAN BEACH BLV	90266	4170025010	F	CL	CL, Area District I	0	43.6	0.12	Single family reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			9	9		LTI ratio 0.13	Built 1941
MANHATTAN BEACH	920 MANHATTAN BEACH BLV	90266	4170025008	F	CL	CL, Area District I	0	43.6	0.12	Two-story real esta	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.93	Built 1978
MANHATTAN BEACH	916 MANHATTAN BEACH BLV	90266	4170025009	F	CD	CD, Area District I	0	43.6	0.12	Triplex with 3 exist	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.25	Built 1949
MANHATTAN BEACH	1216 HIGHLAND AVE	90266	4179004001		(Downtown Commercial) CD	CD, Area District III	0	51.2	0.15	Stand-alone two-st	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.35	Built 1946
MANHATTAN BEACH	212 MANHATTAN BEACH BLV	90266	4179020012	G	CD	CD, Area District III	0	51.2	0.03	Retail clothing stor	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.28	Built 1947
MANHATTAN BEACH	1120 MANHATTAN AVE	90266	4179020001	G	CD	CD, Area District III	0	51.2	0.03	Ice cream shop	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.40	Built 1940
MANHATTAN BEACH	208 MANHATTAN BEACH BLV	90266	4179020013	G	CL	CD, Area District III	0	51.2	0.03	Stand-alone gift sh	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.10	Built 1923
MANHATTAN BEACH	1419 HIGHLAND AVE	90266	4179028001		CL	CD, Area District III	0	51.2	0.08	Real estate agency	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.29	Built 1956
MANHATTAN BEACH	3515 HIGHLAND AVE	90266	4175024023		CNE	CNE-D5/RH, Area Distr	0	51.2	0.09	Stand-alone hair sa	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.98	Built 1965
MANHATTAN BEACH	4005 HIGHLAND AVE	90266	4137009058		CNE	CNE, Area District III	0	51.2	0.13	Stand-alone vacate	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			5	5		LTI ratio 0.79	Built 1970
MANHATTAN BEACH	953 MANHATTAN BEACH BLV	90266	4170009800		CL	CL, Area District II	0	43.6	0.59	Telecommunication	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			20	20		LTI ratio 0.00	N/A
MANHATTAN BEACH	1426 12TH ST	90266	4166009008		HDR	RH, Area District II	0	43.6	0.24	Duplex, 2	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.31	Built 1942
MANHATTAN BEACH	1324 12TH ST	90266	4166010006		HDR	RH, Area District II	0	43.6	0.16	SFR, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.27	Built 1953
MANHATTAN BEACH	1314 12TH ST	90266	4166010008		HDR	RH, Area District II	0	43.6	0.16	SFR, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.33	Built 1956
MANHATTAN BEACH	852 MANHATTAN BEACH BLV	90266	4170024008	H	CL	CL, Area District I	0	43.6	0.09	Mixed-use lot with	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			5	5		LTI ratio 0.24	Built 1952
MANHATTAN BEACH	848 MANHATTAN BEACH BLV	90266	4170024009	H	CL	CL, Area District I	0	43.6	0.09	Stand-alone vacate	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.42	Built 1959
MANHATTAN BEACH	1141 N POINSETTIA AVE	90266	4170014009	I	CL	CL, Area District II	0	43.6	0.05	SFR, detached, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.10	Built 1940
MANHATTAN BEACH	1145 N POINSETTIA AVE	90266	4170014008	I	Medium Density Residential	CL, Area District II	0	43.6	0.11	SFR, detached, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.27	Built 1928
MANHATTAN BEACH	1451 12TH ST.	90266	4166008016		RH	RH, Area District II	0	43.6	0.17	Duplex, 2	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			4	4		LTI ratio 0.60	Built 1954
MANHATTAN BEACH	1011 MANHATTAN BEACH BLV	90266	4170008027	J	CL	CL, Area District II	0	43.6	0.19	design studio office	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			13	13		LTI ratio 0.14	Built 1963
MANHATTAN BEACH	1019 MANHATTAN BEACH BLV	90266	4170008028	J	CNE	CL, Area District II	0	43.6	0.2	restaurant with larg	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.44	Built 1952
MANHATTAN BEACH	3520 HIGHLAND AVE	90266	4175017007	K	CNE	CNE-D5, Area District II	0	51.2	0.04	Stand-alone two-st	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.81	Built 1965
MANHATTAN BEACH	3514 HIGHLAND AVE	90266	4175017009	K	CNE	CNE-D5, Area District II	0	51.2	0.04	Commercial buildin	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.88	Built 1936
MANHATTAN BEACH	3608 HIGHLAND AVE	90266	4175016022	L	CNE	CNE, Area District III	0	51.2	0.04	Restaurant/Pub	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			6	6		LTI ratio 0.48	Built 1948
MANHATTAN BEACH	312 ROSECRANS AVE	90266	4175016027	L	CNE	CNE, Area District III	0	51.2	0.16	El Porto Building, cl	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.30	Built 1953
MANHATTAN BEACH	3614 HIGHLAND AVE	90266	4175016015	L	CNE	CNE, Area District III	0	51.2	0.04	Real estate and esc	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element					see capacity above	LTI ratio 0.31	Built 1939
MANHATTAN BEACH	1711 ARTESIA BLVD	90266	4163008038		CL	CL, Area District I	0	43.6	0.3	Graphic design offic	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			10	10		LTI ratio 0.39	Built 1959
MANHATTAN BEACH	315 12TH ST	90266	4179004005		CD	CD, Area District III	0	51.2	0.06	Surface parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2		LTI ratio 0.01	Built 1965
MANHATTAN BEACH	1213 MANHATTAN AVE	90266	4179022029		CD	CD, Area District III	0	51.2	0.03	Stand-alone dentis	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			1	1		LTI ratio 0.52	Built 1924
MANHATTAN BEACH	1409 HIGHLAND AVE	90266	4179028025		CD	CD, Area District III	0	51.2	0.07	Stand-alone real es	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3	3		LTI ratio 0.27	Built 1989
MANHATTAN BEACH	3917 HIGHLAND AVE	90266	4137010006		CNE	CNE, Area District III	0	51.2	0.04	Surface parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			1	1		LTI ratio 0.02	Built 1957
MANHATTAN BEACH	MOONSTONE ST/HIGHLAND AVE	90266	4137008057		CNE	CNE, Area District IV	0	51.2	0.06	Surface parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2		LTI ratio 0.01	Built 1966
MANHATTAN BEACH	316 ROSECRANS AVE	90266	4175016005		CNE	CNE, Area District III	0	51.2	0.06	Stand-alone restaur	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2		LTI ratio 0.08	Built 1939
MANHATTAN BEACH	HIGHLAND AVE/38TH PL	90266	4137002016		CNE	CNE, Area District IV	0	51.2	0.04	Empty parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			1	1		LTI ratio 0.00	N/A
MANHATTAN BEACH	EL PORTO ST/OCEAN DR	90266	4137010022		HDR	RH, Area District IV	0	51.2	0.03	Empty parking lot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			1	1		LTI ratio 0.00	N/A
MANHATTAN BEACH	815 MANHATTAN AVE	90266	4179014013		CD	CD, Area District III	0	51.2	0.06	Office building, clot	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2		LTI ratio 0.26	Built 1972
MANHATTAN BEACH	1407 12TH ST	90266	4166008007		RH	RH, Area District II	0	43.6	0.12	SFR, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			3				

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Optional Information1	Optional Information2	Optional Information3
MANHATTAN	503 N SEPULVEDA BLVD	90266	4169006006	Capacity captu	10			Shortfall of Sites	0.15	CG	CG	See Program 2	See Program 2	20	TBD during Overl	10	Non-Vacant	Two -Story offic	A	LTI ratio 0.37	Built 1977
MANHATTAN	407 N SEPULVEDA BLVD	90266	4169006005	Capacity captu	0			Shortfall of Sites	0.23	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Small commer	A	LTI ratio 0.14	Built 1954
MANHATTAN	509 N SEPULVEDA BLVD	90266	4169006007	Capacity captu	0			Shortfall of Sites	0.15	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	State Farm res	A	LTI ratio 0.67	Built 1987
MANHATTAN	2909 N SEPULVEDA BLVD	90266	4173027026	Capacity captu	23			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	23	Non-Vacant	Smog check st	B	LTI ratio 1.06	Built 1989
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173027020	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Surface parkin	B	LTI ratio 0.06	Built 1969
MANHATTAN	2905 N SEPULVEDA BLVD	90266	4173027022	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Picture frame	B	LTI ratio 0.00	Built 1947
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173027019	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Medical offices	B	LTI ratio 3.09	Built 1946
MANHATTAN	2701 N SEPULVEDA BLVD	90266	4173027024	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Standalone bu	B	LTI ratio 0.42	Built 1948
MANHATTAN	2705 N SEPULVEDA BLVD	90266	4173027027	Capacity captu	0			Shortfall of Sites	0.39	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Standalone bu	B	LTI ratio 0.22	Built 1974
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173027021	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	surface parkin	B	LTI ratio 0.06	Built 1969
MANHATTAN	2401 N SEPULVEDA BLVD	90266	4171013041	Capacity captu	29			Shortfall of Sites	0.41	MU	CG/RS-D6	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Coreolgy Plate	C	LTI ratio 0.51	Built 1961
MANHATTAN	2405 N SEPULVEDA BLVD	90266	4171013036	Capacity captu	0			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	One-story buil	C	LTI ratio 0.99	Built 1954
MANHATTAN	2301 N SEPULVEDA BLVD	90266	4171013030	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Vacated Enter	C	LTI ratio 0.34	Built 1957
MANHATTAN	2317 N SEPULVEDA BLVD	90266	4171013034	Capacity captu	0			Shortfall of Sites	0.05	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Printing office	C	LTI ratio 0.22	Built 1947
MANHATTAN	2301 N SEPULVEDA BLVD	90266	4171013029	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Parking Lot for	C	LTI ratio 0.00	N/A
MANHATTAN	2309 N SEPULVEDA BLVD	90266	4171013039	Capacity captu	0			Shortfall of Sites	0.2	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Real estate gr	C	LTI ratio 0.54	Built 1957
MANHATTAN	1701 N SEPULVEDA BLVD	90266	4171014034	Capacity captu	13			Shortfall of Sites	0.24	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Auto repair and	D	LTI ratio 0.66	Built 1968
MANHATTAN	1721 N SEPULVEDA BLVD	90266	4171014020	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Two-story buil	D	LTI ratio 0.33	Built 1923
MANHATTAN	1725 N SEPULVEDA BLVD	90266	4171014021	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	surface parkin	D	LTI ratio 0.00	Built 1950
MANHATTAN	1717 N SEPULVEDA BLVD	90266	4171014035	Capacity captu	0			Shortfall of Sites	0.24	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto service a	D	LTI ratio 0.31	Built 1972
MANHATTAN	1505 N SEPULVEDA BLVD	90266	4170006017	Capacity captu	21			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	21	Non-Vacant	Duplex with 2	E	LTI ratio 0.22	Built 1949
MANHATTAN	1509 N SEPULVEDA BLVD	90266	4170006018	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone m	E	LTI ratio 0.06	Built 1950
MANHATTAN	1413 N SEPULVEDA BLVD	90266	4170006015	Capacity captu	0			Shortfall of Sites	0.28	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone co	E	LTI ratio 0.26	Built 1955
MANHATTAN	1501 N SEPULVEDA BLVD	90266	4170006022	Capacity captu	0			Shortfall of Sites	0	MU	CG/RS-D6	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Two-story com	E	LTI ratio 0.39	Built 1964
MANHATTAN	1405 N Sepulveda Blvd	90266	4170006028	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Ingress and eg	E	LTI ratio 0.00	N/A
MANHATTAN	1401 N SEPULVEDA BLVD	90266	4170006013	Capacity captu	0			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Veterinarian of	E	LTI ratio 0.34	Built 1948
MANHATTAN	1405 N Sepulveda Blvd	90266	4170006027	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto service sh	E	LTI ratio 0.00	N/A
MANHATTAN	1601 N SEPULVEDA BLVD	90266	4170006019	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone sh	E	LTI ratio 0.27	Built 1965
MANHATTAN	1213 N SEPULVEDA BLVD	90266	4170007016	Capacity captu	9			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	9	Non-Vacant	Hair salon and	F	LTI ratio 0.38	Built 1949
MANHATTAN	1309 N SEPULVEDA BLVD	90266	4170007022	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Self-service ca	F	LTI ratio 0.42	Built 1965
MANHATTAN	1301 N SEPULVEDA BLVD	90266	4170007017	Capacity captu	0			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sh	F	LTI ratio 0.19	Built 1949
MANHATTAN	1315 N SEPULVEDA BLVD	90266	4170007021	Capacity captu	0			Shortfall of Sites	0.1	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone m	F	LTI ratio 0.43	Built 1947
MANHATTAN	917 N SEPULVEDA BLVD	90266	4170037001	Capacity captu	9			Shortfall of Sites	0.32	CG	CG	See Program 2	See Program 2	20	TBD during Overl	9	Non-Vacant	Stand-alone co	G	LTI ratio 0.40	Built 1956
MANHATTAN	1048 10TH ST	90266	4170037002	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Surface parkin	G	LTI ratio 0.01	N/A
MANHATTAN	708 N SEPULVEDA BLVD	90266	4167026012	Capacity captu	10			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	10	Non-Vacant	Corner lot with	H	LTI ratio 0.87	Built 1955
MANHATTAN	1116 8TH ST	90266	4167026011	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Two-story offic	H	LTI ratio 0.43	Built 1968
MANHATTAN	201 N SEPULVEDA BLVD	90266	4169014016	Capacity captu	12			Shortfall of Sites	0.09	CG	CG	See Program 2	See Program 2	20	TBD during Overl	12	Non-Vacant	Garden center	I	LTI ratio 0.27	Built 1954
MANHATTAN	207 N SEPULVEDA BLVD	90266	4169014048	Capacity captu	0			Shortfall of Sites	0.53	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone ga	I	LTI ratio 0.33	Built 1974
MANHATTAN	200 N SEPULVEDA BLVD	90266	4167023013	Capacity captu	13			Shortfall of Sites	0.28	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Stand-alone co	J	LTI ratio 0.05	Built 1941
MANHATTAN	222 N SEPULVEDA BLVD	90266	4167023032	Capacity captu	0			Shortfall of Sites	0.37	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sh	J	LTI ratio 0.13	Built 1964
MANHATTAN	224 S SEPULVEDA BLVD	90266	4168025008	Capacity captu	13			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Two-story com	K	LTI ratio 0.75	Built 1952
MANHATTAN	204 S SEPULVEDA BLVD	90266	4168025011	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Pet supply stor	K	LTI ratio 0.46	Built 1980
MANHATTAN	208 S SEPULVEDA BLVD	90266	4168025010	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sh	K	LTI ratio 0.20	Built 1953
MANHATTAN	210 Sepulveda Blvd	90266	4168025009	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Large surface	K	LTI ratio 0.04	N/A
MANHATTAN	975 N AVIATION BLVD	90266	4164003027	Capacity captu	12			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	12	Non-Vacant	Small commer	L	LTI ratio 0.52	Built 1984
MANHATTAN	909 N AVIATION BLVD	90266	4164003022	Capacity captu	0			Shortfall of Sites	0.16	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Small commer	L	LTI ratio 0.39	Built 1972
MANHATTAN	1853 9TH ST	90266	4164003030	Capacity captu	0			Shortfall of Sites	0.15	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Single Family	L	LTI ratio 0.50	Built 1952
MANHATTAN	1853 10TH ST	90266	4164002032	Capacity captu	13			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	13	Non-Vacant	Cleaners, Smd	M	LTI ratio 0.20	Built 1957
MANHATTAN	1075 N AVIATION BLVD	90266	4164002001	Capacity captu	0			Shortfall of Sites	0.34	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	One-story com	M	LTI ratio 0.25	Built 1953
MANHATTAN	1021 N SEPULVEDA BLVD	90266	4170027001	Capacity captu	9			Shortfall of Sites	0.13	CG	CG	See Program 2	See Program 2	20	TBD during Overl	9	Non-Vacant	Two-story stan	N	LTI ratio 1.49	Built 1948
MANHATTAN	1048 11TH ST	90266	4170027003	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Surface parkin	N	LTI ratio 0.05	N/A
MANHATTAN	1015 N SEPULVEDA BLVD	90266	4170027023	Capacity captu	0			Shortfall of Sites	0.19	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Stand-alone re	N	LTI ratio 0.15	Built 1992
MANHATTAN	600 N SEPULVEDA BLVD	90266	4167026014	Capacity captu	10			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	10	Non-Vacant	Surface parkin	O	LTI ratio 0.00	N/A
MANHATTAN	1117 6TH ST	90266	4167026016	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	Auto repair sh	O	LTI ratio 0.14	Built 1970
MANHATTAN	1111 6TH ST	90266	4167026015	Capacity captu	0			Shortfall of Sites	0.17	CG	CG	See Program 2	See Program 2	20	TBD during Overl	see above	Non-Vacant	One-story stan	O	LTI ratio 0.61	Built 1944
MANHATTAN	1416 17TH ST MANHATTAN BEACH	90266	4166007013	Capacity captu	5			Buffer	0.16	MDR	RM	See Program 2	See Program 2	0	TBD during Overl	5	Non-Vacant	Duplex, 2 - Bu	P	LTI ratio 1.56	Built 1973
MANHATTAN	1410 17TH ST MANHATTAN BE																				

# Appendix F: Community Engagement Summary

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## 1. Introduction

The City of Manhattan Beach (City) conducted a robust public outreach program that engaged a broad spectrum of the community and stakeholders. Engagement related to the Housing Element update has attempted to be comprehensive while in the context of the COVID-19 pandemic. Stay-at-home orders of 2020 and 2021 provided the City with opportunities to explore new avenues for public engagement and increased access for those who are traditionally not involved in the planning process. Outreach and formal engagement activities were held virtually across a variety of platforms. Community engagement and outreach was solely done in English. While this is assumed to not be a linguistic barrier to participation for the City's population (98 percent of the population per 2019 Census data comes from an English-only-speaking household or speak English "very well"), the City is aware of local and regional demographic changes and will continue to monitor the need for any linguistic services in future outreach endeavors. Feedback collected throughout the public outreach program was used to inform the goals, policies, and programs of the Housing Element and ensure that the City maintains the quality of life residents and visitors enjoy while planning for future housing needs.

All public meetings were promoted via the City's three social media platforms (Facebook, Twitter, and Instagram), the City's website, [which has translation services available](#), printed and emailed mailers, [including a comprehensive stakeholder list](#), and newspaper ads. Meetings were noticed at least 9 days prior to the event. Social media content for each meeting was, on average, displayed over 21,000 instances, reaching more than 11,200 individuals. By promoting the outreach events via digital and print methods, the City was able to reach a large portion of the population, including low-income residents, renters, and other groups often left out of the formal planning process. The following outreach activities were conducted to engage stakeholders and inform development of the Housing Element.

## 2. City Council Meetings

### 2.1 City Council Meeting 1

The first presentation to the City Council occurred on August 24, 2021. [The meeting was promoted via the City's three social media platforms \(Facebook, Twitter, and Instagram\), the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which includes the Chamber of Commerce, seniors club, Homeowners Association \(HOA\), local organizations which represent various groups including lower-income groups, and individuals to ensure all income groups are represented in the data and throughout the development of the Housing Element.](#)

Council members were presented an introduction to the Housing Element update process; background data, including income category levels; and a brief discussion on the City's Regional Housing Needs Allocation of 774 units. The Mayor and Council Members responded to the presentation and offered their perspectives.

City staff received feedback from City Council noting the lack of vacant land in the City, which presents a challenge to opportunities for new housing development. Other feedback included the need for density bonus programs to incentivize the production of affordable housing by private developers. City staff provided additional detail on the City's existing, streamlined development process in certain zones, which

will be carried over to the updated Housing Element. A recording of the City Council meeting is available on the City's website.

## 2.2 City Council Meeting 2

The second presentation to City Council occurred on September 21, 2021, at 6:00 p.m. Again, the meeting was promoted via the City's social media platforms, the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which as previously mentioned includes the Chamber of Commerce, seniors group, individuals, and organizations which represent lower-income groups and people experiencing homelessness, to ensure all income groups are represented in the data and throughout the development of the Housing Element. Staff presented an overview of the Housing Elements process; progress completed to date, including the Review of 5th Cycle Housing Element, Needs Assessment, and Affirmatively Furthering Fair Housing Analysis; and an overview of existing conditions in Manhattan Beach as it pertains to the Housing Element update process. Staff also presented on State regulatory mandates, including Senate Bill 35, Assembly Bill 101, and Assembly Bill 671, and policy development. Staff also provided an overview of the Sites Analysis and Inventory process.

City Council asked for clarification on the how building year is used to identify redevelopment opportunities, asked about accessory dwelling unit regulations, and commented on the potential for duplexes in areas zoned for single-family homes. A recording of the City Council meeting is available on the City's website.

## 3. Stakeholder Workshop

A stakeholder workshop occurred on August 31, 2021, and allowed interested parties to be engaged in a more formal setting where they learned about the Housing Element background and purpose, existing conditions and data, the project process and scope, and the next steps. Similar to noticing for previous meetings, the workshop was promoted via the City's social media platforms, the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which includes organizations representing lower-income groups and people experiencing homelessness, to ensure all income groups are represented in the data and throughout the development of the Housing Element. The workshop was held during a weekday evening, outside of traditional working hours, and streamed live via Zoom to facilitate participation from local non-profits, community leaders, and the public. This workshop was also available via a call-in number to ensure persons without internet access could join. promoted on multiple channels, including the City's website and social media platforms. Participants present included residents, property owners, and employees who work within the City. Community members asked questions related to housing development opportunities and mixed uses in commercial zones (General Commercial [CG] District, North End Commercial [CNE], and Downtown Commercial [CD]). A recording of the stakeholder meeting is available on the City's website.

### 3.1 Interactive Poll

During the stakeholder meeting, attendees were asked to participate in a poll, which led to feedback from the community to gauge their priorities and identify areas where they would like to see future growth accommodated. Seven individuals submitted responses to one or more questions. The poll indicated that

participants highlighted housing affordability and availability of rental units as the most urgent housing needs in the City. When asked what barriers are slowing the building of more diverse and affordable housing, participants noted lack of available land and development costs. The attendees suggested increasing density, mixed-use, and more housing along commercial corridors as the best strategies to satisfy the City's 6th Cycle Regional Housing Needs Allocation.

#### 4. Planning Commission Meeting

A Planning Commission meeting occurred on September 15, 2021. The meeting was promoted via the City's social media platforms, the City's website, which has translation services available, printed and emailed mailers, including a comprehensive stakeholder list which as previously mentioned includes the Chamber of Commerce, senior groups, individuals, and organizations which represent lower-income groups and people experiencing homelessness, to ensure all income groups are represented in the data and throughout the development of the Housing Element. Planning Commission members were provided with an overview of the Housing Element, including its purpose and required components, and outreach efforts to date as well as upcoming events. An introduction to the Sites Inventory, goals, policies, and programs was also presented by City staff.

Following the presentation, public attendees and Planning Commissioners were invited to engage in an open discussion. Commissioners asked for clarification on the approval process. Concern over incentivizing residential development along major commercial corridors was voiced. A recommendation of allowing mixed-use along these commercial zones was mentioned in response. Furthermore, Planning Commissioners noted concern over increased height, which would adversely impact view corridors. Greater density along Aviation Boulevard, Rosecrans Avenue, and Manhattan Beach Boulevard was recommended, along with encouraging smaller units, such as accessory dwelling units. More clarification related to the Sites Inventory was provided through discussion. A member of the public commented that Manhattan Beach is more than 70 percent of the City is zoned to allow low-density, single-family detached units, therefore restricting the potential capacity of higher-density developments. This member of the public suggested that staff look at the potential of allowing duplex and triplex units in residential zones outside of the major corridor. The term "built-out" previously used by a Planning Commissioner to describe the density and planning capacity of the City was criticized as being subjective. A member of the public mentioned that while the City is built-out, the housing stock is still overall low-density. This member of the public suggested Staff look at the potential of allowing duplex and triplex units in residential zones outside of the major corridors. More members of the public supported this notion. Another member of the public voiced a concern regarding the ability to accommodate a number of parking spaces per townhome based on the current requirements of the City. A member of the Planning Commission clarified that the requirements for parking may be less stringent, as they are dictated by State law and not the City's regulation if a density bonus project is, in fact, proposed. Another member of the public voiced concern over parking regulations and traffic impacts resulting from multifamily housing and increased densities.

## 5. Hometown Fair

City staff was present at an information booth at the Hometown Fair on October 2, 2021. The Hometown Fair is organized by the community in partnership with the City and provides a platform for local businesses, entrepreneurs, artists, and local non-profits to connect with the community. Community members are also provided a platform to promote their civic cause and connect with other community members, both individuals and businesses.- During the Hometown fair, fliers promoting the forthcoming public review period were distributed to the public. City staff were also available to answer any questions regarding the Housing Element update process and fielded high-level inquiries about the process in general. Through the Hometown fair, the City was able to include all members of the community including of various races and ethnicities, and ensure that all persons, including lower-income groups, had an opportunity to connect with City staff, learn about the Housing Element update, and be able to provide feedback on the upcoming public review draft.

## 6. Public Comments

The Housing Element 6th Cycle Public Review Draft was posted to the City's website on October 20, 2021 and ended on November 19, 2021. In addition to posting the public review draft to the City's website, the draft was also advertised through the local newspaper, the City's social media platforms, a notice informing stakeholders was posted at City Hall, and hard copy of the draft was also available at City Hall. An email to interested parties, which includes organizations that represent lower-income groups and people experiencing homelessness, was also sent to notify them of the availability of the public review draft. As mentioned in Section 5, Hometown Fair, above, the City also held an informational booth prior to the release of the public review draft where City staff distributed noticing fliers. Staff also answered questions about the Housing Element and provided an overview of the purpose of the Housing Element to prepare residents for the public review draft. Since outreach throughout the update of the Housing Element has been comprehensive in reaching all members of the community, including lower-income groups, the public review draft noticing methods was able to reach a wide-range of community members. Four public comments were received during the public review period. The general nature of the comments include misinterpretation of comments received during a public workshop included in Appendix F; regarding the unfeasible sites identified for low-income housing in Appendix E; compliance with Affirmatively furthering fair housing as it relates to, identifying site capacity to satisfy the City's RHNA by encouraging mixed-used development, city-wide election requirements, efforts to integrate single family neighborhoods and racially concentrated areas of affluence, and lack of protection against air and noise pollution along Pacific Coast Highway, Sepulveda Blvd., and Manhattan Beach Blvd. Public comments also provide notes and questions regarding various goals and programs included in the Housing Element.

The City has made a diligent effort to correct, address, and incorporate feedback provided, and information requested in the public comments in the Housing Element. The comments from the four comment letters received (see comment letter 1 through 4 attached) are included in **Table 1, Public Comment Summary**, which provides a response and a summary of the changes made to the Housing Element.



**Table 1. Public Comment Summary**

Table ID	Comments	Response/ Changes Made
<u>Refer to public comment letter – Comment Letter 1</u>		
1	<p><u>Quick clarification: On page F-2 and F-3, there is a section referring to public comments: "A member of the public mentioned that while the City is built-out," That member of the public was me. I did say MB is a low density city, but I didn't say MB was "built-out". I said the term "built-out" has no official definition or designation, and the claim that MB is "built-out" is highly subjective and not very convincing, especially considering MB is +70% zoned for single family detached homes which greatly restricts the potential capacity for more homes.</u></p> <p><u>Also, I don't mean to speak for this person, and you can check the transcript, but I think that "Another member of the public voiced concern over parking regulations and traffic impacts resulting from multifamily housing and increased densities." is incorrect as well. That member of the public was expressing concern that the city's excessive parking requirements are inhibiting the development of townhomes. I don't think their comment was implying townhomes have a significant negative effect on parking or traffic.</u></p>	<p><u>Appendix F has been updated to correct the intent of the public comments received during the public meetings.</u></p>
<u>Refer to public comment letter – Comment Letter 2</u>		

<p><u>2</u></p>	<p><u>Please provide a rationale for including Goal 3: Provide a safe and healthy living environment for City residents and the policies associated with the goal (pg4), Program 10: Energy Conservation and Energy Efficiency Opportunities (page 15), program 27: Water Conservation and Green Building Standards (pg31).</u></p> <p><u>It talks about the city's sustainability program but why is it included in this document? Is it required or was it requested to be included by someone?</u></p> <p><u>Also why would this document suggest that the city go beyond state required energy requirements?</u></p> <p><u>Also how will increasing the cost of housing increase the housing stock, in fact the rate of new housing will decrease?</u></p>	<p><u>The Draft Housing Element simply references the City's efforts related to encouraging the use of alternate energy, resource efficiency, and other green building regulations to demonstrate our commitment to "Goal 3" of the Housing Element, which is to provide a safe and healthy living environment for City residents. I'll note that the current (5th cycle) Housing Element includes the same goal. This goal does not in any way dictate specific actions on green building or energy-related regulations: rather it demonstrates that housing is interlinked with these broader policies that do, in turn, impact the health and safety of our residents. These general policies in the Housing Element do not conflict with Council's specific actions and direction (past or future) on the matters. To further clarify the comment about considering opportunities above and beyond State requirements, this relates to specific standards within the Green Building Code that are customized for local implementation, which is how the code in effect today was adopted for certain regulations. The Housing Element does not suggest or propose the increase cost of housing will increase the housing stock.</u></p>
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Refer to public comment letter – Comment Letter 3

3

"Manhattan Beach's Housing Element finds that there are inadequate sites for low income housing. It therefore proposes to rezone various ""sites"" for low income housing, listed on p E-23 to E-26. But these ""sites"" are not sites; they are collections of parcels with various ownerships. Consider Site 5, listed on p E-23 (See original comment or reference page number).

This is all the parcels on a city block that face Highway One, no fewer than nine parcels, with, presumably, nine different ownerships. There's a duplex, a two story sports bar, a marketing agency, and a veterinarian's office. A potential low income builder would have to obtain rights to all nine of these parcels, parcels with, apparently, ongoing uses, in order to build a meager 21 units. There is no way any builder would think this was feasible, particularly when they would only be allowed to build 21 units on the resulting site.

This is just one example of many. Site 2 has eight parcels. Site 3 has 7 parcels. Site 9 has 5 parcels.

Manhattan Beach needs to supply substantial evidence to support the idea that these parcels could be feasibly be consolidated. If there is no such evidence, these ""sites"" need to be replaced with sites that would be feasible. "

The Sites Inventory has been modified to include a clear analysis of lot consolidation efforts in the City and examples of consolidated sites in surrounding cities to support consolidated sites identified in the existing capacity and overlay district. The average and median parcel sizes in the City are considered small and it can be expected that developers will consolidate multiple parcels in order to develop larger multifamily developments and will also likely develop more units than identified as calculations at 20 dwelling units per acre are considered the minimum. Appendix E, sections 4.1.1, 5.1 and 5.2 have been revised to include a more thorough analysis of consolidated sites in the City, including consolidated sites with multiple parcel ownership. Additionally, Program 16, in the Housing element also supports consolidation of sites. A site feasibility study given market and development trends has been included in under section 7.1 of Appendix E.

Refer to public comment letter – Comment Letter 4

4a

Hello, I'm a Manhattan Beach resident.

I appreciate all the hard work that went into the housing element draft so far, including navigating the many requirements from state agencies. I think we all want a swift and efficient approval from HCD. That being said, I have some comments on aspects which are keeping this draft from compliance and risk HCD rejection:

First, an excerpt from the AFFH memo:

“Affirm “Affirmatively” furthering fair housing” means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency’s activities and programs relating to housing and community developmentatively furthering fair housing” means taking meaningful actions, in addition to combating disc.

The City understands the need for and is committed to its duty to affirmatively further fair housing.

<p><u>4b</u></p>	<p>1) <u>Focusing almost entirely on mixed-use development with little history or evidence of significant results.</u></p> <p><u>Similar to most other South Bay cities, MB is apparently focusing mostly on encouraging mixed-use development to satisfy RHNA requirements. The problem though, is that Manhattan Beach has made similar changes in the past (as noted in the draft) yet has permitted few mixed-use residential developments, and an even smaller subset of those have actually been built. Please include real world evidence in the draft that demonstrates how these further changes will result in a significantly increased likelihood of mixed-use development. This evidence should include the times and places that the city made contact with local developers to get their input on what would make such development viable.</u></p>	<p><u>Development of larger multifamily development and affordable housing in the City and surrounding cities has been limited; therefore, the Housing Element relies on available development trends, including planned projects, and market conditions to support the feasibility of residential infill development on sites identified to accommodate the RHNA shortfall. Appendix E, Section 7, has been revised to include a more thorough analysis. The comment mistakenly notes that the City is relying on mixed-use development to satisfy RHNA requirements, while the sites will allow for mixed-use type of development, similar to other zones in the City, the overlay will allow 100% residential development and require at least 50 % of residential development through Program 2, Adequate Sites. The City is incentivizing residential development on these sites through programs in the housing element. The comment notes that few mixed-use residential developments have been permitted and less have been built despite previous City efforts; however, the City does not have control over what is developed but is responsible for ensuring there is capacity in the City. Nevertheless, the City can incentive development through regulatory and financial incentives which are expanded on in Appendix E, section 7.</u></p>
<p><u>4c</u></p>	<p>2) <u>MBMC Section 10.12.030 (city-wide election requirement) is not a valid reason to be out of compliance with AFFH. In fact, that covenant is itself a violation of AFFH.</u></p> <p><u>As stated in the AFFH memo, a fair housing issue is a condition in a geographic area of analysis that restricts fair housing choice or access to opportunity. The statute mentioned on page 36 is precisely that kind of condition. There needs to be a plan included in the housing element to amend those kinds of "rules", it shouldn't be used as an excuse to avoid further changes. It's also unclear what "preserve residential neighborhoods" mean exactly. Preserving from what?</u></p>	<p><u>The AFFH memo lists "voter initiatives that restrict multifamily housing developments, rezoning to higher density, height limits or similar measures that limit housing choices" as an example of common zoning and land use barriers to AFFH.</u></p> <p><u>As analyzed and explained in Appendix C of the Housing Element, the city-wide election requirements included in Section 10.12.030 of the MBMC do not restrict multifamily housing developments and are not considered a constraint to development.</u></p> <p><u>In accordance with Government Code Section 65583, the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Programs in the Housing Element, such as Program 4, 23, and 26, aim to preserve the existing housing stock, including the existing affordable housing stock and existing housing capacity.</u></p>

<p><u>4d</u></p>	<p><u>3) No effort has been made to integrate any single family neighborhood, including the racially concentrated areas of affluence.</u></p> <p><u>As noted in the draft, Manhattan Beach has staggering levels of both racial and class-based segregation. At the same time, the percentage of single family zoning is high even for the South Bay region. I'm not sure how you can acknowledge this reality in the draft yet do absolutely nothing to address it. These kinds of land use policies, which dominate MB, contribute significantly to the cost of housing by constraining supply.</u></p>	<p><u>Although Appendix D does note that Manhattan Beach has staggering levels of both racial and class-based segregation, the comment does not note that this has been identified as a regional issue. The City is limited to changes to reverse these patterns within City boundaries which several programs of the housing element aim to reverse. With regard to integrating single-family neighborhoods including radically concentrated areas of affluence (RCAA), it should be noted that HCD criteria for adequate zones for lower-income RHNA limit the Sites Analysis to identify any lower-income units within Single-family, low-density zones, which includes some of the RCAA identified in Appendix D. The City has added new programs which are tied to County resources and programs to contribute to reversing these segregation patterns at a regional level.</u></p>
<p><u>4e</u></p>	<p><u>4) No protection against air pollution and noise pollution along PCH/Sepulveda and Manhattan Blvd.</u></p> <p><u>Only allowing multifamily residences along high traffic corridors is not a practice that should continue for obvious reasons. Manhattan Beach's own city planning guide recognizes the disruption caused by air/noise pollution, and has attempted to ameliorate in the past with physical infrastructure (The Oak Avenue Overlay District). Single family homeowners should not have exclusive access to fresh air. This should be addressed in the draft.</u></p> <p><u>In conclusion, this draft is well-meaning and better in many ways than the drafts of other South Bay cities (looking at you, Hermosa and Redondo). But in its current state, its obviously attempting to take the path of least resistance by avoiding any changes to the 77% of the city which is composed of highly exclusionary and segregated neighborhoods. There's so many unaddressed issues (reforming the city-wide election requirement, etc). Until a serious attempt is made to address those, I feel it's inadequate and risks being rejected by HCD.</u></p>	<p><u>The Housing Element Update is a policy document, consisting of a housing program, and its adoption would not, in itself, result in specific development or construction at this time. A Negative Declaration was prepared for this project analyzes Air Quality, pursuant to CEQA. Any project under CEQA would be subject to additional analysis as required by CEQA.</u></p>

## ~~6.~~7. Presentation Materials

The following sections provide an overview and copies of the presentation materials used during the City Council meetings, Planning Commission meeting, stakeholder workshop, the Hometown Fair, and results from the interactive poll.

# EXHIBIT A

DUDEK



## Manhattan Beach Housing Element Update

PRESENTED BY THE COMMUNITY DEVELOPMENT DEPARTMENT

AUGUST 24, 2021

### What is a Housing Element?

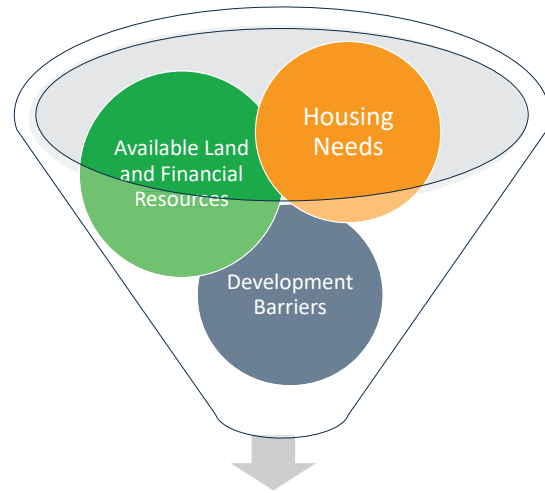
A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029)





# What is the purpose of the Housing Element?

- Identify barriers to housing production
- Identify housing needs
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified



Housing Action Plan

3

# What does the data show?



## Changing Population

- Changing Needs
- Older adults



## Affordability

- Housing Overpayment
- Median Sale Price



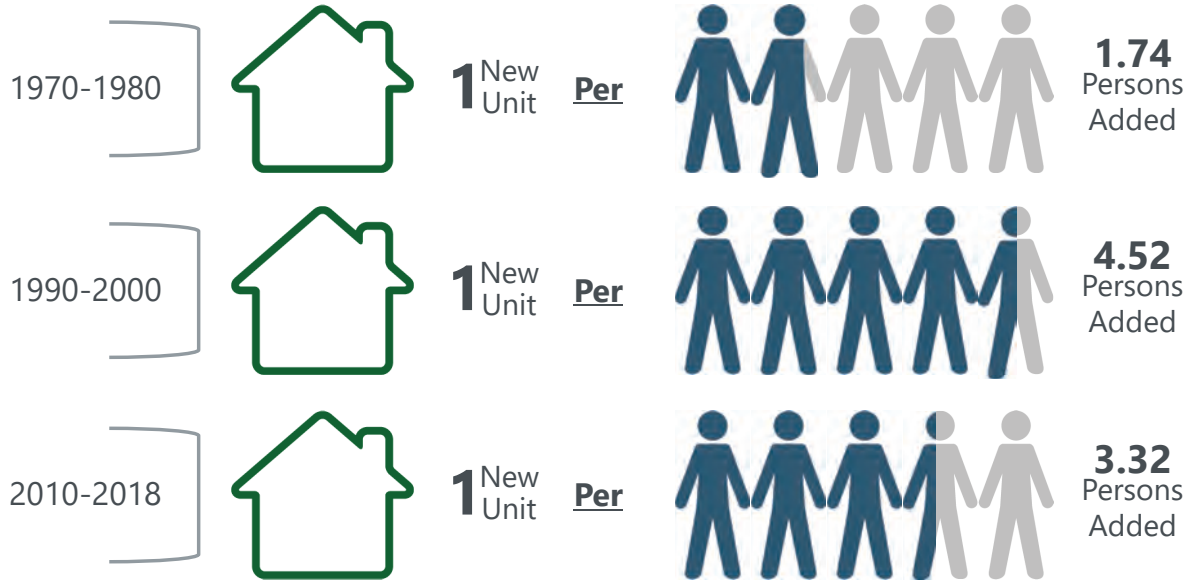
## Housing Options

- Housing Supply



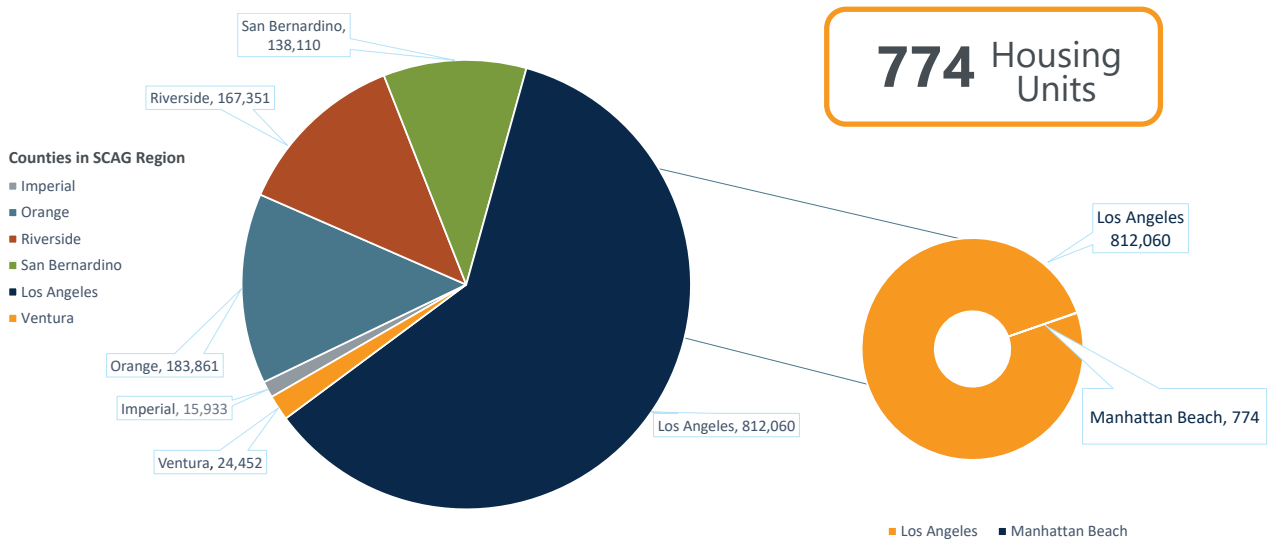
4

# What does the data show?



5

# How many housing units does Manhattan Beach have to plan for?



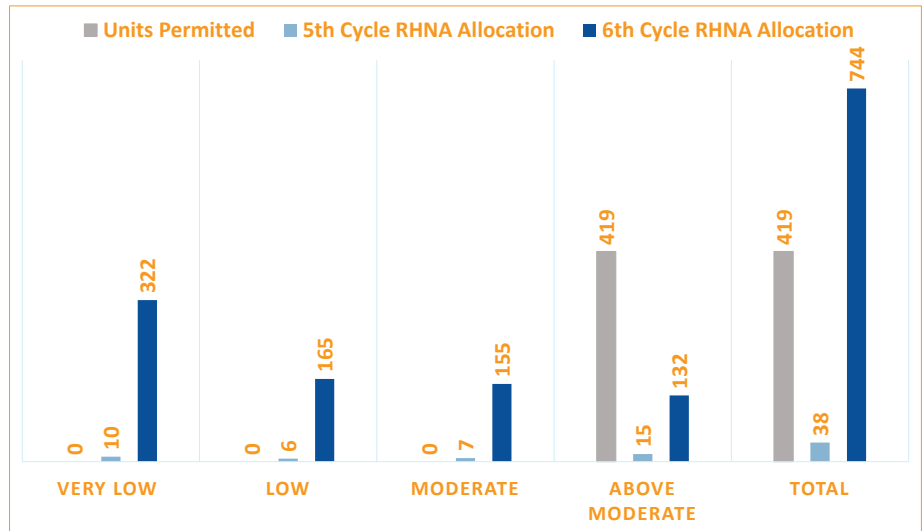
6

# 5<sup>th</sup> Cycle RHNA Progress

Data Reported 2014-2020

**5<sup>th</sup> Cycle  
Average  
Units  
Permitted  
Per Year = 60**

**6<sup>th</sup> Cycle  
Average Units  
Permitted Per  
Year Needed  
= 90**



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## Housing Element Components



# Barriers to Development

## Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

## Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

## Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

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# Pathways to Development

## Tools in the Toolbox



### Regulations

Design Standards

Parking

### Incentives

Bonuses

Streamlining

Regulatory Relief



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# Policy Framework



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# Timeline

Task	Date
Project Kick-Off	July 29, 2021
Prepare Housing Element Draft	August 2 – September 10, 2021
Stakeholder Engagement	August 31, 2021
City Council Study Session	September 21, 2021
Planning Commission Study Session #1	September 22, 2021
Optional Study Session #2	October 2021
Submit Draft to HCD	October 1, 2021
Public Review Period	October 11 – November 25, 2021
Public Hearings (PC and CC)	January – February
Adoption Deadline	February 12, 2022

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Thank you!

Additional questions  
or comments?

Contact us at:  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)

### 6.17.1 City Council Meeting 1

The City Council presentation occurred on August 24, 2021. A copy of the PowerPoint used for the presentation is provided as **Exhibit A**. The PowerPoint provided a detailed description regarding what a Housing Element entails, and a brief overview of how the City is assigned its Regional Housing Needs Allocation.

# EXHIBIT B



## Manhattan Beach Housing Element Update

City Council

September 21, 2021



### Overview

**01** Project Overview

**04** Sites Analysis

**02** Barriers to Development

**05** Next Steps

**03** Policy Framework

**06** Discussion and Q & A





# What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029) required by the State.



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# 2021 Income Limits

Los Angeles County Area Median Income (AMI): \$80,000\*

\*This is the AMI for a four-person household.

Income Level	% AMI Range	Income Limit	HCD-Adjusted Income Limit
Very Low	<50% AMI	<\$40,000	<\$59,100
Low	50% -80% AMI	<\$64,000	<\$94,600
Moderate	80% - 120% AMI	<\$96,000	<\$96,000
Above Moderate	>120% AMI	>\$96,000	>\$96,000

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## What is the purpose of the Housing Element?

- Identify housing needs
- Identify barriers to housing production
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified

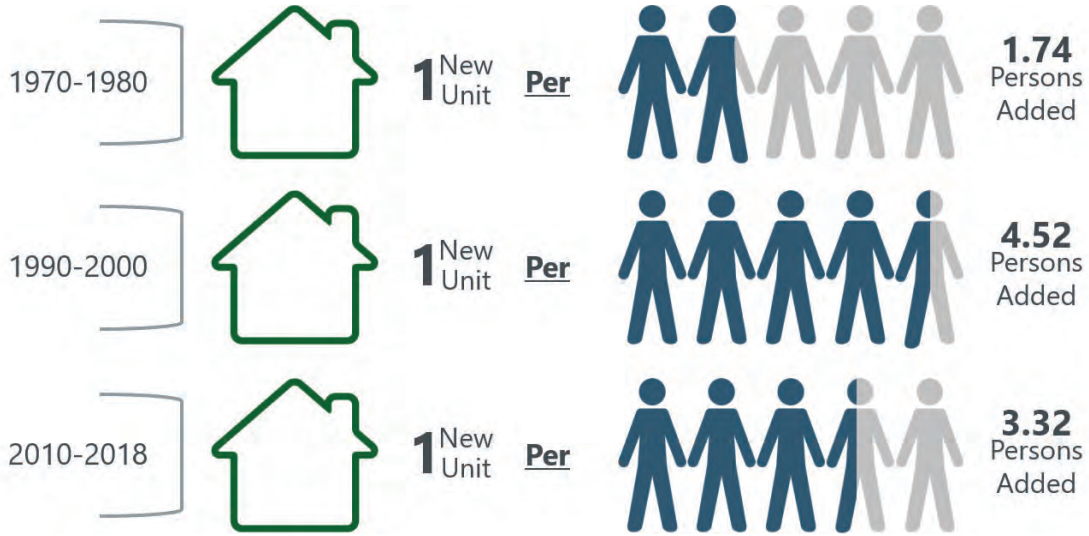
*Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.*



## What does the data show?



# What does the data show?

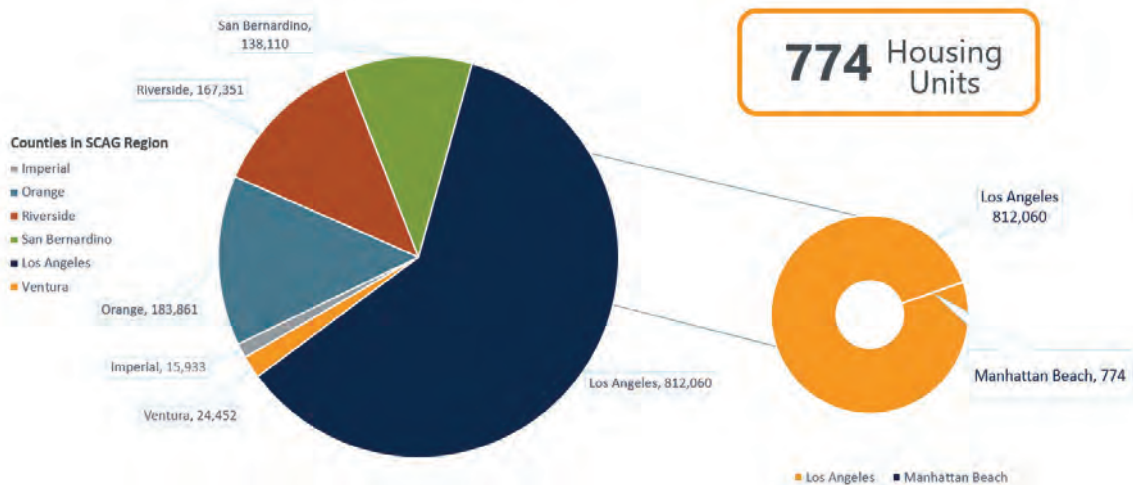


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# How many housing units does Manhattan Beach have to plan for?



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## 5th Cycle RHNA Progress Data Reported 2014-2020

5<sup>th</sup> Cycle  
Average  
Units  
Permitted  
Per Year = 52

6<sup>th</sup> Cycle  
Average Units  
Permitted Per  
Year Needed  
= 96

Income Level	4 <sup>th</sup> Cycle (2005-2013) RHNA	5 <sup>th</sup> Cycle (2013-2021) RHNA	6 <sup>th</sup> Cycle (2021-2029) RHNA	Permitted Since 2014
Very-Low	236	10	322	0
Low	149	6	165	0
Moderate	160	7	155	0
Above Moderate	350	15	132	419
Total	895	38	774	419

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## Housing Element Components



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# What are the barriers to development?

## Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

## Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

## Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

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# Framing Our Policies

Step 1: Review of 5<sup>th</sup> cycle goals (what to carry forward, what needs modification)

- *Goal 1 - Preserve existing neighborhoods- carry policies forward with minor modifications*
- *Goal 2 - Provide a variety of housing opportunities- requires modification and updating*
- *Goal 3 - Provide a safe and healthy living environment for City residents - carry forward*
- *Goal 4 - Encourage the conservation of energy in housing - carry forward*

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## Framing Our Policies

### Step 2: Development of new policies for 6<sup>th</sup> cycle

- *SB 35* - Amend internal procedures and zoning code to include SB 35 streamlining in permitting processes and procedures.
- *AB 1763/SB 2263* - Review and amend its local Density Bonus Program Ordinance to ensure consistency with State requirements.
- *AB 671* - Adopt an ordinance that incentivizes affordable ADUs
- *AB 101* - Amend zoning code to allow low barrier navigation centers
- *AB 1851* - Amend the zoning code to identify a process by which parking requirements can be reduced for religious institutions that would eliminate religious-use parking spaces in exchanged for housing developments



## Sites Analysis - State Requirements

- Adequate Lower-Income Unit Zone
- Has an Improvement-to-Land Ratio (IL Ratio) less than or equal to 1
- Building was built before 1970-1990
- Site is greater than or equal to 0.5 acres
- Realistic Capacity at 20 du/acre  
(*Net Units are greater than or equal to 1*)
- Given that more than 50% of our capacity will be from non-vacant land, sites for the lower income capacity will need to be supported with evidence that the existing use is not an impediment (no sites with large chains/essential uses)



# Existing Lower-Income Capacity Identified

Capacity Identified						
Site Key	APNs	Address	Zone	Acres	Uses	Net Units
1a*	4163-008-023 4163-008-024 4163-008-038	Artesia Blvd / Redondo Ave.	CL	0.62	Closed antique shop, single family residential, offices	12
1b*	4137-001-900 4137-001-904 4137-001-905 4137-001-027	Rosecrans Ave./Highland Ave.	CNE	0.52	Parking, Restaurant	10
1c*	4179-005-003 4179-005-004 4179-005-005 4179-005-006 4179-005-007 4179-005-903	Morningside Dr / Manhattan Beach Blvd.	CD	0.68	Parking Structure, Retail	13
2a	4170-026-003 4170-026-004	1026 -1030 Manhattan Beach Blvd.	CL	0.49	Remax Offices	9
2b	4163-024-028	1535 Artesia Blvd.	RH	0.46	Masonic Center	9
<b>Total</b>	-	-	-	<b>2.77</b>	-	<b>53</b>

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# Preliminary Lower-Income Capacity Analysis

Category	Lower-Income Units
RHNA	487
Pipeline Residential Development Credited Toward RHNA	9
Underutilized Site Capacity	53
Potential Accessory Dwelling Units	50
<b>Total Net-New-Units</b>	<b>112</b>
<b>Total Capacity Deficit (-)</b>	<b>-375</b>
<b>Capacity Deficit – acreage</b>	<b>18.75</b>

Very-low: 322  
Low: 165

Underutilized sites  
CG Zone: 59 acres  
PD Zone: 21 acres

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# Zoning Map



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# Program Requirements

## *Adequate Sites Program Components*

- i. Permit multifamily uses by right for projects in which 20% or more units are affordable for lower-income households.
- ii. Permit the development of at least 16 units per site.
- iii. Permit a minimum of 20 dwelling units per acre.
- iv. If more than 50% of the lower-income sites are zoned to allow mixed-uses, all lower-income sites designated for MU must:
  - a) Allow 100% residential and
  - b) Require at least 50% of floor area to be residential
  - c) Rezone shall occur within 3 years and 120 days from beginning of planning period (10/15/21)

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# Planning Commission Study Session

Comments received included:

- Explore opportunities along:
  - Aviation Blvd.
  - Manhattan Beach Blvd.
  - Rosecrans Ave.
- Explore allowing duplexes and triplexes in certain single-family neighborhoods
- Explore allowing more ADUs than the State allows
- Concerns with commercial corridors



# Next Steps

Task	Date
Stakeholder Meeting	August 31, 2021
Prepare Draft Housing Element	In Progress
CEQA Analysis – IS/MND	September – December 2021
Planning Commission (PC) Study Session #1	September 15, 2021
City Council (CC) Study Session	TODAY
Optional PC Study Session #2	October 2021
Public Draft Review Period	October 11 – November 25, 2021
Public Hearings	PC: January - February 2022 CC: January - February 2022



# OPEN DISCUSSION AND Q & A

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CITY OF MANHATTAN BEACH



Thank you!

Additional questions  
or comments?

Email: Talyn Mirzakhania  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)



### 6.27.2 City Council Meeting 2

The City Council presentation occurred on September 21, 2021. A copy of the PowerPoint used for the presentation is provided as **Exhibit B**. The PowerPoint provided an update on work completed to date, as well as an overview of the Sites Inventory process.

# EXHIBIT C



**DUDEK**



## Manhattan Beach Housing Element Update

STAKEHOLDER MEETING 5:30PM – 7:00PM

AUGUST 31, 2021

1

### Overview

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<b>01</b> Zoom Overview	<b>04</b> Policy Framework
<b>02</b> Project Overview	<b>05</b> Next Steps
<b>03</b> Barriers to Development	<b>06</b> Interactive Poll & Discussion

2

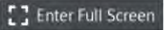
01

# Zoom Overview

3

Before we get started

**Full screen view is recommended for optimal viewing.**

To make the meeting full screen, double-click the meeting window or click the  Enter Full Screen button in the upper-right corner of the Zoom window.

This meeting is being recorded and will be available on the City's website.

If you have issues using Zoom software please use the **Chat** tool for technical help.

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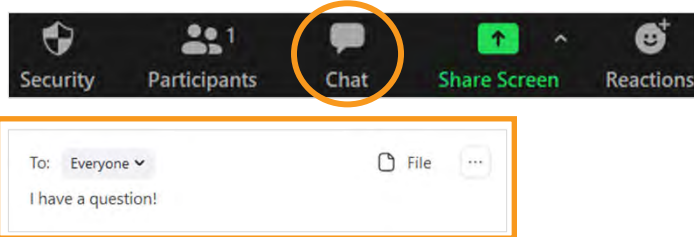
## Before we get started

- Everyone joining the meeting will be “**video off**” and **muted** by default.
- Panelists will be “**video on**” for the duration of the presentation.
- There will be a discussion period at the end of the presentation.
- You may use the **Raise Hand** feature to talk.
- You may use the **Chat** feature throughout the presentation.

STEP 1



STEP 2



5

5

## Before we get started

What is your favorite aspect of living in Manhattan Beach?

6

6

# 02

## Project Overview

7

### What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029) required by the State.

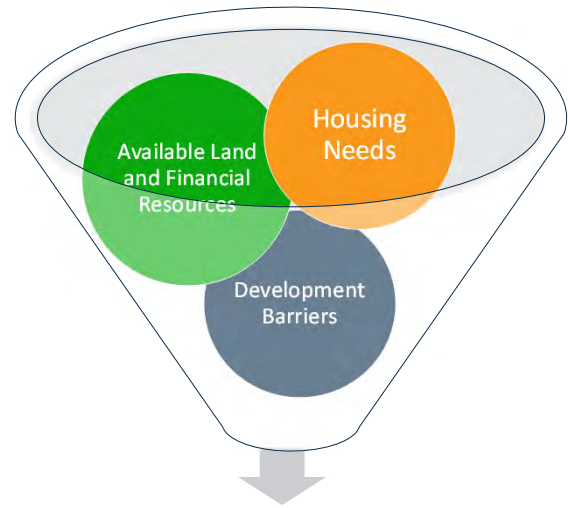


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# What is the purpose of the Housing Element?

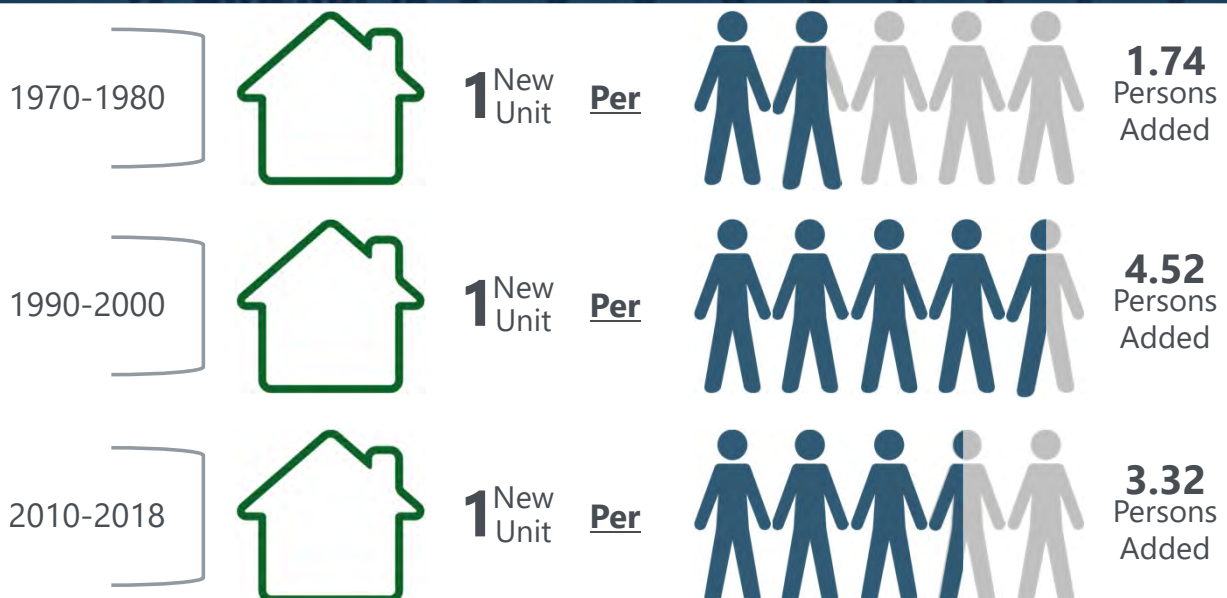
- Identify housing needs
- Identify barriers to housing production
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified



Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.

Housing Action Plan

# What does the data show?





## What does the data show?



### Changing Population

- Changing Needs
- Older adults



### Affordability

- Housing Overpayment
- Median Sale Price



### Housing Options

- Housing Supply



11

11

## 2021 Income Limits

### Los Angeles County Area Median Income (AMI): \$80,000\*

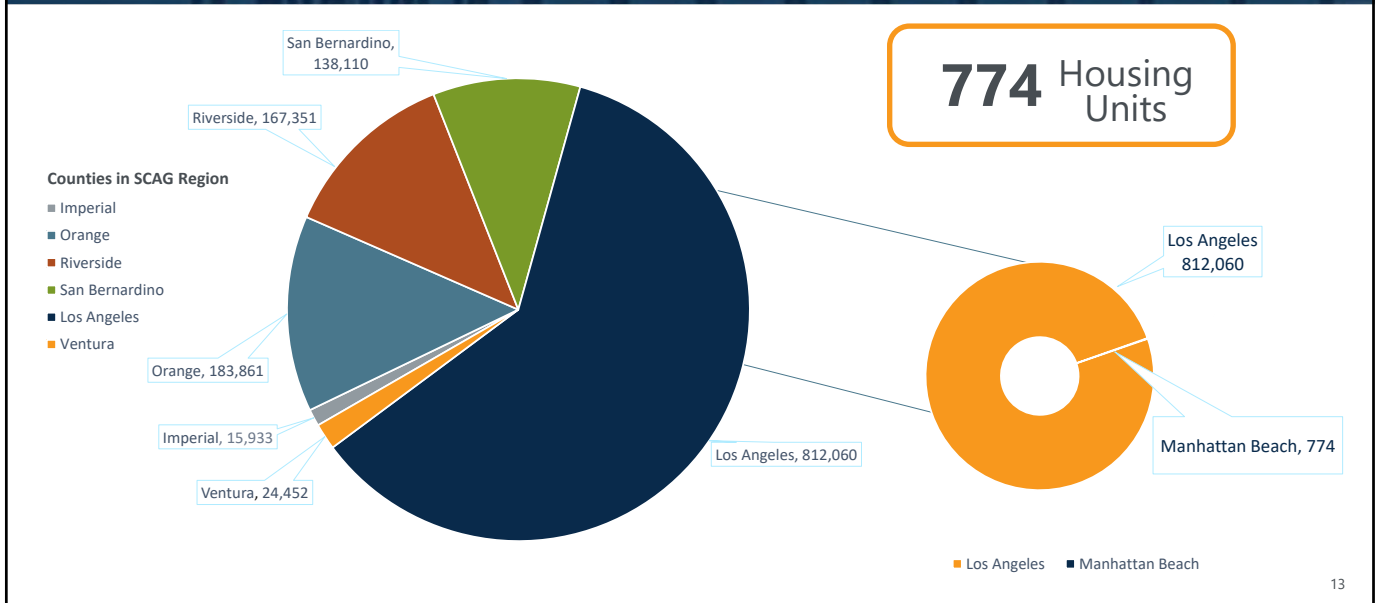
\*This is the AMI for a four-person household.

Income Category	% AMI Range	Income Limit	2021 State Income Limits (Adjusted)
Very Low	<50% AMI	<\$40,000	<\$59,100
Low	50% - 80% AMI	<\$64,000	<\$94,600
Moderate	80% - 120% AMI	<\$96,000	<\$96,000
Above Moderate	>120% AMI	>\$96,000	>\$96,000

12

12

# How many housing units does Manhattan Beach have to plan for?



13

# 5<sup>th</sup> Cycle RHNA Progress Data Reported 2014-2020

**5<sup>th</sup> Cycle Average Units Permitted Per Year = 52**

**6<sup>th</sup> Cycle Average Units Permitted Per Year Needed = 96**

Income Level	4 <sup>th</sup> Cycle (2005-2013) RHNA	5 <sup>th</sup> Cycle (2013-2021) RHNA	6 <sup>th</sup> Cycle (2021-2029) RHNA	Permitted Since 2014
Very-Low	236	10	322	0
Low	149	6	165	0
Moderate	160	7	155	0
Above Moderate	350	15	132	419
<b>Total</b>	<b>895</b>	<b>38</b>	<b>774</b>	<b>419</b>

14

14

## Housing Element Components

Housing Needs Assessment

Fair Housing Analysis

Development Constraints and Barriers

Sites Analysis and Inventory

Goals, Policies, and Programs

15

03

## Barriers to Development

16

# What are the barriers to development?

## Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

## Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

## Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

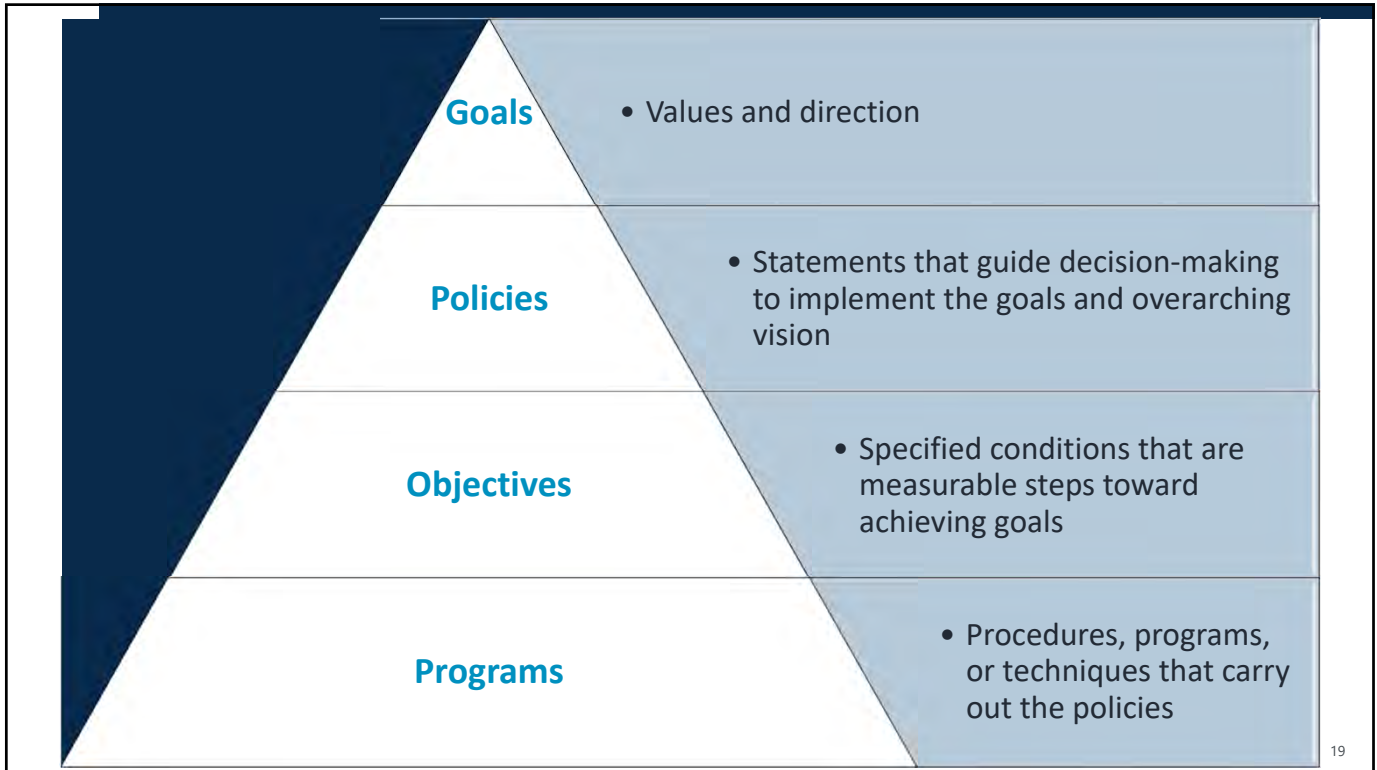
17

17

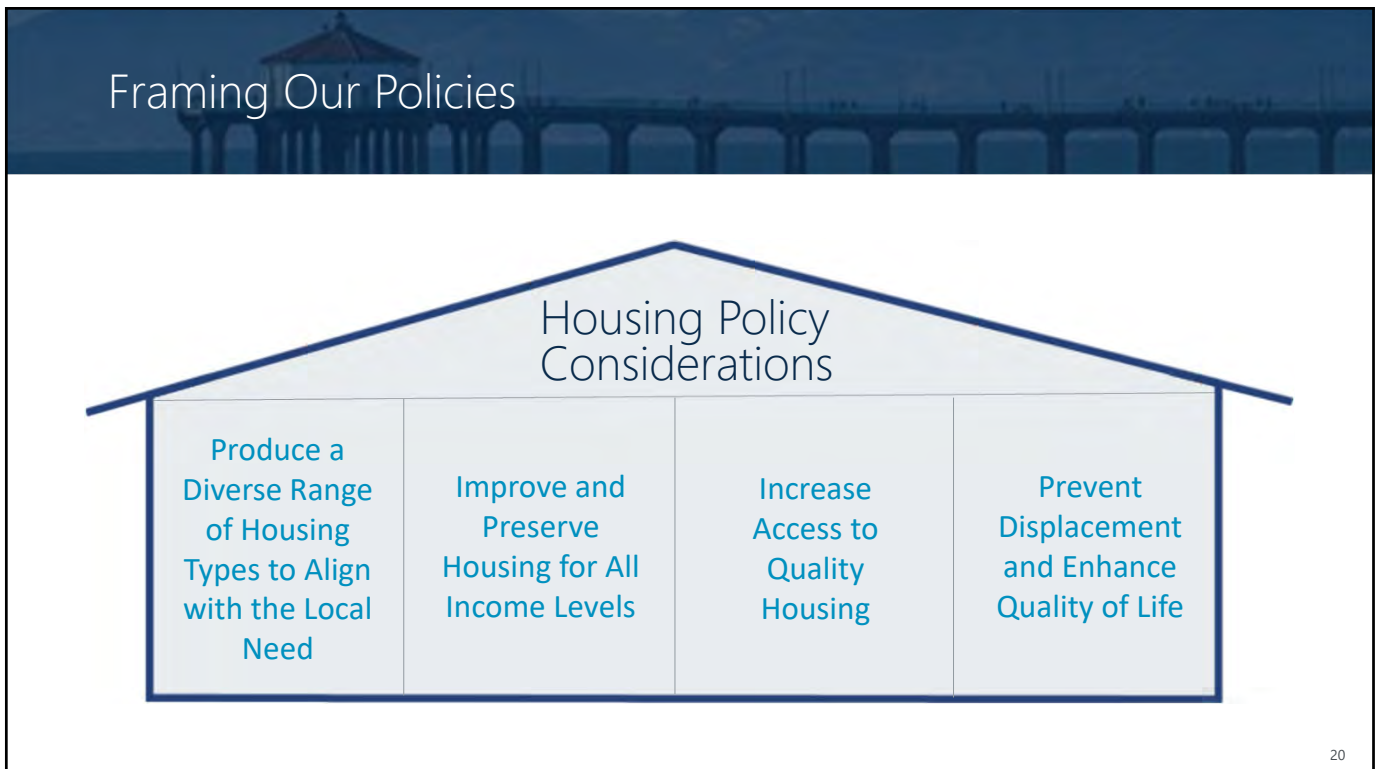
# 04

## Policy Framework

18



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## Policy Examples

- **Policy:** Provide adequate sites to facilitate the development of a diverse range of housing that fulfills its regional housing needs, including low-, moderate- and higher-density single-family attached/detached units and multiple-family units.
- **Policy:** Facilitate the development of housing through the removal of local regulatory constraints, especially for housing that serves lower-income households and those with special needs.
- **Policy:** Implementation practices that prevent displacement and discrimination through enforcement of existing requirements.



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# 05

## Interactive Poll

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## Interactive Poll



23

06

## Next Steps

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## Next Steps

Task	Date
Stakeholder Meeting	Today
Prepare Draft Housing Element	In Progress
Planning Commission (PC) Study Session #1	September 15, 2021
City Council (CC) Study Session	September 21, 2021
Optional PC Study Session #2	October 2021
Public Draft Review Period	October 11 – November 25, 2021
Public Hearings	PC: January - February 2022 CC: January - February 2022

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06

## Open Discussion

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# Thank you!

Next meeting:  
Planning Commission  
Study Session #1  
Sept. 15th - 3pm

Additional questions  
or comments?

Email: Talyn Mirzakhian  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)

### 6.37.3 Stakeholder Meeting

A stakeholder meeting was held on August 31, 2021, that allowed interested parties to be engaged in a more formal setting where they learned about the planning process, the components of the Housing Element, and the importance of their role in development of the Housing Element. A copy of the PowerPoint used for the presentation is provided as **Exhibit C**.

# EXHIBIT D

**Poll Report**

Report Generated:

9/1/2021 8:59

Webinar ID

Actual Start Time

Actual Duration (minutes)

Topic

920 6696 8694

8/31/2021 17:10

93

Manhattan Beach Housing Element Stakeholder Meeting

Poll Details					
#	User Name	User Email	Submitted Date/Time	Question	Answer
1	l p	chicrested@hotmail.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Lack of available land
2	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Cost of development (including cost of land);Community support
3	Margaret Bailey	mbailey@chmgov.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Cost of development (including cost of land)
4	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Cost of development (including cost of land);Community support
5	brandon Straus	brandon@esrou.com	8/31/2021 18:02	What do you feel are the barriers to building more diverse, affordable housing in Manhattan Beach?	Lack of available land;Cost of development (including cost of
6	l p	chicrested@hotmail.com	8/31/2021 18:03	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Other (Please provide additional information in the Chat)
7	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase mixed-use opportunities;Increase density (e.g.
8	Margaret Bailey	mbailey@chmgov.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase housing opportunities along commercial corridors
9	Michael Donahue	mdonahue2021@gmail.com	8/31/2021 18:03	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase density (e.g. allow taller buildings with more housing units)
10	Zac Dean	zakdances@gmail.com	8/31/2021 18:03	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase mixed-use opportunities
11	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase housing opportunities along commercial corridors
12	brandon Straus	brandon@esrou.com	8/31/2021 18:04	Manhattan Beach is required to plan for 774 additional housing units. What do you think is the best strategy for accommodating these homes?	Increase housing opportunities along commercial corridors
13	l p	chicrested@hotmail.com	8/31/2021 18:00	What do you feel are unmet housing needs in Manhattan Beach?	I do not feel there are unmet housing needs
14	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 18:00	What do you feel are unmet housing needs in Manhattan Beach?	Diversity in housing stock e.g., duplexes, apartments, granny
15	Margaret Bailey	mbailey@chmgov.com	8/31/2021 18:00	What do you feel are unmet housing needs in Manhattan Beach?	General housing affordability
16	Michael Donahue	mdonahue2021@gmail.com	8/31/2021 18:01	What do you feel are unmet housing needs in Manhattan Beach?	Availability of rental units
17	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 18:01	What do you feel are unmet housing needs in Manhattan Beach?	Diversity in housing stock e.g., duplexes, apartments, granny
18	l p	chicrested@hotmail.com	8/31/2021 17:58	What is your top priority for new housing?	Other (Please provide additional information in the Chat)
19	Barbara Siegemund-	bsiegemundbroka@gmail.com	8/31/2021 17:58	What is your top priority for new housing?	Affordability
20	Margaret Bailey	mbailey@chmgov.com	8/31/2021 17:58	What is your top priority for new housing?	Other (Please provide additional information in the Chat)
21	Michael Donahue	mdonahue2021@gmail.com	8/31/2021 17:58	What is your top priority for new housing?	Affordability
22	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 17:58	What is your top priority for new housing?	Ownership options

#### 6.47.4 Interactive Poll Results

The results from the interactive poll conducted during the stakeholder meeting on August 31, 2021, are shown in **Exhibit D**.

### 6.57.5 Planning Commission Meeting

The Planning Commission presentation occurred on September 15, 2021. A copy of the PowerPoint used for the presentation is provided as **Exhibit E**. The PowerPoint provided a detailed description regarding what a Housing Element entails, and a brief overview of how the City is assigned its Regional Housing Needs Allocation.

# EXHIBIT E

**DUDEK**



## Manhattan Beach Housing Element Update

PLANNING COMMISSION MEETING 3:00PM

SEPTEMBER 15, 2021

### Overview

**01** Project Overview

**04** Sites Analysis

**02** Barriers to Development

**05** Next Steps

**03** Policy Framework

**06** Discussion and Q & A

## What is a Housing Element?

A set of goals, policies, and actions that address the housing needs of all current and anticipated residents at all income levels over eight-years (2021-2029) required by the State.



3

## 2021 Income Limits

### Los Angeles County Area Median Income (AMI): \$80,000\*

\*This is the AMI for a four-person household.

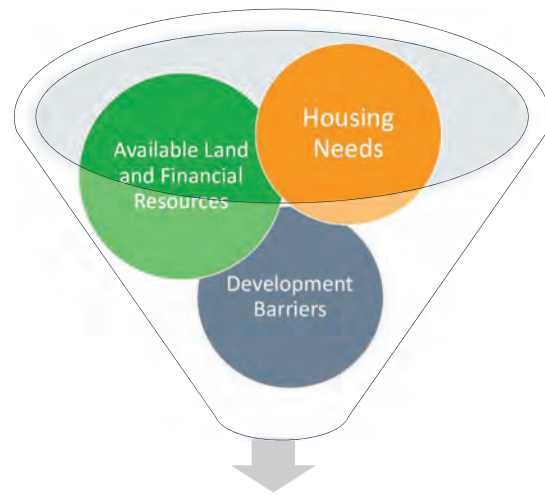
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4

## What is the purpose of the Housing Element?

- Identify housing needs
- Identify barriers to housing production
- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified

Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.



Housing Action Plan

5

## What does the data show?



### Changing Population

- Changing Needs
- Older adults



### Affordability

- Housing Overpayment
- Median Sale Price



### Housing Options

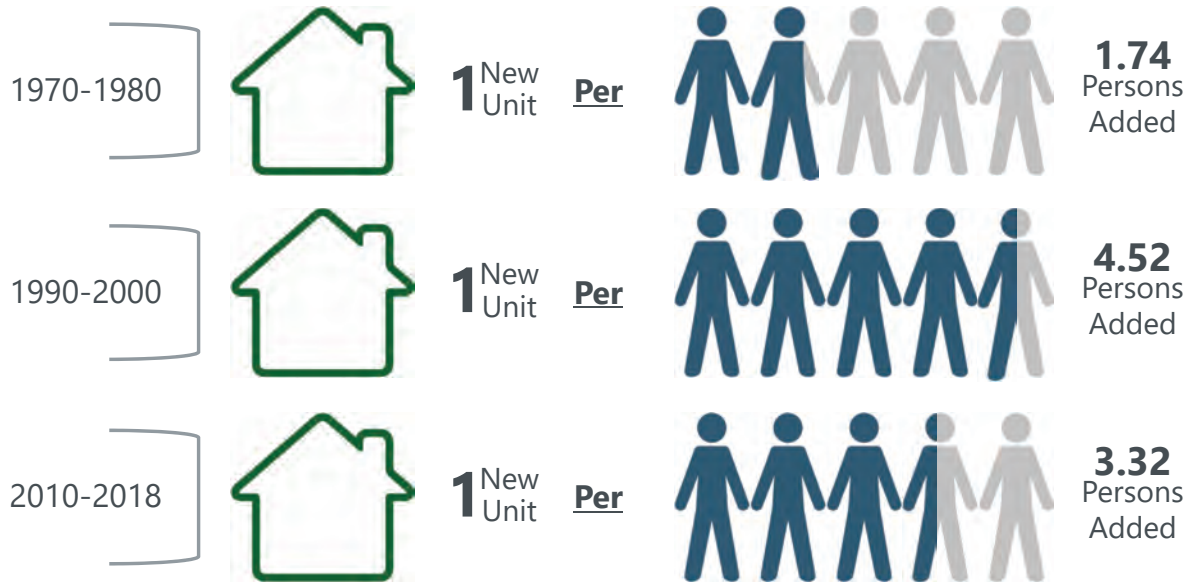
- Housing Supply



6

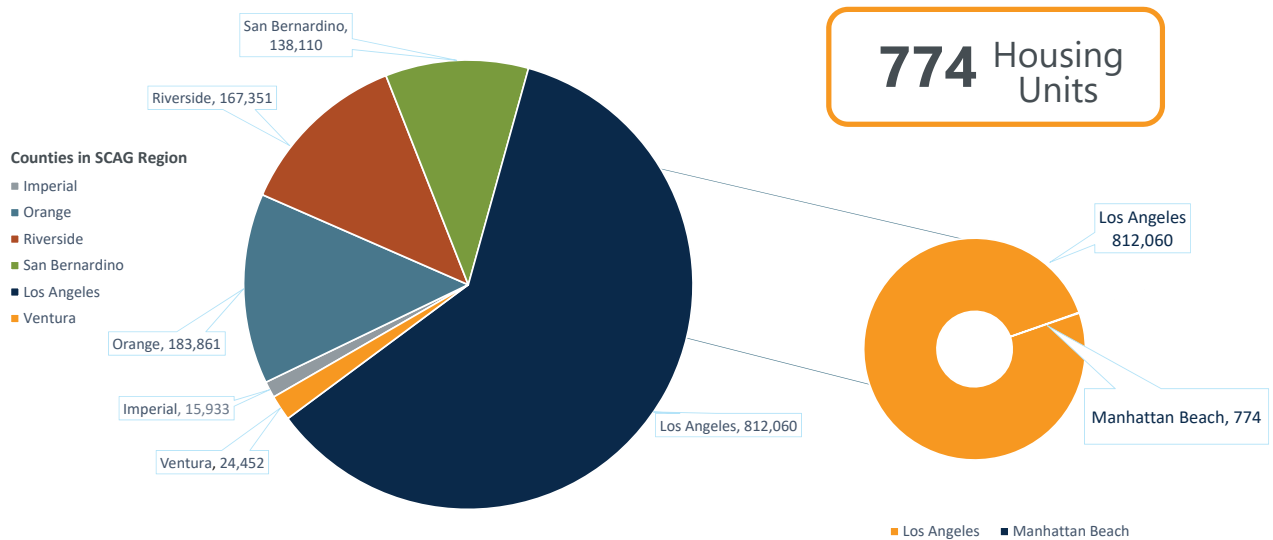


## What does the data show?



7

## How many housing units does Manhattan Beach have to plan for?



8

# 5<sup>th</sup> Cycle RHNA Progress

Data Reported 2014-2020

**5<sup>th</sup> Cycle  
Average  
Units  
Permitted  
Per Year = 52**

**6<sup>th</sup> Cycle  
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Permitted Per  
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= 96**

Income Level	4 <sup>th</sup> Cycle (2005-2013) RHNA	5 <sup>th</sup> Cycle (2013-2021) RHNA	6 <sup>th</sup> Cycle (2021-2029) RHNA	Permitted Since 2014
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## Housing Element Components



## What are the barriers to development?

### Governmental



- Land Use Controls
- Development Standards
- Permitting Procedures
- Site Improvements

### Market



- Land Costs
- Availability of Vacant Land
- Labor & Construction Costs
- Availability of Financing

### Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

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## Framing Our Policies

Step 1: Review of 5<sup>th</sup> cycle goals (what to carry forward, what needs modification)

- **Goal 1** - *Preserve existing neighborhoods- carry policies forward with minor modifications*
- **Goal 2** - *Provide a variety of housing opportunities- requires modification and updating*
- **Goal 3** - *Provide a safe and healthy living environment for City residents – carry forward*
- **Goal 4** - *Encourage the conservation of energy in housing – carry forward*

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## Framing Our Policies

### Step 2: Development of new policies for 6<sup>th</sup> cycle

- **SB 35** - Amend internal procedures and zoning code to include SB 35 streamlining in permitting processes and procedures.
- **AB 1763/SB 2263** - Review and amend its local Density Bonus Program Ordinance to ensure consistency with State requirements.
- **AB 671** - Adopt an ordinance that incentivizes affordable ADUs
- **AB 101** - Amend zoning code to allow low barrier navigation centers
- **AB 1851** - Amend the zoning code to identify a process by which parking requirements can be reduced for religious institutions that would eliminate religious-use parking spaces in exchanged for housing developments

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## Sites Analysis Requirements

- Adequate Lower-Income Unit Zone
- Has an Improvement-to-Land Ratio (IL Ratio) less than or equal to 1
- Building was built before 1970-1990
- Site is greater than or equal to 0.5 acres
- Realistic Capacity at 20 du/acre  
(*Net Units are greater than or equal to 1*)
- Given that more than 50% of our capacity will be from non-vacant land, sites for the lower income capacity will need to be supported with evidence that the existing use is not an impediment (no sites with large chains/essential uses)

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# Capacity Identified

Capacity Identified						
Site Key	APNs	Address	Zone	Acres	Uses	Net Units
1a*	4163-008-023 4163-008-024 4163-008-038	Artesia Blvd / Redondo Ave.	CL	0.62	Closed antique shop, single family residential, offices	12
1b*	4137-001-900 4137-001-904 4137-001-905 4137-001-027	Rosecrans Ave / Highland Ave.	CNE	0.52	Parking, Restaurant	10
1c*	4179-005-003 4179-005-004 4179-005-005 4179-005-006 4179-005-007 4179-005-903	Morningside Dr / Manhattan Beach Blvd.	CD	0.68	Parking Structure, Retail	13
2a	4170-026-003 4170-026-004	1026 - 1030 Manhattan Beach Blvd.	CL	0.49	Remax Offices	9
2b	4163-024-028	1535 Artesia Blvd.	RH	0.46	Masonic Center	9
<b>Total</b>	-	-	-	<b>2.77</b>	-	<b>53</b>

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# Opportunities for Additional Capacity



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## Capacity Analysis

Category	Lower-Income Units
RHNA	487
Pipeline Residential Development Credited Toward RHNA	9
Underutilized Site Capacity	53
Potential Accessory Dwelling Units	50
<b>Total Net-New-Units</b>	<b>112</b>
<b>Total Capacity Deficit (-)</b>	<b>-375</b>
<b>Capacity Deficit – acreage</b>	<b>18.75</b>

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## Program Requirements

### *Adequate Sites Program Components*

- i. Permit multifamily uses by right for projects in which 20% or more units are affordable for lower-income households.
- ii. Permit the development of at least 16 units per site.
- iii. Permit a minimum of 20 dwelling units per acre.
- iv. If more than 50% of the lower-income sites are zoned to allow mixed-uses, all lower-income sites designated for MU must:
  - a) Allow 100% residential and
  - b) Require at least 50% of floor area to be residential
  - c) Rezone shall occur within 3 years and 120 days from beginning of planning period (10/15/21)

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## Next Steps

Task	Date
Stakeholder Meeting	August 31, 2021
Prepare Draft Housing Element	In Progress
CEQA Analysis – IS/MND	September – December 2021
Planning Commission (PC) Study Session #1	Today
City Council (CC) Study Session	September 21, 2021
Optional PC Study Session #2	October 2021
Public Draft Review Period	October 11 – November 25, 2021
Public Hearings	PC: January - February 2022 CC: January - February 2022

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# OPEN DISCUSSION AND Q & A



# Thank you!

Next meeting:  
City Council  
Study Session  
Sept. 21st - 6pm

Additional questions  
or comments?

Email: Talyn Mirzakhania  
[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)



### 6.67.6 Hometown Fair

City staff attended the Hometown Fair on October 2, 2021. A copy of the flier that was distributed at the information booth is provided as **Exhibit F**.

EXHIBIT F

# WE WANT YOUR INPUT!

## 6TH CYCLE HOUSING ELEMENT UPDATE



**The City is updating its Housing Element!\***

**Stay tuned for the release of the Draft Housing Element, which will be available for public review mid-October through the end of November.**

### **STAY INFORMED!**

Sign up on our Housing Element Update Interested Parties list by sending an email to

**[heupdate2021@manhattanbeach.gov](mailto:heupdate2021@manhattanbeach.gov)**

or view our webpage for updates and information:

**[www.manhattanbeach.gov/6thcycle](http://www.manhattanbeach.gov/6thcycle)**

\*The Housing Element is one of the State-mandated Elements of a General Plan, and it is required to be updated every eight years and certified by the State Department of Housing and Community Development. The Housing Element analyzes community housing needs in terms of affordability, availability, adequacy, and accessibility, and describes the City's strategy and programs to address those needs.



# LETTER 1

---

**From:** Talyn Mirzakhianian <tmirzakhianian@manhattanbeach.gov> on behalf of HE Update 2021 <HEupdate2021@manhattanbeach.gov>  
**Sent:** Friday, October 22, 2021 11:53 AM  
**To:**  
**Subject:** FW: [EXTERNAL] Public comments incorrect

**From:** Zac Dean <zakdances@gmail.com>  
**Sent:** Wednesday, October 20, 2021 8:46 PM  
**To:** HE Update 2021 <HEupdate2021@manhattanbeach.gov>  
**Subject:** [EXTERNAL] Public comments incorrect

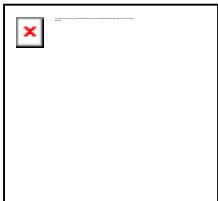
**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hello, MB resident here. Thanks for all your work on the housing element.

Quick clarification: On page F-2 and F-3, there is a section referring to public comments: "A member of the public mentioned that while the City is built-out,"

That member of the public was me. I did say MB is a low density city, but I didn't say MB was "built-out". I said the term "built-out" has no official definition or designation, and the claim that MB is "built-out" is highly subjective and not very convincing, especially considering MB is +70% zoned for single family detached homes which greatly restricts the potential capacity for more homes.

Also, I don't mean to speak for this person, and you can check the transcript, but I think that "Another member of the public voiced concern over parking regulations and traffic impacts resulting from multifamily housing and increased densities." is incorrect as well. That member of the public was expressing concern that the city's excessive parking requirements are inhibiting the development of townhomes. I don't think their comment was implying townhomes have a significant negative effect on parking or traffic.



HE UPDATE 2021

HEupdate2021@manhattanbeach.gov

The City of Manhattan Beach continues to care about your health and safety. The [Citizen Self Service \(CSS\) Online Portal](#) is available for City permit and planning applications and inspections. Most Community Development services are available [online](#) and various divisions can be reached at (310) 802-5500 or [Email](#) during normal City business hours.

CITY OF MANHATTAN BEACH 1400 Highland Avenue Manhattan Beach, CA 90266

[Office Hours](#): M-Th 8:00 AM-5:00 PM | Fridays 8:00 AM-4:00 PM | Not Applicable to Public Safety

[Reach Manhattan Beach](#) Here for you 24/7, use our click and fix it app

Download the mobile app now

# LETTER 2

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**From:** Phillips Lee <leephillipsmd@yahoo.com>  
**Sent:** Thursday, November 18, 2021 5:37 PM  
**To:** HE Update 2021  
**Subject:** [EXTERNAL] 6th Cycle Housing Element Update

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Please provide a rationale for including Goal 3: Provide a safe and healthy living environment for City residents and the policies associated with the goal (pg4)  
Program 10: Energy Conservation and Energy Efficiency Opportunities (page 15)  
program 27: Water Conservation and Green Building Standards (pg31)  
It talks about the city's sustainability program but why is it included in this document?  
Is it required or was it requested to be included by someone?  
Also why would this document suggest that the city go beyond state required energy requirements?  
Also how will increasing the cost of housing increase the housing stock, in fact the rate of new housing will decrease?

Thanks  
Lee

# LETTER 3

**From:** Anne Paulson <anne.paulson@gmail.com>  
**Sent:** Tuesday, November 30, 2021 4:59 PM  
**To:** HE Update 2021  
**Cc:** housingelements@yimbylaw.org  
**Subject:** [EXTERNAL] Manhattan Beach Draft Housing Element: The "Sites" are not sites

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

To whom it may concern:

Manhattan Beach's Housing Element finds that there are inadequate sites for low income housing. It therefore proposes to rezone various "sites" for low income housing, listed on p E-23 to E-26. But these "sites" are not sites; they are collections of parcels with various ownerships. Consider Site 5, listed on p E-23:

FIBRO 11/30/21, 09:11:19 AM							
5	4170006023 4170006019 4170006018 4170006017 4170006022 4170006015 4170006028 4170006027 4170006013	5	CG	Z	1.15	21	Stand-alone shipping and mailing store with surface parking (APN 4170006019, LTI ratio 0.26, Built 1965) Stand-alone marketing agency (APN 4170006018, LTI ratio 0.06, Built 1950). Duplex with 2 existing residential units (APN 4170006017, LTI ratio 0.22, Built 1949) Two-story commercial building with a sports bar and office spaces with a large surface parking lot (APN 4170006022, LTI ratio 0.39, Built 1954). Stand-alone commercial building with a tailor and insurance agency office with surface parking (APN 4170006015, LTI ratio 0.26, Built 1955) Ingress and egress to surrounding uses (APN 4170006028, LTI ratio N/A), Auto service shop (APN

This is all the parcels on a city block that face Highway One, no fewer than nine parcels, with, presumably, nine different ownerships. There's a duplex, a two story sports bar, a marketing agency, and a veterinarian's office. A potential low income builder would have to obtain rights to all nine of these parcels, parcels with, apparently, ongoing uses, in order to build a meager 21 units. There is no way any builder would think this was feasible, particularly when they would only be allowed to build 21 units on the resulting site.

This is just one example of many. Site 2 has eight parcels. Site 3 has 7 parcels. Site 9 has 5 parcels.

Manhattan Beach needs to supply substantial evidence to support the idea that these parcels could be feasibly be consolidated. If there is no such evidence, these "sites" need to be replaced with sites that would be feasible.

Sincerely,

Anne Paulson

# LETTER 4

**From:** Zac Dean <zakdances@gmail.com>  
**Sent:** Tuesday, November 30, 2021 11:50 PM  
**To:** HE Update 2021  
**Subject:** [EXTERNAL] Housing Element comment: Current draft not in compliance with AFFH and other issues

**CAUTION:** This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

Hello, I'm a Manhattan Beach resident.

I appreciate all the hard work that went into the housing element draft so far, including navigating the many requirements from state agencies. I think we all want a swift and efficient approval from HCD. That being said, I have some comments on aspects which are keeping this draft from compliance and risk HCD rejection:

First, an excerpt from the AFFH memo:

“Affirm” Affirmatively  
furthering  
fair  
housing” means  
taking

meaningful  
actions,  
in  
addition  
to

combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency’s activities and programs relating to housing

and community development. affirmatively furthering fair housing”

means taking meaningful actions, in addition to

combating disc

**1) Focusing almost entirely on mixed-use development with little history or evidence of significant results.**

Similar to most other South Bay cities, MB is apparently focusing mostly on encouraging mixed-use development to satisfy RHNA requirements. The problem though, is that Manhattan Beach has made similar changes in the past (as noted in the draft) yet has permitted few mixed-use residential developments, and an even smaller subset of those have actually been built. **Please**

**include real world evidence in the draft that demonstrates how these further changes will result in a significantly increased likelihood of mixed-use development.** This evidence should include the times and places that the city made contact with local developers to get their input on what would make such development viable.

**2) MBMC Section 10.12.030 (city-wide election requirement) is not a valid reason to be out of compliance with AFFH. In fact, that covenant is itself a violation of AFFH.**

As stated in the AFFH memo, *a fair housing issue is a condition in a geographic area of analysis that restricts fair housing choice or access to opportunity.* The statute mentioned on page 36 **is precisely that kind of condition.** There needs to be a plan included in the housing element to amend those kinds of "rules", it shouldn't be used as an excuse to avoid further changes. It's also unclear what "preserve residential neighborhoods" mean exactly. Preserving from what?

**3) No effort has been made to integrate any single family neighborhood, including the racially concentrated areas of affluence.**

As noted in the draft, Manhattan Beach has staggering levels of both racial and class-based segregation. At the same time, the percentage of single family zoning is high even for the South Bay region. I'm not sure how you can acknowledge this reality in the draft yet do absolutely nothing to address it. These kinds of land use policies, which dominate MB, contribute significantly to the cost of housing by constraining supply.

**4) No protection against air pollution and noise pollution along PCH/Sepulveda and Manhattan Blvd.**

Only allowing multifamily residences along high traffic corridors is not a practice that should continue for obvious reasons. Manhattan Beach's own city planning guide recognizes the disruption caused by air/noise pollution, and has attempted to ameliorate in the past with physical infrastructure (The Oak Avenue Overlay District). Single family homeowners should not have exclusive access to fresh air. This should be addressed in the draft.

In conclusion, this draft is well-meaning and better in many ways than the drafts of other South Bay cities (looking at you, Hermosa and Redondo). But in its current state, it's obviously attempting to take the path of least resistance by avoiding any changes to the 77% of the city which is composed of highly exclusionary and segregated neighborhoods. There's so many unaddressed issues (reforming the city-wide election requirement, etc). Until a serious attempt is made to address those, I feel it's inadequate and risks being rejected by HCD.

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Final Negative Declaration

# **City of Manhattan Beach General Plan Amendment: 6th Cycle Housing Element Update**

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**JANUARY 2022**

*Prepared for:*

**CITY OF MANHATTAN BEACH**

1400 Highland Avenue

Manhattan Beach, California 90266

*Contact: Talyn Mirzakhanian, Planning Manager*

*Prepared by:*

**DUDEK**

38 North Marengo Avenue

Pasadena, California 91101

*Contact: Nicole Cobleigh*



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**ATTACHMENTS**

A Notice of Intent Comment Letter

# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADU	Accessory Dwelling Unit
AMI	Area Median Income
BMP	Best Management Practice
CAA	Clean Air Act
CalGEM	California Geology Energy Management Division
CARB	California Air Resources Board
CBC	California Building Code
CCA	California Coastal Act
CCC	California Coastal Commission
CDBG	Community Development Block Grant
CDOC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CGS	California Geologic Society
City	City of Manhattan Beach
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CWA	Clean Water Act
DACs	Disadvantaged Communities
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transportation Administration
GHG	Greenhouse Gas
GPA	General Plan Amendment
HCD	Housing and Community Development
HCP	Habitat Conservation Plan
HEU	Housing Element Update
HRC	Housing Rights Center
IS	Initial Study
JADU	Junior Accessory Dwelling Unit
LACDPW	Los Angeles County Department of Public Works
LCP	Local Coastal Program
LOS	Level of Service

Acronym/Abbreviation	Definition
MBTA	Migratory Bird Treaty Act
MBUSD	Manhattan Beach Unified School District
MTA	Los Angeles County Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWELO	Model Water Efficient Landscape Ordinance
NAHC	Native American Heritage Commission
NRCS	Natural Resources Conservation Service
ND	Negative Declaration
NPDES	National Pollution Discharge Elimination System
OPR	Governor’s Office of Planning and Research
PCH	Pacific Coast Highway
PD	Planned Development District
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SB	Senate Bill
SBCCPOG	South Bay Cities Council of Governments
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SMARA	Surface Mining and Reclamation Act of 1975
SWPPP	Stormwater Pollution Prevention Plans
SWRCB	State Water Resources Control Board
TCAC	California Tax Credit Allocation Committee
TCR	Tribal Cultural Resource
TDSP	Transit District Specific Plan
TMDL	Total Maximum Daily Load
USDA	United States Department of Agriculture
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
WBMWD	West Basin Municipal Water District
WSAP	Water Supply Allocation Plan
WSCP	Water Shortage Contingency Plan



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# 1 Introduction

## 1.1 Project Overview

The purpose of the Housing Element Update (HEU) is to provide an update to the Housing Element of the City of Manhattan Beach's (City's) General Plan. The intent of the HEU is to address the comprehensive housing needs of the City. State law requires jurisdictions to update their Housing Element every eight years to outline their existing and projected housing needs, to discuss barriers to providing that housing, and to propose actions to address housing needs and barriers. The programs proposed in the HEU are intended to be implemented over an eight-year planning horizon (2021-2029).

## 1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA), a statewide environmental law described in California Public Resources Code, Sections 21000 *et seq.*, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

The City's Community Development Department directed and supervised the preparation of this Initial Study (IS)/ Negative Declaration (ND). Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this IS/ND reflect the independent judgment of the City. The IS/ND was made available for public review between November 24, 2021 and December 27, 2021.

## 1.3 Project Planning Setting

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the project.

For this IS/ND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact
2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the project.

The IS/ND was made available for public review between November 24, 2021 and December 27, 2021. One comment letter was received from the California Department of Transportation on December 17, 2021 (Attachment A, Notice of Intent Comment Letter). No revisions to the IS/ND are required in response to public comments received during the circulation of the Draft IS/ND.

---

## 2 Project Description

The HEU proposes an update to the City of Manhattan Beach’s (City’s) General Plan. Under the HEU, the General Plan would be amended with updates to the Housing Element, as detailed below.

### 2.1 Background

Since 1969, the State of California has required all local governments to adequately plan to meet the housing needs of everyone in the community. California’s local governments meet this requirement by adopting housing plans as part of their “general plan.” The law mandating that housing be included as an element of each jurisdiction’s general plan is known as “housing-element law.”

The HEU represents the City’s effort in fulfilling the requirements under State Housing Element law. The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the State’s major housing goal. Recognizing the important role of local planning and housing programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of the comprehensive General Plan.

Pursuant to State law, the Housing Element must be updated periodically according to statutory deadlines. The proposed Housing Element Update (HEU) covers the planning period of October 15, 2021 to October 15, 2029.

State Law requires that the Housing Element include the following components:

- An evaluation of the efficacy of the previous Housing Element’s progress in plan implementation and appropriateness of the goals, policies, and programs.
- An analysis of the City’s population, household, and employment base, and the characteristics of the housing stock.
- A summary of the present and projected housing needs of the City’s households.
- A review of potential constraints to meeting the City’s identified housing needs.
- An evaluation of Fair Housing to identify disproportionate housing needs.
- A statement of the Housing Plan to address the identified housing needs, including housing goals, policies, objectives, and programs.

The City’s Housing Element is being updated at this time in conformance with the 2021-2029 update cycle for jurisdictions in the Southern California Association of Governments (SCAG) region. The HEU builds upon the other General Plan elements and is consistent with the policies set forth by the General Plan, as amended. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.

### 2.2 Regional Housing Needs Assessment (RHNA)

The California Department of Housing and Community Development (HCD) is required to prepare a Regional Housing Needs Assessment (RHNA) for each Council of Governments in the State that identifies projected residential dwelling units (“units”) needed for all economic segments based on Department of Finance population

estimates. The Southern California Association of Governments (SCAG) is the Council of Governments for Los Angeles County (County) (as well as Ventura, Riverside, Orange, San Bernardino, and Imperial Counties) and allocates to the six counties and 191 cities and the unincorporated County areas their fair share of the total RHNA housing needed for each income category. Each local government must demonstrate that it has planned to accommodate all of its regional housing need allocation in its Housing Element. The City has been assigned a 6th Cycle RHNA allocation (RHNA allocation) of 774 units for the 2021–2029 Housing Element (proposed Housing Element), broken down as follows: 487 lower income units, 155 moderate income units, and 132 above-moderate income units . In addition to accommodating the RHNA allocation, the City will provide sites with the capacity to accommodate an additional 73 units to comply with the lower-income “buffer” requirement ensuring that enough capacity remains throughout proposed Housing Element’s eight year planning period to provide adequate housing.<sup>1</sup>

Because the City does not have large swaths of land available for development, there are no opportunities to identify new housing capacity on undeveloped lands. With no vacant sites, the City’s housing capacity is identified in the form of underutilized sites that are most suitable for redevelopment. To accommodate the RHNA allocated 774 units and the 73 lower-income buffer units (buffer units), the City prepared an analysis and inventory of sites within City limits that are suitable for residential development during the planning period (Program 2, Adequate Sites). After calculating the City’s current capacity via the sites analysis, the City determined there was existing capacity to accommodate a total of 377 units (including lower-, moderate-, and above-moderate-income units). However, the City also determined that there exists a shortfall of 406 units for the lower-income RHNA category, plus the need to accommodate an additional 73 unit lower-income buffer, for a collective shortfall of 479 units.

To accommodate the remaining lower-income RHNA allocation, the City has identified potential sites to be made available to accommodate residential uses appropriate for lower-income households within three years and 120 days from the beginning of the proposed Housing Element’s eight-year planning period, which is referred to as the Adequate Sites Program.<sup>2</sup> As proposed in Program 2 of the HEU detailed below, the City will establish an “overlay” which is a regulatory planning tool that creates places special provisions or makes particular allowances over an existing base zoning district in order to guide development within a specific area. The Adequate Sites Program 2 overlay proposed as part of the HEU would encompass approximately a minimum of 20.3 acres of the potential sites identified in Figure 2.2-1 and would permit residential uses at a minimum of 20 dwelling units per acre within the General Commercial (CG) and Planned Development (PD) districts to accommodate the RHNA shortfall of 406 lower-income units. In accordance with current State housing law requirements, the sites would allow 100% residential use and require residential use to occupy at least 50% of the floor area in a mixed-use project.<sup>3</sup> Furthermore, through implementation of Program 18 of the HEU, and to further incentivize affordable housing in the City, the City will remove the discretionary requirements for multifamily housing in the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones, meeting the minimum requirements for a density bonus as detailed in Program 11. The City will review and amend the Manhattan Beach Municipal Code (MBMC) to permit residential uses in the CL, CD, and CNE zones without requiring approval of a use permit and all projects that utilize the State density bonus will be eligible for streamlined approvals. In addition to further discussion of the HEU programs themselves, the proceeding section(s) will also provide more detail in regards to the methodology by which realistic development capacity was determined and summarizes the approach utilized

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<sup>1</sup> The capacity to accommodate an additional “buffer” of approximately 15% of the total 487 lower-income RHNA allocation (approximately 73 units) is recommended by HCD to ensure sufficient capacity exists to accommodate the RHNA allocation throughout the eight year planning period and comply with the provisions of Senate Bill (SB-) 166 (2017). SB-166 requires a city, county, or city and county to ensure that its housing element inventory can accommodate its share of the regional housing need throughout the planning period.

for the identification of sites selected for rezoning (Section 2.3, RHNA Approach) The underutilization of existing sites, paired with programs identified in the HEU and outlined below will ensure that the City can realistically meet the RHNA targets at all income levels during the proposed Housing Element's eight-year planning period.

## 2.3 RHNA Approach

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. The development of the sites inventory started with the non-vacant sites that were identified by the City based on field work and onsite planning efforts (i.e., site visits, visual surveys, and on-the-ground analyses), staff knowledge of existing conditions, and development interests expressed by property owners and developers. Then a series of GIS analyses were conducted to identify additional vacant and non-vacant sites in the City within the land use categories that are zoned to allow for residential development (i.e., medium and high density residential zones and certain mixed-use commercial districts) identified by their land to improvement ratio, age of buildings, existing use, proximity to resources and existing infrastructure, and other data indicating possible constraints to development feasibility.

### 2.3.1 Vacant and Underutilized Sites

State law requires each jurisdiction to include a land inventory to identify specific sites that are suitable for residential development and to demonstrate that sufficient land is available to provide adequate housing capacity to meet the RHNA for each income level. As part of the sites analysis, the City and consulting team had to identify specific sites that are suitable for residential development to determine whether there are sufficient sites to accommodate the City's regional housing need in total and by income category. It was determined early in the analysis process that vacant sites within the City are nearly nonexistent, which was verified using the Tax Assessor land use codes. Local governments with limited vacant land resources may rely on non-vacant and underutilized residential sites to accommodate their RHNA. Although HCD's Housing Element Site Inventory Guidebook (Government Code Section 65583.2) states that a "nonvacant site's existing use is presumed to impede additional residential development," the City's opportunities for residential development depends on underutilized sites due to the lack of vacant land. Although some parcels identified have vacated uses, or are largely undeveloped, per HCD's definition of vacant sites, all sites identified are considered non-vacant. Determining which non-vacant sites are underutilized and have the strongest potential for redevelopment can help identify ideal areas for accommodating new housing through redevelopment. The methodology for identifying and prioritizing underutilized sites was largely based on the following factors:

- **Building Age** - Buildings more than 30 years old. Building age is also a major factor influencing property valuation and land value. The age of housing is often an indicator of housing conditions. In general, housing that is 30 years or older is considered an older building as it may begin to need costly repairs.
- **Undervalued** - An assessed improvement to land value ratio less than 1.<sup>3</sup> Improvement values less than 1 are an indicator for developers that the site has redevelopment potential as the assessed value of the land is greater than the assessed improvement value.

---

<sup>3</sup> Most counties, including the County of Los Angeles, tax their parcel owners based on the value of the land contained within the parcel boundaries, as well as the value of any improvements (e.g., buildings, parking lots, gardens, etc.) built upon that parcel. The ratio of the improvements' value to the land value is referred to as the improvement to land value ratio. For example, a parcel where the value of improvement (e.g., a single family residence) is equal to the land value, the improvement to land value ratio would be equal

- **Underbuilt** - Commercially zoned sites where the current floor area ratio (FAR) compared to the maximum allowable FAR is less than 100%. This indicator helps identify opportunity sites from a redevelopment perspective as the land is considered to be underbuilt.
- **Resource Access** - Within TCAC/HCD Opportunity Areas, defined by HCD and the California Tax Credit Allocation Committee (TCAC) as areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for lower-income households.
- **Local Knowledge** – City knowledge of property owner interest to sell or of developer interest to redevelop was utilized to identify non-vacant sites regardless of the factors listed above.

The sites identified as underutilized include a mix of underutilized uses such as parking lots, automotive repair shops, office spaces and restaurants with large surface car lots, and single-family residential lots zoned for commercial and allowing multifamily and mixed-use developments. The underutilized sites are not known to have been occupied in the past five years with lower-income housing and have existing access to water, sewer, and dry utilities. In addition, online mapping tools—including Google Earth, Google Maps, and Los Angeles County Office of the Assessor Property Assessment Information System—as well as City knowledge and field verification of the current projects under various stages of planning, review, and/or implementation, and development interest in certain areas of the City, were used to verify underutilized status and existing uses. Table 2.3-1, Underutilized Site Capacity, provides a summary of existing capacity units identified by income category.

Table 2.3-1. Underutilized Site Capacity

Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
24	158	19	201

Source: City of Manhattan Beach (2022)

## Zoning and Land Use Designations

The sites identified as having the existing capacity to accommodate the City’s 6th Cycle RHNA allocation are located within five existing zoning designations: Medium-Density Residential (RM) zone, in only Area District III; High Density Residential (RH) zone in all Area Districts (I-IV); and the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts. Figure 2.3-1, Area District Map, shows the location of the four Area Districts in the City, while Figure 2.3-2, Existing Zoning, provides a map of the City’s existing zoning.

The Planning and Zoning Code is the primary tool for implementing the General Plan, including as it applies to land use policy and applicable land use designations (City of Manhattan Beach 2003). As such, the RM, RH, CL, CD, and CNE zones must be consistent with the goals and policies outlined in their corresponding designations. The applicable General Plan designations and provisions are discussed in further detail in Section 3.11, Land Use and Planning.

## Lower-Income Sites Inventory

In accordance with Housing Element law (Government Code Section 65583.2[c][3]), the City’s default density for accommodating capacity for lower-income units (322 very low-income units and 165 low-income units) requires zoning that permits a minimum of 30 dwelling units (du) per acre, as the City is considered a metropolitan

to 1. If the improvements value is higher than the land value, the ratio is greater than one, while a ratio of less than one implies that the value of the land is less than the value of the improvements and would therefore be considered undervalued.

jurisdiction. The project identified five zones with the required minimum densities to accommodate lower-income housing: RM in Area District III, RH, CL, CD, and CNE in all Area Districts. Underutilized sites in the higher density zones were generally included in the sites analysis as lower-income sites.

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to demonstrate that the projected residential development capacity of the sites identified in the HEU can realistically be achieved. This realistic capacity may use established minimum densities to calculate the housing unit capacity or development trends. As a conservative estimate of capacity calculations, the sites analysis estimated realistic capacity is 20 dwelling units per acre. However, while the realistic capacity for lower-income sites is low compared to the maximum allowable densities in the five identified zones (32.3 to 51.2 dwelling units per acre), with high land values and limited vacant land available in the City, it is expected that property owners will strive for densities closer to the maximums.

Although the City has five zones which permit a minimum of 30 dwelling units, it is detailed under State guidance that sites that are too small or too large may not facilitate developments of this income level. Government Code Section 65583.2(c)(2)(A)(B) requires that sites identified for lower-income units be limited to 0.5 to 10 acres. The median parcel size within the five permissible zones is approximately 0.06 acres (City of Manhattan Beach 2022). Therefore, opportunities for identifying contiguous and underutilized parcels that can reasonably be expected to be consolidated as one site are limited. The sites analysis identified three sites that have the capacity to accommodate lower-income housing. All three sites were identified on parcels considered underutilized. Further, these sites are not considered to have an impediment to development, and their current uses are reasonably assumed to be discontinued through the proposed Housing Element's eight-year planning period (2021-2029). In addition to the identification of suitable underutilized parcels, the project has also incorporated pipeline projects<sup>4</sup> and projected Accessory Dwelling Unit (ADU) development into its analysis for all applicable RHNA categories, including lower-income categories. Ultimately, after calculating the City's current and projected capacity under existing conditions, it was determined that the City has the existing capacity to support 81 lower-income units, resulting in a deficit or shortfall of 406 units for the lower-income RHNA categories.

## Moderate-Income Sites Inventory

Sites inventoried at the moderate-income level were identified in the RM, RH, and commercially zoned districts permitting multifamily and mixed-uses (CL, CNE and CD). Twenty-four sites were identified within approximately 5.11-acres throughout the City. Although the minimum acreage criterion does not apply to these moderate-income sites, there were limited sites available when considering the underutilized methodology previously described. The general uses included commercial, retail, and some older residential uses. Most of the buildings were built before 1970. Some had uses that were recently vacated. In total, the land inventory of current and projected capacity accommodates 163 moderate-income units in areas zoned RM, RH, CL, CD, CNE and CNE-D5, which is enough to accommodate the City's 6th Cycle RHNA allocation for moderate-income units and a buffer to ensure capacity throughout the Housing Element's eight-year planning period (2021-2029).

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<sup>4</sup> The pipeline projects applicable to the lower-income RHNA categories are expected to receive Certificates of Occupancy with the eight year 6<sup>th</sup> Cycle planning period.

## Above Moderate-Income Sites Inventory

Sites with luxury units or above moderate-income units as planned for the residential development in the pipeline were identified as having the capacity to accommodate the majority of the above moderate-income sites. While most of the units are accounted for through pipeline development expected to be completed during the planning period, there were 11 additional sites, totaling 0.74 acres identified to accommodate the remaining above moderate-income units. The underutilized sites identified for the above moderate-income RHNA were identified in the RM, RH and commercially zoned districts permitting multifamily and mixed-uses (CD and CNE). The existing uses on the sites identified include office spaces, restaurants, and single-family residences located in older buildings, as well as parking lots and empty parcels.

In total, the sites inventory identified sufficient capacity to accommodate 133 above moderate-income units, which is enough to accommodate the City's 6<sup>th</sup> Cycle RHNA for above moderate-income units.

## Accessory Dwelling Units

The HEU may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) to be developed within the planning period. The number of ADUs and JADUs that can be credited toward potential development must be based on the following factors:

- ADU and JADU development trends since January 2018
- Community need and demand for ADUs and JADUs
- Resources and incentives available to encourage their development
- The availability of ADUs and JADUs for occupancy
- The anticipated affordability of ADUs and JADUs

Recent changes to legislation governing the development and provision of ADUs and JADUs have sparked growth in these types of units in cities across California, including Manhattan Beach. While only three ADUs were permitted and constructed in the City between 2017 and 2019, the City has more recently issued 11 permits for the construction of these units from January 2020 to October 2021, with 22 additional ADU permit applications currently under review. Because ADU and JADU legislation has been revised several times since 2017, providing increased opportunities for the development of housing, it is expected that development trends will continue in an upward trajectory. Based on SCAG projections, of the total 83 ADUs that are projected to be built during the planning period, 14 are estimated to be affordable to very-low-income households, 36 to low-income households, five to moderate-income households, and 28 to above moderate-income households.

## Current Development

Two development projects in the pipeline are seeking entitlements, or have prospective development expected to be built within the planning period. One of the projects is a multifamily residential project, and the other is a mixed-use project, both of which will be redevelopment projects on non-vacant parcels.



The Verandas Project is located at 401 Rosecrans Avenue and 3770 Highland Avenue and consists of 73 above moderate multifamily units and six very low-income units on two abutting parcels with a total acreage of 1.02 acres and a density of approximately 77.8 units per acre.

The 1701-1707 Artesia is mixed-use project consisting of 649 square feet of commercial space and 14 units, including one very low-income unit. The site is approximately 0.3 acres and developed at a density of approximately 46.6 units per acre.

In total, 93 units are part of planned, approved, or prospective projects expected to be built within the planning period, that are counted toward meeting the City’s 6<sup>th</sup> Cycle RHNA allocation. Based on affordability restrictions, the projects are anticipated to provide a total of seven lower-income units, and 86 above moderate-income units. There are several other projects in the City with residential dwelling units, such as single-unit developments, that have not been included in this sites analysis which are expected to be completed during the planning period.

### Summary of Capacity to Accommodate RHNA

Based on the inventory of available sites, underutilized sites, the potential for ADUs and JADUs, and existing, planned, proposed, or in progress development projects, Table 2.3-2 presents the total RHNA compared to credits and capacity identified through the preparation of the HEU.

**Table 2.3-2. Total RHNA Compared to Credits and Capacity Identified**

Category	Total Units	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units
<b>RHNA</b>	<b>774</b>	<b>487</b>	<b>155</b>	<b>132</b>
Underutilized Site Capacity (No New Units)	201	24	158	19
Vacant Site Capacity	0	0	0	0
Pipeline Residential Development Credited Toward RHNA	93	7	0	86
Projected Accessory Dwelling Units	83	50	5	28
<b>Totals</b>	<b>377</b>	<b>81</b>	<b>163</b>	<b>133</b>
<b>Capacity Deficit (-)/ Surplus (+)</b>	<b>—</b>	<b>- 406</b>	<b>+8</b>	<b>+1</b>

Source: City of Manhattan Beach (2022)

As shown in Table 2.3-2, the City has a deficit or shortfall of 406 units for the lower-income RHNA category. To accommodate the remaining lower-income RHNA-allocated units, the City has identified potential sites in the General Commercial (CG) and Planned Development (PD) Zoning Districts that could be made available to accommodate residential uses appropriate for lower-income households within three years and 120 days from the beginning of the planning period (October 15, 2021). Through implementation of Program 2 of the HEU (discussed in Section 2.4 Housing Plan, of this ND), the City will establish an overlay, within the required timeframe, that encompasses a minimum of 20.3 acres of these sites to accommodate the shortfall of lower-income units. In addition, the City will also rezone and identify sites within the overlay (approximately 3.65 acres total) to

accommodate a buffer of at least 15% (approximately 73 lower-income units) as recommended by HCD to ensure sufficient capacity exists to accommodate the RHNA throughout the planning period.

## 2.4 Housing Plan

As required by State Housing Element law, the HEU includes a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA allocation. The goals, objectives, policies, and implementing programs of the Housing Plan emphasize: methods of encouraging and assisting in the development of new housing for all income levels; providing and maintaining adequate capacity to meet the housing need; removing government constraints to development, where feasible and legally possible; conserving and improving existing housing; providing increased opportunities for home ownership; reducing impediments to fair housing choice; and monitoring and preserving units at risk of converting from affordable to market rate. The Housing Plan also includes numerous policies to better guide decisions and achieve desired outcomes related to the development, improvement, preservation, and maintenance of housing.

The following is a summary of the key programs that would be included in the City's proposed HEU. Many of these are a continuation or modification of programs from the previous 2013–2021 Housing Element.

### Program 1: Accessory Dwelling Units

Accessory dwelling units (ADUs) help meet the City's housing needs for all income levels and provide a housing resource for older adults, students, and extremely low-, very low-, low- and moderate-income households. After passage of State ADU laws effective January 1, 2017, and January 1, 2020, the City applied State standards in evaluating ministerial applications for ADUs and has adopted ordinances consistent with State law. The City will continue to apply regulations from Chapter 10 of the MBMC, known as the Planning and Zoning Code, that allow accessory units by right in all residential or mixed-use zoning districts (zones) in accordance with State law.

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of ADUs and JADUs to be developed within the RHNA projection period. The full analysis in Appendix E, Sites Analysis and Inventory, used the trends in ADU construction since January 2018 to estimate new production; however, this only accounts for the effect of new laws without taking into account the local program the City will adopt to incentivize and promote the creation of ADUs, and the recent ADU Ordinance adopted in January 2021. Based on the local incentives, ADU and JADU trends since January 2018, recent sharp upward trends in 2021, and permits currently under City review, a conservative estimate of the number of units to be produced under this approach is an average of 10 ADUs each year during the projection period (see Appendix E of the HEU for the full Accessory Dwelling Unit Projection analysis).

The Community Development Department reviews and approves ADU entitlements and tracks the timely review of ADU applications and building permits issued. The Community Development Department collects data annually on planning entitlements and building permits for ADUs for the Housing Element Annual Progress Report, and will continue to do so per the ADU projection assumptions in the Sites Inventory (see Program 19, No Net Loss, for objectives and timelines tied to ADU monitoring).

Under Assembly Bill (AB) 671 (2019), local agencies must include a plan in their Housing Element to incentive and promote the creation of ADUs that can be offered at affordable rent for very low-, low-, or moderate-income households. As such, a primary objective of this Accessory Dwelling Unit Program is to promote the development of housing units

for lower-income persons or households. To comply with AB 671 and support the goal of permitting an average of 10 ADUs annually, including ADUs affordable to extremely low-, very low-, low-, and moderate-income households, the Community Development Department will develop tools to streamline the approval process and market ADU construction. These public engagement and information tools may include information packets on the entitlement process, a dedicated web page including a step-by-step guide of the entitlement process, preparation of Frequently Asked Questions (FAQs) for distribution at the planning counter or community meetings, and other engagement tools.

As part of Program 19, No Net Loss, the City will review the ADU trends to date at the planning cycle mid-point (by November 2025), and determine if the City is on track to achieve the annual average goal of 10 building permits issued for ADUs. If the City is not on track and there is not an appropriate buffer of sites to make up for the difference as fully explained in Program 19, the Community Development Department will further review and develop additional incentives and review and reallocate existing staffing resources as needed to achieve its goal. Additional incentives may include direct outreach mailings to property owners, technical assistance, and financial assistance.

## **Program 2: Adequate Sites**

As fully analyzed in the sites analysis, the City has a remaining lower-income RHNA of 406 units for project's eight-year planning period. The City will establish an overlay district that encompasses a minimum of 20.3 acres of sites in the General Commercial (CG) and Planned Development (PD) districts to accommodate the remaining lower-income RHNA of 406 units. The acreage needed is assumed using a realistic capacity of 20 dwelling units per acre, based on the minimum density requirements outlined below.

Pursuant to State law, the overlay district's standards adopted as part of the Adequate Sites Program to address the RHNA shortfall will adhere to the following components of Government Code sections 65583.2(h) and (i):

- Sites must accommodate 100% of the shortfall for very low- and low-income units.
- Sites must allow a minimum of 16 units per site.
- Sites must permit a minimum of 20 dwelling units per acre.
- Sites must allow 100% residential use and require residential use to occupy at least 50% of the floor area in a mixed-use project.
- Sites must permit owner-occupied and rental multifamily uses by right pursuant to Government Code Section 65583.2(i) for developments in which 20% or more of the units are affordable to lower-income households.

The allowable densities for residential redevelopment in the overlay district will range from a minimum density of 20 dwelling units per acre, consistent with State law, to a maximum density of at least 30 dwelling units per acre. The City will ensure that the development standards that result from the planning process will be carefully crafted such that they will not prevent or prohibit the provision to facilitate development at the maximum densities allowed under the overlay. Any residential development standards in the overlay district will not preclude the minimum densities or requirements of State law outlined above, creating the opportunity for several hundred residential units on sites that previously only permitted commercial uses. As reflected in the sites analysis, each site identified as a potential site for the Adequate Sites Program's overlay has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.

In addition, the City commits to rezoning an additional 3.65 acres of sites to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. The City will ensure that the sites are rezoned at densities deemed appropriate to accommodate housing for lower-income households as defined by Government Code Section 65583.2(c)(3)(B). This will provide a buffer of at least 73 units of multifamily housing.

### **Program 3: Affordable Housing Streamlining**

The City currently allows concurrent processing of all discretionary applications for a project, thereby streamlining the development process. The City will continue to offer concurrent processing of all discretionary applications for a project and inform developers of the opportunity for concurrent processing. The City has a streamlining process in place specifically for multifamily housing in residential zones. Multifamily housing developments in residential zones (Medium-Density Residential District [RM], High-Density Residential District [RH], and Residential Planned Development District [RPD]) with fewer than six units are permitted by-right. Projects with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan approved by the Director.

To further assist in the development of housing for extremely low-, very low-, low-, and moderate-income households, the City provides an affordable housing streamlined approval process in accordance with State requirements for qualifying development proposals that provide affordable units under SB 35 streamlining. The City annually reports on affordable housing streamlining applications in the Housing Element Annual Progress Report. The City will revise internal permitting procedures to ensure that staff has clear procedures for responding to proposals for SB 35 streamlining and for prioritizing qualifying SB 35 housing developments consistent with State law.

### **Program 4: Affordable Senior Housing Preservation**

This program is concerned with ensuring that the current affordability of the Manhattan Village Senior Villas project, located at 1300 Park View Avenue, is being maintained. While the project's affordability agreement with the City does not expire and the components of affordability are preserved via a deed restriction that runs with the land, the City should make contact with the owners of the Manhattan Village Senior Villas and continue to monitor and enforce affordability throughout the planning period. In addition, the City should identify qualified affordable housing developers and local non-profits as potential purchasers/managers of affordable units as a proactive measure.

### **Program 5: Americans with Disability Act (ADA) Improvements Program**

The City will ensure the Manhattan Village Senior Villas ADA Pathway Project is completed by 2022 to increase accessibility for older adults and people with disabilities in the City. Following completion of the Senior Villas ADA Pathway Project, the City will utilize future CDBG funds for additional ADA-improvements focused on bringing existing, non-compliant ramps into ADA-compliance at various locations throughout the City, as identified by the Public Works Department. These improvements will increase accessibility for people with disabilities throughout the City.

### **Program 6: Annual Progress Reports**

The City will continue to report annually on the City's progress toward its eight-year RHNA housing production targets and toward the implementation of the programs identified in the Housing Element. Further, the City will identify and prioritize State and local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports (AB 1255, 2019; AB 1486, 2019; AB 879, 2017).

### **Program 7: By-Right Development**

The City will allow developments by-right pursuant to Government Code section 65583.2(i) when 20% or more of the units are affordable to lower-income households on sites identified in the sites analysis to accommodate the lower-income RHNA allocations that were previously identified in past housing elements in accordance with the specifications of Government Code Section 65583.2(c) and Housing Element law.

### **Program 8: Code Compliance**

The City will continue to ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources.

### **Program 9: Countywide Affordable Home Ownership Program**

The Home Ownership Program (HOP) is administered by the Los Angeles County Development Authority (LACDA). This program provides funding to lower-income households looking to purchase a home through down payment and closing costs assistance for single-family homes, condominiums, and townhomes. The HOP loan provides a second mortgage loan for first-time homebuyers with an assistance amount of up to \$85,000, or 20 percent of the purchase prices, whichever is less, and offers 0 percent interest loans. Participant's income must not exceed 80 percent of the County Median Income based on the number of persons in the household. Properties must be located in cities participating in the HOP, which includes Manhattan Beach. The City will advertise program availability on the City's website and at the planning counter.

### **Program 10: Countywide Affordable Rental Housing Development**

This program is administered by the Los Angeles County Development Authority (LACDA). This program provides financial assistance to developments located in cities participating in the Los Angeles Urban County Program, including the City of Manhattan Beach. This program supports new construction and acquisition/rehabilitation projects that create new Special Needs and affordable rental housing units, and the creation of permanent Special Needs housing units in projects throughout the County of Los Angeles.

Projects funded through this program are expected to help combat homelessness, meet the housing needs of their communities, provide local economic development opportunities during construction, and assist in the alleviation of any local blighting conditions. This program provides financial and technical assistance to acquire sites, develop affordable rental housing, and acquire and rehabilitate affordable rental housing. Technical assistance and funding for pre-development activities may also be provided for nonprofit housing developers participating in specific projects. The funds are made available as low-interest long term loans. Funds for the program are administered

through a Notice of Funding Availability (NOFA) issued by LACDA. All units developed utilizing these resources are made available to households earning less than 50% of the median area income.

The City will advertise the availability of this additional source of funds to support in the development of rental housing. Program availability will be advertised on the City's website and at the planning counter.

Further, the City will increase coordination and collaboration with the LACDA to promote Manhattan Beach as a City that supports affordable housing development and as an ideal candidate for the allocation of funding for affordable housing.

### **Program 11: Density Bonus**

Government Code Section 65915 requires that a jurisdiction adopt a local Density Bonus Ordinance consistent with State law. To satisfy this requirement, the City will review and amend the local Density Bonus Program Ordinance to ensure consistency with State requirements, including the provision of a bonus for student affordable housing, senior housing, and permitting up to an 80% bonus for 100% affordable developments (as provided in Appendix C, Constraints and Zoning Analysis, of the HEU).

### **Program 12: Developer Outreach and Transparency**

The City will actively work with the development community to identify ways that lower-income housing may be provided, including housing for extremely low-income households and those with special housing needs. The City will educate developers as to how density bonus regulations and lot consolidation incentives could be used to facilitate the development of affordable housing, including those for extremely low-income, very low-income, and low-income households. Another outreach effort will inform the development community and property owners as to development opportunities for accessory dwelling units.

The City will maintain current information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all Planning and Zoning Ordinances, development standards, and annual fee reports or other relevant financial reports, consistent with the requirements of AB 1483 (2019).

### **Program 13: Energy Conservation and Energy Efficiency Opportunities**

Under the City's adopted Environmental Work Plan priorities, adopted Strategic Plan goals, and in compliance with State and General Plan mandates, the City is creating a Climate Resiliency Program, called Climate Ready Manhattan Beach (Climate Ready MB). The Climate Ready MB program includes completing a Sea Level Rise Vulnerability Assessment; creating a Climate Action and Adaptation Plan; and updating the City's Local Coastal Program-Land Use Plan, Local Hazard Mitigation Plan, and General Plan.

In addition, the City has adopted the 2019 California Green Building Standards Code which includes energy efficiency, water efficiency and conservation, and material conservation and resource efficiency standards to encourage sustainable development and reduce residential and nonresidential building energy use. The City anticipates State Green Building Codes being updated in the next two years, at which point the City will also update City regulations as detailed in Program 31.

### **Program 14: Fair/Equal Housing Program**

Government Code Section 65580 asserts that the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian is a priority of the highest order. Governments and private sectors should work cooperatively to expand housing opportunities and accommodate housing needs in California. Furthermore, designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the State's housing goals. As such, Program 14, Fair/Equal Housing Program is designed to promote equal housing opportunities in Manhattan Beach. The City recognizes the effect that discrimination has in limiting housing choice and equal opportunity in renting, selling, and financing housing. In accordance with Government Code Section 8899.50 (b)(1), the City administers its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and takes no action that is materially inconsistent with its obligation to affirmatively further fair housing. The City contracts with the Housing Rights Center (HRC), a nonprofit organization that helps educate the public about fair housing laws and to investigate reported cases of housing discrimination. HRC provides free services including landlord tenant counseling, outreach and education, and discrimination investigations. The City offers fair housing information and referrals upon request. The City will continue referral services and contracting fair housing services with HRC and will work to provide this information as well as providing links to additional fair housing resources on the City website. In addition, the City will take steps to affirmatively further fair housing during the planning period. Other additional steps the City will take to further fair housing efforts during the planning period include: supporting and participating in the Regional Analysis of Impediments to Fair Housing Choice; promoting compliance with housing discrimination law by developing informational fliers for developers; and developing a process that prompts the consideration of fair housing in the planning decision process.

### **Program 15: Housing Choice Voucher Program**

An important element of the City's strategy in providing housing opportunities for extremely low-income and low-income households is the Section 8 Housing Choice Voucher Program, a program offering tenant-based assistance subsidized by the Federal government for very low-income families, seniors, and persons with disabilities. The Los Angeles County Development Authority subsidizes the balance of the monthly rent in direct payments to the owner through funding received by the U.S. Department of Housing and Urban Development. The City will continue to participate in LACDA program, coordinate with the Redondo Beach Housing Authority and publicize availability of Section 8 rental assistance for households in the City by enhancing the City's website with information.

### **Program 16: Lot Consolidation Incentive**

The City already provides an additional density bonus incentive under Section 10.12.030 of the Municipal Code above and beyond what is permitted under State law for multifamily residential developments meeting the minimum requirements for a density bonus. In accordance with MBMC Section 10.12.030, multifamily developments meeting the minimum requirements are currently granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.50 acres to 0.99 acres through the existing lot consolidation bonus incentive. However, to specifically incentivize affordable housing, including housing for extremely low- and very low-income households, reach the City's housing target for the 6th Cycle planning period, and incentivize small lot development, the City will expand the current lot consolidation

incentive for sites that have been identified via Program 2, Adequate Sites.<sup>5</sup> Sites identified in the “Sites Inventory” will be granted a 5 percent base density increase when two or more parcels are consolidated into a single building site for a combined parcel size between 0.30 acres to 0.49 acres. In addition, The City will continue to facilitate consolidation and development of small parcels. These facilitation measures will include but are not limited to: creating increased publicity and awareness; providing assistance to affordable housing developers in identifying potential opportunities for lot consolidation; and expediting processing and waiving fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.

### **Program 17: Manufactured Housing**

State law requires that the City’s Planning and Zoning Code permit manufactured housing in the same manner and in the same zone(s) as conventional single-family dwellings in zones that permit single-family dwellings (Government Code Section 65852.3). To comply with State law, the City will amend the Planning and Zoning Ordinance to clarify that manufactured housing is treated as a single-family dwelling and is permitted in all of the same zones and same manner as other single-family structures, including in commercial or mixed-use zones.

State law also requires that cities and counties allow mobile home parks (including condominium and cooperative parks) on all land planned and zoned for residential land use; provided, however, that a use permit may be required (Government Code Section 65852.7). To comply with State law, the City will amend the Municipal Code to permit mobile home parks on all land zoned or planned for residential land uses. In addition, the City will enforce mobile home park replacement and relocation requirements in accordance with State law (Government Code Section 65863.7).

### **Program 18: Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts.**

Multifamily housing developments in the CL, CD, and CNE districts are currently permitted through approval of a conditional use permit. To further incentivize affordable housing in the City, the City will remove the discretionary requirements for multifamily housing in the CL, CD, and CNE zones meeting the minimum requirements for a density bonus. The City will review and amend the Municipal Code to permit residential uses in the CL, CD, and CNE zones without requiring approval of a use permit and all projects that utilize the State density bonus will be eligible for streamlined approvals.

In addition, under Chapter 10.16, Commercial Districts, of the MBMC, portions of a building intended for residential use in a mixed-use project or purely residential developments in mixed-use zones are currently subject to the High-Density Residential District residential standards in Chapter 10.12, Residential Districts, of the MBMC. To minimize constraints to the development of affordable housing, including housing for extremely low- and very low-income households, the City will adopt development standards for multifamily residential and mixed-use projects in the three commercial mixed-use zones (CL, CD, and CNE) instead of deferring to the High-Density Residential standards, which are subject to voter approval for certain amendments to residential development standards.<sup>6</sup> The City will ensure that the adopted standards for

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<sup>5</sup> Specific parcel details for sites included in the expansion of the current lot consolidation incentive program can be found within Tables 7, 8, 9, 15, and 16 of Appendix E, Sites Analysis and Inventory, of the HEU.

<sup>6</sup> In accordance with Section 10.12.0030, Property development regulations: RS, RM, and RH district, the property development standards for the residential zoning districts, RS, RM and RH, shall not be amended to increase the standards for maximum height of structures or maximum buildable floor area, or to reduce the standards for minimum setbacks, minimum lot dimensions or



residential and mixed-use projects do not reduce the intensity of land use<sup>7</sup> or reduce the site's residential development capacity, consistent with the Housing Crisis Act of 2019. Through this process, the City will implement Program 20, Objective Design Standards, through the development of objective design standards.

### **Program 19: No Net Loss**

The City will utilize their development permit database to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements as required under SB 166 (2017). The City will develop and implement a monitoring procedure pursuant to Government Code Section 65863 and will make the findings required by that code section if a site is proposed for development with fewer units or at a different income level than shown in the proposed Housing Element.

As part of Program 2, Adequate Sites, the City will rezone to provide an additional buffer of approximately 15 percent more capacity than required for lower-income sites, as recommended by HCD. This will ensure that sufficient capacity exists within the City to accommodate the RHNA throughout the planning period; however, if at any time during the planning period, a development project results in fewer units by income category than identified in the sites analysis for that parcel and the City cannot find that the remaining sites in the HEU are adequate to accommodate the remaining RHNA by income level, the City will within 180 days identify and make available additional adequate sites to accommodate the remaining RHNA. Further, as outlined in Program 1, Accessory Dwelling Units, the City will check the annual ADU trends at the planning cycle mid-point (October 15, 2025). If the City finds that the ADU production does not keep pace with the ADU assumptions toward the RHNA, and that there is not an appropriate buffer of sites remaining to account for the deficit of projected lower- or moderate-income ADUs, the City will identify additional sites within six months. If the City finds that the ADU production does not keep pace with the ADU assumptions, the City will also review and streamline permitting procedures and review and reallocate existing staffing resources as needed to achieve its goal (see Program 1, Accessory Dwelling Units, above for further details).

### **Program 20: Objective Design Standards**

The City will increase transparency and certainty in the development process through objective design standards. Any new design standards developed and imposed by the City shall be objective without involvement of personal or subjective judgement by a public official and shall be uniformly verifiable by reference to the City's regulations in accordance with the requirements of the Housing Crisis Act of 2019 (SB 330, 2019) and related State housing law.

### **Program 21: Older Adults Programs**

The City provides various services for the special needs of older adults so that they may remain in the community. The older adults of the community regularly rely on these resources for services and programming. The Older Adults

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minimum lot area per dwelling unit, unless the amendment is first submitted to a city-wide election and approved by a majority of the voters.

<sup>7</sup> In accordance with State law, "reducing the intensity of land use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce the site's residential development capacity.

Program provides services to predominantly lower-income older adults, including those with extremely low-incomes, and provides some services for residents with disabilities (all ages).

This program is operated by a part-time Older Adults Program Manager who is contracted through the Beach Cities Health District and the City of Manhattan Beach Fire Department. At any given time, the Older Adults Program may assist up to 100 older adults, of whom 70 percent are lower income. Other existing City services falling under the purview of Program 23 include: providing funds for social service groups serving older adults, including the Salvation Army's Brown Bag Food Program, Care Management for Manhattan Beach Seniors, and South Bay Adult Care Center; providing temporary technical assistance to older adults by helping older adults with changes resulting from the Clean Power Alliance program; and to continue supporting the City's Parks and Recreations Department's older adults programs such as softball leagues drama, poetry, and fitness classes.

Finally, the City recently approved an assisted living project for older adults in 2021, consisting of 95 rooms (115 total beds), a facility kitchen, and common areas (foyer, parlor, bistro, private dining room, general dining rooms, activity rooms, and staff rooms). The project will include 64 assisted living rooms and 31 memory care rooms for Alzheimer's patients and individuals with memory loss. The project is expected to be completed and increase assisted living opportunities for older adults in the City during the 6th Cycle planning period.

### **Program 22: Parking Reductions**

Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing for vulnerable populations. The City will make Municipal Code revisions to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development (AB 1851).

The City currently provides reduced parking requirements consistent with AB 2345 (2020) for housing developments that qualify for a density bonus pursuant to State density bonus law. To identify opportunities for additional parking reductions for residential multifamily housing, the City will complete a parking study for sites that are zoned to allow residential development outside of the Coastal Zone. This may include, but not be limited to, reduced parking minimums for studio and 1-bedroom multifamily units, reduced parking requirements for residential uses in areas that are walking distance from resources and amenities, flexibility in parking requirements for affordable and mixed-income developments, as well as reductions in exchange for public amenities.

### **Program 23: Preserving Housing Capacity**

Section 10.12.030 of the MBMC establishes standards to avoid "mansionization." These provisions act to discourage construction of overly large dwellings that are out of scale with the surrounding neighborhood. These provisions include increased setback and open space requirements for new single-family residences. In addition to issues of scale, the large dwellings are also more costly, and lead to increased pressure to demolish modest dwellings in favor of lavish structures affordable only to the most affluent. In an effort to incentivize multifamily housing while continuing to disincentivize "mansionization," the City provides an exception for minimum and maximum lot sizes for multifamily housing with three (3) or more dwelling units in accordance with Section 10.12.030.k of the MBMC. The City also provides an exception to a lot merger of parcels for existing religious assembly and public or private school uses, when the site is used as a single building site under Section 11.32.090 of the MBMC.

The maximization of lot standards helps prevent consolidation of lots for the purpose of developing large, single dwelling unit. However, under Section 10.52.050.F of the MBMC, property owners in residential zones may develop contiguous separate lots as one site without requiring a lot merger, with only detached accessory structure(s) on one or more of the lots, which includes guest houses (including ADUs and JADUs), garages and parking areas, and pools. For development standards, with the exception of the parking calculation, the lots are treated as separate. This presents property owners with the opportunity to buy adjacent lots with existing unit(s) for the purpose of demolishing the unit(s) and developing only detached accessory structure(s), ultimately reducing the City's overall housing stock.

To mitigate the loss of dwelling units through demolition and to conserve the existing housing stock, the City will amend the Municipal Code to eliminate provision 10.52.050.F from the Municipal Code such that all parcels operating as one site will need to be consolidated and therefore be subject to existing maximum lot size requirements. Further, while the City incentivizes lot consolidation for multifamily residential developments (Program 16, Lot Consolidation Incentive), the City will refrain from approving any merger that would result in a net loss in residential capacity and conflict with the no net loss provisions of SB 330 (Program 26 Replacement Requirements).

#### **Program 24: Priority Services**

The City will internally coordinate with the Public Works Department for review and consideration when reviewing new residential projects. The City's current Urban Water Management Plan acknowledges the requirements and includes the projected water use for single-family and multifamily housing needed for lower-income households. The Community Development Department will coordinate with Public Works to ensure that proposed developments which include housing affordable to lower-income households, including extremely low- and very-low income, are prioritized for the provision of water and sewer services. Internal coordination will further support the prioritization of water and sewer services for future residential development, including units affordable to lower-income households.

#### **Program 25: Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities**

In an effort to proactively remove ambiguities that may impose extra hurdles for people with disabilities, the City will amend its reasonable accommodation procedures (Chapter 10.85 of the Municipal Code) to remove discretionary referrals to the Planning Commission and the requests shall be reviewed and may be granted solely by the Community Development Director. In addition, the City will develop materials and outreach methods to increase public awareness and ease of access to policies, programs and processes addressing reasonable accommodation.

#### **Program 26: Replacement Requirements**

The City will mandate replacement requirements pursuant to the requirements as set forth in Government Code Section 65915, subdivision (c)(3) on sites identified in the Sites Inventory (see the Electronic Housing Element Site Inventory Form included as **Exhibit A** of Appendix E, Sites Analysis and Inventory, of the HEU) and consistent with the Housing Crisis Act of 2019 and related state housing law for proposed housing developments on sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels

affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households.

### **Program 27: Solar Panel Incentives**

Solar panels may be used on roofs of residential and commercial structures to generate electricity that is either transmitted to the grid or stored in batteries on-site. The existing height limits in Manhattan Beach ensure rooftop solar units would not eventually be subject to shade and shadow, which would render them ineffective. To successfully promote the use of alternate energy, the City has subsidized permitting fees for solar panels since 2008. The current permit fee for solar panels is \$100.00. The City's fee incentives resulted in 800 solar permits issued during the 5th Cycle Planning Period. The City will continue to promote and incentivize alternate energy through permit subsidies for solar panels.

### **Program 28: Specialized Housing Types to Assist Persons with Special Needs**

#### **Employee Housing**

If the City's Planning and Zoning Code is ever amended to add a zoning district that permits agricultural uses, the City will make corresponding municipal code amendments related to agricultural workers and current employee housing requirements consistent with the State Employee Housing Act (Section 17000 et seq. of the Health and Safety Code) to assist in the production of this special housing type to serve lower-income households, including extremely low-income households.

#### **Emergency Shelters**

Emergency shelters serve those experiencing homelessness, including extremely low-income households and those with special housing needs. The City will amend the MBMC to ensure that parking requirements for emergency shelters accommodate the staff working in the shelter and do not require more parking than other residential or commercial uses within the same zone (AB 139, 2019).

#### **Supportive Housing**

State law provisions have recently been modified to require approval of supportive housing that meets the specified requirements of State law as a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses (AB 2162). Additionally, no minimum parking may be required for units occupied by supportive housing residents if the development is located within 0.5 miles of a public transit stop (Government Code Section 65915). The City will amend the MBMC to comply with current State law. This amendment will provide additional housing opportunities for lower-income households, including extremely low-income housing and those with special housing needs.

#### **Low-Barrier Navigation Centers**

Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The MBMC does not currently define Low Barrier Navigation Centers; therefore, it also does not identify zoning districts in which this use is permitted. As such, the City will amend the MBMC to permit the development of Low Barrier Navigation Centers

that meets the requirements of State law as a use by-right, without requiring a discretionary action, in mixed-use and non-residential zones that permit multifamily uses (AB 101). This use will increase opportunities to serve those experiencing homelessness, including extremely low-income households and those with special housing needs.

### Residential Care Facilities

Residential Care Facilities serving seven or more persons, referred to as Residential Care, General in the MBMC, is classified as a public and semipublic use under Section 10.08.040 - Public and Semipublic Use Classifications of the MBMC. As such, these facilities are conditionally permitted uses requiring a Use Permit in the PS (Public and Semi-Public) zone. Further, the City facilitates additional opportunities for development of Residential Care, General by permitting these facilities in two additional zoning categories (residential and commercial), including the RH, RPD, RSC, and CG, subject to a Use Permit.

Due to the complexity associated with Residential Care Facilities, the necessary infrastructure, and requirements tied to state licensing, opportunities to remove the discretionary permit are limited. However, under this program, the City will mitigate any constraints that may be posed by a Use Permit for Residential Care Facilities by making the approval process more predictable and transparent. Currently, Residential Care, General facilities are subject to the broader findings for all Use Permits outlined in Section 10.84.060 - Required Findings, of the MBMC. The City will amend the Zoning Code to include findings specific to Use Permits for Residential Care, General (serving seven or more persons) facilities. The City will ensure the findings are objective and improve certainty in the development approval process to better facilitate the production of Residential Care Facilities to serve the needs of the community.

### Program 29: Support for Those Experiencing Homelessness

Under this program, the City will continue to implement the policies and actions of its Five-Year Plan to Address Homelessness in Our Community to continue addressing the needs of its residents experiencing homelessness for affordable housing and housing navigation services. The City will also continue regional coordination in partnership with the Cities of Redondo Beach and Hermosa Beach and seek additional funding sources with the South Bay Beach Cities for continued homeless services. Further, the City will continue to educate the community on various resources in the South Bay and ensure the resource guide for those experiencing homelessness is kept up to date and available on the City's website.

### Program 30: Surplus Lands

The City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports in accordance with the requirements of AB 1486 (2019). If the City identifies any public land that they intend to declare as surplus land at any point, the City will send notices about available, surplus local public land to HCD, local public entities within the jurisdiction where the surplus local land is located, and any developers who have notified HCD of their interest in developing affordable housing on surplus local public land in accordance with the requirements set forth in the Surplus Land Act (Government Code Section 54220-54234).

## Program 31: Water Conservation and Green Building Standards

Section 7.44.020 of the MBMC addresses water conservation and provides for permanent water conservation measures and drought restrictions. In addition, water conservation requirements apply to 100% of projects that the City approves. Water conservation requirements are built into Title 9, via the Green Building Code, and Title 10 via State MWELo requirements.

The City has adopted the 2019 California Green Building Standards Code, and additionally requires the following measures:

- Insulating hot water pipes to minimize energy loss.
- Using caulk and insulation that are formaldehyde-free or contain low VOC (volatile organic compounds).
- Pre-plumb water piping and sensor wiring to the roof for future solar water heating.
- Use duct mastic on all duct joints and seams to minimize energy loss.
- Install "Energy Star" bath fans vented to the outside.
- Energy efficient water fixtures.

The City anticipates State Green Building Codes being updated in the next two years, at which point the City will also update City regulations.

## 2.5 Scope of Analysis

The project being evaluated within this document is the HEU, which is a policy document that conceptualizes how the City will provide the capacity for a total of 774 housing units, as assigned by SCAG during the 6th Cycle RNHA, during the period of 2021 through 2029. Under existing conditions, the City has the capacity to accommodate 377 dwelling units; as such, the City is required to identify how it will provide the capacity for an additional 479 dwelling units (406 units plus an additional buffer of 73 units). The HEU includes programs that conceptualize how the City will ultimately provide the capacity for these additional 479 dwelling units.

No development is currently proposed under the HEU; however, implementation of the HEU is designed to facilitate construction of 774 new units throughout the City. Additionally, the HEU includes programs that support the existing and future residents of the City, including future rezoning (Program 2). Given the developed and built out nature of the City, new housing units constructed throughout the City may ultimately qualify for one or more categorical exemptions under CEQA (such as Class 3, Small Structures or Class 32, Infill Development Project), exemption under CEQA, consistent with State CEQA Guidelines Section 15332, or for CEQA Streamlining and with State laws to promote the development of infill affordable housing (Programs 7, 11 and 18). As appropriate the below analysis addresses the potential physical impacts associated with implementation of the HEU.

## 2.6 References

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2022. 6th Cycle Housing Element Update (HEU). Accessed January 5, 2022.

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### 3 Initial Study Checklist

**1. Project title:**

City of Manhattan Beach General Plan Amendment: 6<sup>th</sup> Cycle Housing Element Update

**2. Lead agency name and address:**

City of Manhattan Beach  
1400 Highland Avenue  
Manhattan Beach, California 90266

**3. Contact person and phone number:**

Talyn Mirzakhonian, Planning Manager  
310.802.5510

**4. Project location:**

Citywide

**5. Project sponsor's name and address:**

City of Manhattan Beach  
1400 Highland Avenue  
Manhattan Beach, California 90266

**6. General plan designation:**

Not applicable for adoption of a Housing Element Update

**7. Zoning:**

Not applicable for adoption of a Housing Element Update

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

The purpose of the HEU is to provide an update to the Housing Element of the City's General Plan. The HEU involves an amendment to the General Plan in order to adopt, as required by State Law, an updated Housing Element. The intent of the HEU is to address the comprehensive housing needs of the City. State law requires jurisdictions to update their Housing Elements every eight years to outline their existing and projected housing needs, to discuss barriers to providing that housing, and to propose actions to address housing needs and barriers. The programs proposed in the HEU are intended to be implemented over an eight-year planning horizon (2021-2029). See Section 2 for a detailed project description.

**9. Surrounding land uses and setting (Briefly describe the project's surroundings):**

The City of Manhattan Beach (City) is located in the southwest portion of Los Angeles County (County) along the Pacific Ocean, approximately 19 miles southwest of Downtown Los Angeles. The City is bordered by the City of El Segundo and the Chevron Oil Refinery to the north, the cities of Redondo Beach and Hawthorne to the east, the City of Hermosa Beach to the south, and the Pacific Ocean to the west. The City is almost entirely built out and contains vegetation that is ornamental.

The City is made up primarily of low density, single-family residential development, designated in the Land Use Element as Low Density Residential and zoned as RS. Medium and high-density residential areas (RM and RH zones) extend eastward from the City's coastline and comprise much of the City's LCP planning area. Other land use types include commercial, mixed-use, industrial, parks and open space, and public facilities. Zoning districts potentially impacted by the HEU include: the Medium-Density Residential (RM) zone, in only Area District 3; High Density Residential (RH) zone in all Area Districts; the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts; the Planned Development (PD) zone: and, the General Commercial (CG) zone.

**10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

Approval from the California Department of Housing and Community Development (HCD).

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

**Note:** Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City contacted three Native American individuals and/or tribal organizations on August 4, 2021:

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians, Kizh Nation
- Kenneth Kahn, Tribal Chairman, Santa Ynez Band of Chumash Indians
- Joseph Ontiveros, Cultural Resources Director, Sobaba Band of Luiseño Indians

The Santa Ynez Band of Chumash Indians, responded on August 9, 2020<sup>1</sup>, and again on August 23, 2021, stating that the Elders' Council requested no further consultation on the HEU but requested to be notified of any changes in scope, or if supplementary literature reveals additional information. No further

communication was received by the Santa Ynez Band of Chumash Indians, or any other Native American individuals and/or tribal organizations contacted on August 4, 2021. (For further discussion, see Section 3.18, Tribal Cultural Resources).

### Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology and Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

**Determination (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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Signature

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Date

## Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance

## Impact Evaluation Methodology and Assumptions

Based on information available to the City at the time of preparation of this ND, the following sections evaluate the 6<sup>th</sup> Cycle Housing Element's reasonably foreseeable direct and indirect impact on the environment.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, which demonstrates a need for land appropriately zoned to facilitate the additional required units. While a rezoning program is identified within the proposed Housing Element, the actual rezoning of property within the City to accommodate RHNA would occur at a future date and is not one of the discretionary actions being undertaken at this time. Although implementation of the programs contained in the document would facilitate residential development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, any proposed land use changes would follow the adoption of the proposed HEU and would be subject to future environmental review, as required, under CEQA, once sufficient information is made available. All future projects would be required to adhere to relevant development standards and design guidelines contained in the Planning and Zoning Ordinance and other applicable regulatory requirements governing the nature and quality of development within the City.

While underutilized parcels have been identified to accommodate 377 RHNA category units, the parcel locations for the bulk of the units required to fulfill the City's lower-income category obligations have yet to be determined. To meet a capacity deficit of approximately 406 lower-income units, through Program 2, the City has identified potential sites in the CG, PD, RM and RS zoning districts to be made available to accommodate residential uses appropriate for lower-income households within the approximate three-year planning horizon. Most of the qualifying sites were identified under the same criteria detailed in Sections 2, Project Description, for underutilized sites appropriate to accommodate development affordable to lower-income households; however, there are some sites which do not meet the underutilized criteria outlined under Section 2 but have been selected as there is interest to develop these sites or it is assumed that the overlay would create developer interest as these sites have not previously allowed for residential development. Figure 2.2-1, Potential Sites to Accommodate Lower-Income Shortfall, shows sites selected as having the potential for additional capacity to accommodate the City's remaining RHNA allocation for lower-income units, including a buffer to ensure sufficient capacity throughout the planning period. Ultimately however, only a fraction of the sites identified in the proposed HEU will ultimately be selected for overlay or rezone. As such, it would be inappropriate for this ND to conduct a site-specific level of analysis, as consideration of impacts resulting from development of all of the potential sites identified would significantly overestimate the HEU's impact on the environment.

Due to the programmatic nature and phased implementation strategy of the proposed Housing Element, it is anticipated that the HEU as currently described would not result in a significant impact to the environment. The analysis conducted in this ND recognizes that over half of the sites potentially affected have yet to be identified, and that implementation of any overlay or rezoning program would trigger additional CEQA review and the corresponding program level analysis, which would in-turn be required to assume the maximum build out made allowable by the proposed zone change(s). In addition, many future development facilitated by the HEU—including development as part of the rezoning program—would qualify as “infill” as defined in Section 21061.3 of CEQA. As infill, certain projects may be eligible for existing or proposed streamlining efforts and/or a categorical exemption (CE) under CEQA. However, as with any “project” level development, the precise nature of review required would be assessed by the City on a case-by-case basis, and certain projects accommodated by the HEU would still require

project level CEQA review and be subject to discretionary approval. In addition, regardless of whether the review process is discretionary or ministerial, any project proposed in the City would still be subject to all applicable ordinances, policies, and standards in effect as of the date of the developer agreement.

The City's existing streamlining processes specify that multifamily housing developments in residential zones (Medium-Density Residential District [RM], High-Density Residential District [RH], and Residential Planned Development District [RPD]) with less than six units are permitted to be developed by-right and are therefore ministerial and exempt from CEQA. In addition, projects with six units or more that qualify for a density bonus under State law are permitted subject only to a Precise Development Plan reviewed and approved by the City, which is similarly a ministerial process exempt from CEQA. Further, and as detailed above in Programs 3, 11, and 18, approval of the HEU would result in more project types qualifying for these existing streamlining processes and would likely facilitate additional measures to incentivize multifamily development within the City, such as the elimination of existing discretionary review requirements in favor of more streamlined administrative review processes. In addition, at the State level the California Legislature has recently passed a large volume of laws related to housing. These laws include Senate Bill (SB) 9 (by-right duplexes), SB 10 (allowing jurisdictions to upzone for up to ten units in certain locations), SB 290 (which reforms the State Density Bonus Law), and SB 478, which limits floor area ratio (FAR) and lot coverage standards that limit multifamily housing. This trend of laws aimed at addressing the State's housing affordability crisis is expected to continue into the 2022 legislative session and beyond and will likely result in the facilitation of further streamlining efforts and removal of "barriers" to development (including discretionary review requirements).

Housing developed under the existing capacity within the City would likely fall under the existing and/or proposed State and local streamlining programs and ultimately, upon completion of the rezoning program, projects processed in the future would also likely be eligible for streamlining or an exemption under CEQA. However, the predetermined criteria for selection that was applied to all existing and potential capacity sites identified in the HEU serves to promote residential development only in zones that have been previously screened for suitability to accommodate housing. Further, the precise language of the HEU programs and associated MBMC regulations would generally allow for a streamlined review process only under a limited and defined set of circumstances, where the primary objective is the achievement of measurable progress towards meeting the City's 6<sup>th</sup> Cycle RHNA allocation, as required by State law. In addition, when unique situations present themselves, housing projects would likely undergo a more comprehensive environmental review, where any impacts identified with the project would be addressed through mitigation specific to the impact.

## 3.1 Aesthetics

### 3.1.1 Environmental Setting

The City of Manhattan Beach (City) is located in the southwest portion of Los Angeles County (County) along the Pacific Ocean, approximately 19 miles southwest of Downtown Los Angeles. The City is bordered by the City of El Segundo and the Chevron Oil Refinery to the north, the cities of Redondo Beach and Hawthorne to the east, the City of Hermosa Beach to the south, and the Pacific Ocean to the west. The City is almost entirely built out and contains vegetation that is ornamental. Despite dense urbanization, there are a number of scenic resources in the City as well as in the broader Los Angeles County, including mountains, foothills, ridgelines, forests, deserts, beaches, and coastlines. Scenic resources visible throughout the City include the elevated terrain of the Santa Monica Mountains to the north, San Gabriel Mountains to the north/northeast, and, most predominantly, the City's

two miles of beach frontage to the west (City of Manhattan Beach 2003). Additionally, Pacific Coast Highway (PCH) bisects the City in a north/south direction. PCH is a Caltrans facility, also known as State Route 1, which connects the coastal cities of Los Angeles County to other coastal communities in northern and southern California. While certain extents of PCH provide opportunities to view the coastline, there are no coastal views accessible where the highway (i.e., Sepulveda Boulevard) traverses the City. The City also has designated “walk streets” which are defined in the MBMC as “dedicated public streets which have been closed to vehicular traffic” (City of Manhattan Beach 2001). Walk streets primarily run east to west throughout the coastal zone, traversing through medium and high-density residential neighborhoods and providing beach access to the public (City of Manhattan Beach 2003).

### 3.1.2 Regulatory Setting

#### Federal

There are no federal regulations pertaining to aesthetics and scenic resources that would apply to the HEU.

#### State

##### California Scenic Highway System

Created by the California State Legislature in 1963, the California Scenic Highway Program includes highways designated by the California Department of Transportation (Caltrans) as scenic. The purpose of the program is to protect the scenic beauty of California highways and adjacent corridors through conservation and land use regulation.

##### California Code of Regulations

###### Title 24 – California Building Standards Code

Title 24, California Building Standards Code, consists of regulations to control building standards throughout the state. The following components of Title 24 include standards related to lighting:

###### Title 24, Part 1 – California Building Code / Title 24, Part 3 – California Electrical Code

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

###### Title 24, Part 6 – California Energy Code

The California Energy Code (CEC) (Title 24, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. Section 130.2 sets forth requirements for Outdoor Lighting Controls and Luminaire Cutoff requirements. All outdoor luminaires rated above 150 watts shall comply with the backlight, up light, and glare (BUG) ratings in accordance with IES TM-15-11, Addendum A, and shall be provided with a minimum of 40% dimming capability activated to full on by motion sensor or other automatic control. This requirement does not apply to streetlights for the public right of way, signs, or building facade lighting.



Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in Section 10-114 of the CEC. Under Section 10-114, all urban areas within California are designated as Lighting Zone 3. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Facade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

## California Coastal Act of 1976

The California Coastal Act (California Public Resource Code sections 30000 et seq.) was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100-mile coastline for the benefit of current and future generations. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the California Coastal Act (CCA) to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. The Coastal Act requires local governments (15 coastal counties and 59 cities) to create and implement Local Coastal Programs (LCPs) that incorporate policies to protect, enhance and restore environmentally sensitive habitats, including intertidal and nearshore waters, wetlands, bays and estuaries, riparian habitat, certain wood and grasslands, streams, lakes and habitat for rare or endangered plants or animals, as well as the scenic beauty of coastal landscapes and seascape.

## Local

### City of Manhattan Beach General Plan

The following goals and policies from the City's General Plan relate to aesthetics and aesthetic impacts.

Goal CR-4: Preserve the existing landscape resources in the City and encourage the provision of additional landscaping.

Policy CR-4.1: *Protect existing mature trees throughout the City and encourage their replacement with specimen trees whenever they are lost or removed.*

Policy CR-4.4: *Review the tree ordinance to consider its application citywide and to determine the need to strengthen tree preservation criteria.*

Policy CR-4.5: Discourage the reduction of landscaped open space and especially the removal of trees from public and private land.

Policy CR-4.6: Prepare lists of appropriate landscaping materials for the climate and encourage residents and businesses to use them.

Goal LU-1: Maintain the low-profile development and small-town atmosphere of Manhattan Beach.

Policy LU-1.1: Limit the height of new development to three stories where the height limit is thirty feet, or to two stories where the height limit is twenty-six feet, to protect the privacy of adjacent properties, reduce shading, protect vistas of the ocean, and preserve the low-profile image of the community.

Goal LU-3: Achieve a strong, positive community aesthetic.

Policy LU-3.1: Continue to encourage quality design in all new construction.

Policy LU-3.2: Promote the use of adopted design guidelines for new construction in Downtown, along Sepulveda Boulevard, and other areas to which guidelines apply.

Policy LU-3.6: Encourage the beautification of the walkstreets, particularly through the use of landscaping.

Goal LU-4: Preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood's unique characteristics.

Policy LU-4.1: Protect public access to and enjoyment of the beach while respecting the privacy of beach residents.

Policy LU-4.4: Encourage the preservation and enhancement of unique residential homes and buildings throughout Manhattan Beach to preserve the culture and history of the City.

Policy LU-4.5: Encourage measures that recognize and work to protect buildings, landscaping, and other features important to the City's history.

Policy LU-4.6: When public improvements are made, they should preserve and maintain distinctive neighborhood characteristics.

Goal LU-5: Protect residential neighborhoods from the intrusion of inappropriate and incompatible uses.

Goal LU-7: Continue to support and encourage the viability of the Downtown area of Manhattan Beach.

Policy LU-7.6: Recognize the unique qualities of mixed-use development and balance the needs of both commercial and residential uses.

### Housing Element (2021)

The proposed Housing Element includes goals and policies to enhance the aesthetic quality of neighborhoods and housing environments including the following:

Policy 3.1: Eliminate potentially unsafe or unhealthy conditions in existing residential developments.

Program 8: Ensure building safety of residential buildings through enforcement of building codes on a compliance and proactive building-permit issuance basis, and through referrals to the County of Los Angeles Environmental Health Division for rental housing enforcement conditions/inspections.

Program 23: Amend the MBMC to eliminate provision 10.52.050.F such that all parcels operating as one site would be subject to existing maximum lot size requirements. This would help deter "mansionization" or construction of overly large dwellings that are out of scale with the surrounding neighborhoods.

## Manhattan Beach Municipal Code

### Section 7.36.150, Encroachment standards

This section requires avoidance of any obstruction to neighboring residents' scenic vistas and views caused by built structures, landscaping design, or otherwise. This section also includes design provisions for private and public structures (including private residences, fences, retaining walls, etc.) adjacent to City designated walk streets.<sup>8</sup>

### Chapter 7.48 – Coastal Zone

Within the City's coastal zone, as defined in Division 20 of the Public Resources Code and in Chapter 2.A of the certified Local Coastal Plan (LCP), all development, including changes in availability of public access and/or public parking, require a coastal development permit (CDP) and are governed by the provisions of Chapter 2.A and Division 20 of the Public Resources Code. Chapter 7.36, Encroachment Permit, is part of the City's certified LCP.

### Planning and Zoning Ordinance (Title 10)

The Planning and Zoning Ordinance sets forth requirements and design standards for base and overlay districts, as well as site specific requirements applicable to residential districts. This includes provisions related to appropriate exterior building materials, height, building and lot size requirements, establishing contingency fees to maintain the aesthetic quality of condominiums, and general compatibility and design standards for projects within residential areas so as to foster convenient, harmonious, and workable relationships among land uses. In particular Section 10.60.121(D) sets forth performance standards for glare that apply to all land uses, Section 10.52.020 prohibits metallic finishes on the exterior walls of all structures and Section 10.64.170 ensures that adequate lighting is provided for safety will also protecting residential uses from undue glare.

### Tree Preservation

#### Chapter 7.32, Tree, Shrub, and Plant Regulations

Chapter 7.32 establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way. This chapter sets forth measures related to proper selection of species, conditions of protected status, preservation, required permits and fees, and other general provisions related to care, maintenance, and overall aesthetic quality trees, shrubs, and plants in public spaces.

#### Section 10.52.120, Tree preservation and restoration in residential zones, Area Districts I and II.

Regulations provided for in the Section 10.52.120 are designed to preserve and enhance the existing healthy tree canopies on individual residential properties as well as the overall neighborhood. The design of residences, including grading, driveways, walkways, patios, utilities and right-of-way improvements, are required to consider and accommodate existing healthy protected trees, as reasonably feasible. For the purposes of this section a "protected tree" is defined as: any species of tree, (excluding deciduous fruit-bearing trees and *Washingtonia* species palms) the trunk of which is located at least partially within the required front yard or street side yard (on corner lots) of a site, with a trunk diameter of twelve inches (12") or greater or multiple trunks totaling twelve inches (12") in diameter or greater at a height of four and one-half feet (4.5') from existing grade; and any replacement tree required.

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<sup>8</sup> A "walk street" is defined in the Manhattan Beach Municipal Code as any street where vehicular use is prohibited.

City of Manhattan Beach Local Coastal Program

The Manhattan Beach Local Coastal Program (LCP), which has been certified by the California Coastal Commission, is the basic planning tool used by Manhattan Beach to guide development in the coastal zone. The LCP contains the foundation policy for future development and protection of coastal resources. The LCP specifies appropriate location, type, and scale of new or changed uses of land and water. The LCP contains a designation in the Zoning Map and measures to implement the plan. Prepared by the City, this program governs decisions that determine the short- and long-term conservation and use of coastal resources. While the LCP reflects the unique characteristics of Manhattan Beach, the LCP must also be consistent with the CCA goals and policies. The CCA requires consistency between the LCP and General Plan. Section 30500.1 of the CCA provides that an LCP is not required to include housing policies and programs. However, Section 30007 states that local governments are not exempt from meeting requirements of state and federal law with respect to providing low- and moderate-income housing or other obligations related to housing. In those circumstances where an issue is addressed by both the LCP and General Plan, the terms of the LCP would generally prevail, including as it applies to general development aesthetics, views, and scenic vistas (City of Manhattan Beach 2003).

3.1.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b> – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project have a substantial adverse effect on a scenic vista?*

**Less Than Significant Impact.** Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines, that are accessible from public vantage points, such as public roadways and parks. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. A substantial adverse effect on a scenic vista would occur if the HEU would significantly degrade the scenic landscape as viewed from public roads or other public areas.

The City's topography consists of rolling hills, which affords public vistas of the two-mile long sandy shore coastline as well as the expansive backdrop of the Pacific Ocean and horizon line. As previously discussed, the HEU consists of a policy document update, and adoption of the HEU alone would not produce environmental impacts. Because all the qualifying sites under consideration for increased development intensity and intervening development are within existing urban and semi-urban built-out areas, the HEU is not anticipated to have a substantial adverse effect on scenic vistas within the City. Further, there are a variety of existing regulatory processes that would serve to minimize any potential impacts related to future residential development facilitated by the Housing Element. Several sections provided for in the Planning and Zoning Ordinance (Title 10 of the MBMC) regulate physical development by controlling not only the appearance of new residential development, but also the placement of new development, so as to create housing that is "harmonious" within the context of the surrounding houses and neighborhood (refer to Regulatory Setting, above). MBMC Section 7.36.150 applies to certain private improvements in the public right-of-way (e.g., retaining walls, staircases, landscaping) in order to avoid obstructions to public scenic vistas and views. In addition, all development taking place within the LCP boundary area would be subject to additional provisions set forth in the City's LCP, which identifies the location, type, densities, and other ground rules for development in the coastal zone, including the provision to enhance and protect the scenic beauty of coastal landscapes (City of Manhattan Beach 2003). Compliance with provisions of the Planning and Zoning Ordinance as well as the CCA and LCP would be ensured through the City's development review and building permit process.

Additionally, according to the City's General Plan EIR, there are no officially designated scenic vistas in the City. However, the Land Use Element of the General Plan includes several goals and policies aimed at minimizing potentially adverse view impacts, including Policy LU-1.1 which limits the height of new development to two or three stories to "protect vistas of the ocean". A number of other General Plan goals and policies listed above in the Regulatory Setting section above would also serve to minimize potential impacts by preventing degradation of existing vistas and promoting actions that would make existing scenic vistas more accessible, such as Goal 4 and Policy LU-4.1.

Ultimately, potential aesthetic-related impacts are location specific and cannot be assessed in a meaningful way until the location of a project sites are known and the development planned on those sites is defined. While the future rezoning program, which would be undertaken as an action separate from the adoption of the HEU, would allow for greater intensities than previously permitted in certain areas of the City, the existing regulatory setting and the infill locations selected as part of HEU sites analysis would ensure that future potential impacts to scenic vistas associated with adoption of the HEU would be less than significant. Additionally, approval of the HEU itself, as a policy document update, would not provide any goals, policies, or programs that would significantly degrade the scenic resources of the City. Furthermore, the HEU includes goals and policies to enhance the aesthetic quality of neighborhoods and housing environments,

such as eliminating potentially unsafe or unhealthy conditions in existing residential developments (Policy 3.1), implementing a renewed effort to enforce building code compliance of existing and proposed residential housing (Program 8), and continuing to deter construction of overly large dwellings that are out of scale with the surrounding neighborhoods (Program 23). Therefore, impacts to scenic vistas would be less than significant and no mitigation is required.

**b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

**No Impact.** As discussed above under Regulatory Setting, the California Scenic Highway Program includes highways designated by Caltrans as scenic. There are currently no designated state scenic highways or eligible state scenic highways in the City of Manhattan Beach. The nearest eligible scenic highway, Route 1, runs from Route 187 near the City of Santa Monica (approximately 6.38 miles northwest of the Project site), to Route 101 near El Rio in Ventura County. The nearest officially designated State scenic highway, Route 27 near the Topanga State Park, is located approximately 13 miles northwest of the Project site (Caltrans 2021). Due to distance, intervening terrain, and intervening development, the HEU would not be visible from the eligible State scenic segment of Route 1 nor the officially designated State scenic highway segment of Route 27, and no impacts would occur.

**c) *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

**Less Than Significant Impact.** California Public Resources Code Section 21071 defines an “urbanized area” as “(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.” As previously discussed, the project would be required to comply with existing State and local regulations and would be consistent with the General Plan Goals and Policies governing scenic quality. This includes consistency with Goal LU-4, to preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood’s unique characteristics. In addition, provisions of the Planning and Zoning Ordinance regulate physical development by controlling not only the appearance of new residential development, but also the placement of new development, so as to ensure aesthetic compatibility. In addition, sites identified within the LCP Boundary, including the currently proposed Verandas at 401 Rosecrans Avenue project, would be required to comply with LCP and CCA regulations, including the provision to protect the scenic qualities of coastal landscapes (City of Manhattan Beach 2003).

According to the General Plan Community Resources Element (2003), trees on both public and private property provide tremendous value, aesthetic and otherwise, to all City residents, and the City is committed to preserving existing trees and expanding the urban forest by replacing damaged or dying trees and planting new trees. In addition, the Community Resources Element states that well-maintained landscaping can beautify property, adding character and uniqueness to private and public areas. As such, the City’s General Plan includes several Goals and Policies related to the preservation and maintenance of trees and landscaping, including Goal CR-4 which requires that new development proposals preserve existing

landscape resources in the City, and encourages the provision of additional landscaping (see Regulatory Framework for specific General Plan Policies related to landscaping and tree preservation). In addition, the City's MBMC establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way (Chapter 7.32, Tree, Shrub, and Plant Regulations), as well as measures to preserve and enhance the existing healthy tree canopies on individual residential properties and neighborhoods in Areas 1 and 3 (Section 10.52.120, Tree preservation and restoration in residential zones, Area Districts I and II).

The project would not, in and of itself, result in impacts to scenic resources or visual character, and would not conflict with applicable zoning and other regulations governing scenic quality. As discussed, all future rezoning efforts or residential development projects would require program or project-specific environmental evaluation to determine that any potential impacts are less than significant. In addition, potential aesthetic-related impacts are location specific and cannot be assessed in a meaningful way until the project site parcels are confirmed and the development planned on those sites is defined. Therefore, no significant impact would result from implementation of the HEU with respect to the degradation of the existing visual character and/or quality of the site, and impacts would be less than significant. No mitigation is required.

**d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

**Less Than Significant Impact.** Lighting is of most concern when it has the potential to spill over or trespass from a project site onto sensitive surrounding land uses, such as residential properties, resulting in a potential nuisance. Extraneous glare is associated with the use of highly reflective building materials (glass, steel etc.). The proposed HEU will not, in and of itself, create sources of substantial light or glare that adversely affect views. The future rezoning program would occur in an urbanized context and be evaluated separately at the time when parcels for rezoning are fully identified.

As described in Threshold 3.1(c), while the HEU consists of a policy document update that is not anticipated to produce environmental impacts, the City has identified qualifying sites within the CG, PD, RM, and RS zones that could be included in the future rezoning effort and would therefore allow for greater densities than are currently allowed. However, as discussed, the implementation of any overlay or rezoning effort would require future CEQA review and discretionary approval.

The adoption of the HEU would ultimately encourage additional development in certain preidentified areas throughout the City; however, the City's Planning and Zoning Ordinance (Title 10 of the MBMC) contains provisions intended to limit adverse light and glare impacts. Section 10.60.121(D) sets forth performance standards for glare that apply to all land uses, while Section 10.52.020 prohibits metallic finishes on the exterior walls for all structures (other than accessory structures) within residential areas. In addition, Section 10.64.170 regulates exterior lighting, and is intended to ensure that adequate lighting is provided for personal and traffic safety while also protecting nearby residential uses from undue glare. Provisions of this section include required shielding, height restrictions, and maximum acceptable levels of illumination within range of residential uses.

Ultimately, potential light and/or glare related impacts are location specific and cannot be assessed in a meaningful way until the location of a project site is known and the development planned on those sites is defined. At such time that a development proposal is considered that project will be subject to adopted development guidelines/standards, and any impacts identified with the development project will be addressed through mitigation measures specific to the impact. In addition, all future projects would be required to comply with applicable MBMC standards which would further reduce the potential for significant impacts. As such, and with compliance with applicable City and State regulations, the HEU would have a less than significant impact regarding the creation of a new source of substantial light or glare, which would adversely affect day or nighttime views in the area, and no mitigation is required.

### 3.1.4 References

Caltrans (California Department of Transportation). 2021. California State Scenic Highway System. Accessed September 17, 2021. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983>.

City of Manhattan Beach. 2001. Manhattan Beach Municipal Code. Revised and republished 2001. Accessed September 19, 2021. [https://library.municode.com/ca/manhattan\\_beach/codes/code\\_of\\_ordinances?nodeId=MANHATTAN\\_BEACH\\_CALIFORNIAMUCO](https://library.municode.com/ca/manhattan_beach/codes/code_of_ordinances?nodeId=MANHATTAN_BEACH_CALIFORNIAMUCO).

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

## 3.2 Agriculture and Forestry Resources

### 3.2.1 Environmental Setting

#### Mapped Important Farmland

The California Department of Conservation (CDOC) and U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) classify agricultural lands into five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential. Non-farmlands are classified as Grazing Land, Urban and Built-Up Land, Other Land, or Water. The City of Manhattan Beach is classified as Urban and Built-Up land by the CDOC Farmland Mapping and Monitoring Program (FMMP), defined as land used for residential, industrial, commercial, construction, institutional, public administrative purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. This classification also includes vacant and nonagricultural land which is surrounded by urban development and is less than 40 acres (CDOC 2021a, 2021b).

#### Forests

Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (California Public



Resources Code Section 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (California Public Resources Code Section 4526). Pursuant to these definitions, there are no forests, forest land, or timber land in the City of Manhattan Beach.

## 3.2.2 Regulatory Setting

### Federal

There are no federal regulations pertaining to farmland and forestry resources that would apply to the HEU.

### State

#### State Farmland Mapping and Monitoring Program

The goal of the state FMMP is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California’s agricultural land resources. FMMP produces Important Farmland Maps, which are a hybrid of resource quality (soils) and land use information. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every 2 years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance. Data are also released in statistical formats—principally the biennial California Farmland Conversion Report.

#### California Land Conservation Act (Williamson Act)

The Williamson Act provides tax incentives to retain prime agricultural land and open space in agricultural use, which subsequently slows its conversion to urban development. The Williamson Act requires a 10-year contract between the County and landowners who enter into contracts with local government for long-term use restrictions on qualifying agricultural and open space land. In accordance with the contract, the land must be taxed based on its agricultural use rather than its full market value. The overall purpose of the Williamson Act is to protect agricultural lands and open space.

### Local

As there is no farmland, forestland, or timberland within City of Manhattan Beach, there are no local regulations related to agriculture or forestry resources that would apply to the HEU.

### 3.2.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** As discussed above, the City of Manhattan Beach is classified entirely as Urban and Built-Up land by the CDOC FMMP, and there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance identified within the City’s boundaries. (DOC 2021a). Therefore, implementation of the HEU would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impact would occur.

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

**No Impact.** The City of Manhattan Beach has no zoning for agricultural use and no land subject to a Williamson Act contract. While the City does have a limited amount of designated open space, none of this land is zoned for agricultural use. Further, the HEU does not propose any changes to lands currently zoned as Open Space (OS) by the City's Zoning Designations map (City of Manhattan Beach 2004). Therefore, the HEU would not conflict with existing zoning for agricultural use, or a Williamson Act contract. The HEU would therefore have no impact.

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

**No Impact.** As previously discussed, there are no parcels within the City that are zoned as forest land or timberland. Additionally, there is no forest land or any land that is designated for the purposes of conserving forest land within the City. Therefore, the HEU would have no impact on forest or timberland.

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

**No Impact.** There are no parcels within the City that are zoned as forest land. Additionally, there is no forest land or any land that is designated for the purposes of conserving forest land within the City. Therefore, the HEU would not result in the loss of forestland or conversion of forest land to non-forest use, and no impact would occur.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

**No Impact.** While there is no forestland or land zoned for agricultural use within the City, there is a limited amount of designated Open Space. The HEU does not propose to make any changes to parcels currently zoned Open Space (OS). As such, the HEU would not involve changes that could result in the conversion of Farmland to non-agricultural uses or forest land to non-forest use. No impact would occur.

### 3.2.4 References

CDOC (California Department of Conservation). 2021a. California Important Farmland Finder. Accessed September 23, 2021. <https://maps.conservation.ca.gov/DLRP/CIFF/>

CDOC. 2021b. Important Farmland Mapping Categories and Soil Taxonomy Terms. Accessed September 23, 2021. [https://www.conservation.ca.gov/dlrp/fmmp/Documents/soil\\_criteria.pdf](https://www.conservation.ca.gov/dlrp/fmmp/Documents/soil_criteria.pdf)

City of Manhattan Beach, 2004. City of Manhattan Beach Zoning Designations (Map). Adopted August 2004. Accessed September 23, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/76/637364644090270000>

## 3.3 Air Quality

### 3.3.1 Environmental Setting

Ambient air quality is generally affected by climatological conditions, the topography of the air basin, the type and amounts of pollutants emitted, and, for some pollutants, sunlight. The City is located within South Coast Air Basin (SCAB). Topographical and climatic factors in the SCAB create the potential for high concentrations of regional and local air pollutants. This section describes relevant characteristics of the air basin, types of air pollutants, health effects, and existing air quality levels.

The SCAB includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and State standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), particulate matter equal to or less than 10 microns in aerodynamic diameter (PM<sub>10</sub>), particulate matter equal to or less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>), and lead (Pb). In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

### 3.3.2 Regulatory Setting

#### Federal

##### Federal Clean Air Act

The federal Clean Air Act passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The U.S. Environmental Protection Agency (EPA) is responsible for implementing most aspects of the Clean Air Act, including the setting of National Ambient Air Quality Standards (NAAQS; federal standards) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emissions standards and permits, acid rain control measures, stratospheric O<sub>3</sub> protection, and enforcement provisions. Federal standards are established for criteria pollutants under the Clean Air Act, which are O<sub>3</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead.

The federal standards describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The federal standards (other than for O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. Federal standards for O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the federal standards at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the federal standards must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the federal standards to the states. In California, the task of air quality management and regulation has been legislatively granted to California Air Resources Board (CARB), with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels.

## State

### California Clean Air Act

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. As stated previously, an ambient air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health. For each pollutant, concentrations must be below these relevant CAAQS before a basin can attain the corresponding CAAQS. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O<sub>3</sub>, CO, SO<sub>2</sub> (1-hour and 24-hour), NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded.

### Toxic Air Contaminants

The State Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California toxic air contaminant (TAC) list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with Assembly Bill (AB) 2728, the State list includes the (federal) HAPs. Furthermore, in 1987, the Legislature enacted the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) to address public concern over the release of TACs into the atmosphere. In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. The regulation would result in an 80% decrease in Statewide diesel health risk in 2020 compared with the diesel risk in 2000. Other Airborne Toxic Control Measures that reduce diesel emissions, including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

## Regional/Local

### South Coast Air Quality Management District (SCAQMD)

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, State, and local air pollution control regulations in the SCAB, where the project site is located. The SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to

attain State and federal ambient air quality standards in the SCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

The most-recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD governing board on March 3, 2017. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP addresses criteria air pollutant emissions from ocean-going vessels, which are considered federal sources, and includes emissions associated with marine vessels and engines in the baseline year and future forecasts. The 2016 AQMP's overall control strategy is an integral approach relying on fair-share emission reductions from federal, State, and local levels. The 2016 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources (SCAQMD 2017). These control strategies are to be implemented in partnership with CARB and the EPA.

### Potentially Applicable Rules

Emissions that would result from stationary and area sources during construction and operation be subject to SCAQMD rules and regulations. The SCAQMD rule applicable to construction of residential dwelling units within the City may include the following:

**Rule 403:** Fugitive Dust. This rule requires fugitive dust sources to implement best available control measures for all sources to ensure all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (SCAQMD 2005). South Coast Air Basin Attainment Designation (SCAB)

Pursuant to the 1990 federal Clean Air Act amendments, the EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on CAAQS rather than the NAAQS.

The SCAB is designated as a nonattainment area for federal and state O<sub>3</sub> standards and federal and State PM<sub>2.5</sub> standards. The SCAB is designated as a nonattainment area for state PM<sub>10</sub> standards; however, it is designated as an attainment area for federal PM<sub>10</sub> standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and State NO<sub>2</sub> standards, and federal and State SO<sub>2</sub> standards. While the SCAB has been designated as nonattainment for the federal rolling three-month average lead standard, it is designated attainment for the State lead standard (CARB 2020; EPA 2021).

### Southern California Association of Governments (SCAG)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SCAG serves as the federally designated metropolitan planning organization for the Southern California region and is the largest metropolitan planning organization in the United States.

On September 3, 2020, SCAG’s Regional Council voted to approve the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)). The Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal embodies a collective vision for the region’s future and is developed with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2020).

### City of Manhattan Beach General Plan

The following goals and policies related to air quality are applicable to the HEU.

Goal CR-6: Improve air quality.

Policy CR-6.1: Encourage alternative modes of transportation, such as walking, biking, and public transportation, to reduce emissions associated with automobile use.

Policy CR-6.3: Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.

Policy CR-6.4: Cooperate and participate in regional air quality management planning, programs, and enforcement measures.

### 3.3.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?***

**Less Than Significant Impact.** The HEU is a policy document for future actions that would occur within the SCAB, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the SCAQMD.

The SCAQMD administers the AQMP for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all CAAQS and NAAQS. The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region’s ability to comply with federal and state air quality standards. The relevant criteria are as follows discussed below (SCAQMD 1993):

**Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.

The HEU is a policy document and adoption will not directly result in short-term construction or long-term operational emissions. In addition, future residential projects would be required to demonstrate that they would not conflict with the applicable SCAQMD AQMP, and potential project-specific short- and long-term impacts to air quality would be assessed at the time the projects are proposed. Furthermore, future development that is envisioned within, yet not permitted directly by, the HEU would be subject to federal, State, and local ambient air quality standards. Therefore, the HEU would not conflict with Consistency



Criterion No. 1 because it would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay the timely attainment of air quality standards of interim emission reductions specified in the AQMP.

**Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG for its RTP/SCS to develop the emission inventory for the 2016 AQMP (SCAQMD 2017). The RTP/SCS's forecasts are in turn based on general plans for cities and counties in the SCAB.<sup>9</sup> The SCAG 2016 RTP/SCS and associated Regional Growth Forecast are also generally consistent with the local plans. Therefore, the 2016 AQMP is generally consistent with local government plans through its use of information in SCAG's RTP/SCS.

The City has been assigned a RHNA of 774 units for the 2021–2029 Housing Element which consists 332 very-low-income units, 165 low-income units, 155 moderate income units, and 132 above-moderate income units (SCAG 2021). This level of growth is consistent with the General Plan, and the HEU is intended to conform with the 2021-2029 update cycle for jurisdictions in the SCAG region. Therefore, the HEU will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase. The HEU does not conflict with the AQMP and would not increase population growth beyond what is forecasted in the most recently adopted AQMP.

Based on the considerations presented for the two criteria, the HEU will not conflict with or obstruct the implementation of the 2016 AQMP, and impacts relating to the HEU's potential to conflict with, or obstruct implementation of, the applicable AQMP would be less than significant.

- b) ***Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

**Less Than Significant Impact.**

The HEU is a policy document and as such does not propose specific development projects, but facilitates density needed to accommodate the 6<sup>th</sup> cycle RHNA allocation. Because specific projects are not known at this time and the HEU merely identifies potential capacity for future units that could be constructed, the City cannot assess the specific impacts of development in qualitative terms. All future housing development projects built under the HEU would be subject to the policies listed above, and if unique circumstances are present such that future housing development was not allowed by-right or eligible for streamlining or a CEQA exemption, would undergo project specific environmental review.

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<sup>9</sup> Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled (VMT) and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

Nonetheless, it is acknowledged that future development associated with the HEU could result in an increase in criteria pollutants during construction activities, such as excavation and grading, and operational activities, which could also contribute to the nonattainment status (O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) of the SCAB. Fugitive dust emissions would result from land clearing, grading operations, and construction equipment operations over the unpaved project site. Combustion emissions, such as NO<sub>x</sub> and PM<sub>10</sub>, are most significant when using large diesel-fueled scrapers, loaders, bulldozers, haul trucks, compressors, generators, and other types of equipment. All future projects built under the HEU would be required to comply with all regional and local regulations such as with SCAQMD Rule 403 to control dust emissions during any dust-generating activities.

Regarding potential operational impacts, proposed future development, which would be residential in character, would not result in a significant long-term impact to air quality. The HEU anticipates population and housing growth consistent with the Land Use Element as well as regional plans to accommodate growth based on household size and dwelling unit potential for this planning period, which, as described above, is in turn consistent with the assumptions in the 2016 AQMP. Most projects facilitated by the HEU would be small in nature and would not be expected to exceed the SCAQMD emission thresholds. In addition, projects that are proposed under the HEU would be subject to the policies listed above, and if unique circumstances are present such that future housing development was not allowed by-right or eligible for streamlining or a CEQA exemption, would undergo project specific environmental review. Furthermore, the HEU has policies and programs designed to promote infill development, encourage mixed use, promote housing within walking or biking distance of employment or school, and encourage downtown housing close to jobs, services, government, recreation, and more. The Community Resources Element of the City's General Plan also contains policies to ensure air quality impacts are reduced, as follows:

Policy CR-6.1: Encourage alternative modes of transportation, such as walking, biking, and public transportation, to reduce emissions associated with automobile use.

Policy CR-6.3: Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.

Policy CR-6.4: Cooperate and participate in regional air quality management planning, programs, and enforcement measures.

As stated above, the HEU is a policy document and as such does not propose specific development projects. The HEU would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. Therefore, potential air quality impacts would be less than significant.

c) ***Would the project expose sensitive receptors to substantial pollutant concentrations?***

**Less Than Significant Impact.** The HEU does not propose specific development plans and merely identifies how the City will go about providing the capacity for a total of 479 new units between 2021 and 2029; therefore, potential air quality impacts including potential sensitive receptors are unknown at this time. However, future development is expected to be primarily infill development, which could potentially be located in close proximity to other residences, schools, and/or parks and would be subject to policies and standards presented by SCAQMD, as well as the General Plan and MBMC for construction standards regarding air quality. Additionally, CARB has published the *Air Quality and Land Use Handbook: A*

*Community Health Perspective* (CARB 2005), which identifies certain types of facilities or sources that may emit substantial quantities of toxic air contaminants (TACs) and therefore could conflict with sensitive land uses, such as “schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities.” The facilities or sources that may emit substantial quantities of TACs include the following:

- High-traffic freeways and roads
- Distribution centers
- Rail yards
- Ports
- Refineries
- Chrome plating facilities
- Dry cleaners
- Large gas dispensing facilities.

The *Air Quality and Land Use Handbook* is a guide for siting of new sensitive land uses, but it does not mandate specific separation distances to avoid potential health impacts. CARB recommends that sensitive receptors not be located downwind or in proximity to such sources to avoid potential health hazards. The HEU is focused on development of housing and would not include any of the previously listed land uses that may emit substantial quantities of TACs.

The greatest potential for TAC emissions would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks during the future residential development’s construction activities and the associated potential health impacts to sensitive receptors. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual receptor; however, such assessments should also be limited to the period/duration of activities associated with the project. As previously discussed, specific projects are not identified and the HEU is a policy document, adoption will not result in direct short-term construction emissions. Furthermore, future residential development would also not require the extensive operation of heavy-duty diesel construction equipment and diesel trucks, which are subject to a CARB Airborne Toxics Control Measure to reduce DPM emissions.

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate the potential of localized air quality impacts to sensitive receptors in the immediate vicinity of a project from construction and operation; however, an operational LST analysis is only applicable to land uses with on-site emission sources and is generally not applicable to residential land uses as they do not include substantial on-site sources of localized emissions. In addition, the LST methodology was developed to be used as a tool to assist lead agencies to analyze localized impacts associated with project-level impacts. However, the LSTs are applicable to projects at the project-specific level and are not applicable to regional projects, such as the HEU, as specific projects have not been identified at this time. Therefore, neither a construction nor an operational LST analysis is recommended or provided herein.

Localized carbon monoxide (CO) impacts or CO hotspots can be associated with heavily congested intersections. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities; therefore, the potential for CO hotspots in the SCAB is steadily decreasing. The SCAQMD conducted CO modeling for the 2003 AQMP<sup>10</sup> for the four worst-case intersections in the SCAB. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day; however, the peak modeled CO 1-hour concentration was estimated to be 4.6 while the CAAQS is 20 ppm. Similarly, the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the HEU is a policy document and does not include specific development, it would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day; therefore, a CO hotspot is not anticipated to occur and associated impacts would be less than significant.

Regarding health effects associated with criteria air pollutants, health effects associated with O<sub>3</sub> include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue; health effects associated with NO<sub>x</sub> include lung irritation and enhanced allergic responses; health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness; and health effects associated with particulate matter (PM<sub>10</sub>) include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2021). Because the HEU is a policy document, it is not directly anticipated to generate construction or operational criteria air pollutant emissions or potential associated health effects.

Therefore, the HEU would not expose students, faculty, children, elderly and other sensitive receptors to toxic air contaminant (TAC) emissions from these sources. As such, impacts would be less than significant

**d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

**No Impact.** The HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of 479 new units, and adoption will not, in itself, result in environmental impacts. No odors would be generated by adopting this policy document; as such, no impacts would occur.

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<sup>10</sup> SCAQMD's CO hotspot modeling guidance has not changed since 2003.

### 3.3.4 References

- CARB (California Air Resources Board). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005. Accessed August 2016. <http://www.arb.ca.gov/ch/landuse.htm>.
- CARB. 2020. "Area Designation Maps/State and National." Last updated October 2020. <http://www.arb.ca.gov/desig/adm/adm.htm>.
- CARB. 2021. "Common Air Pollutants." <https://ww2.arb.ca.gov/resources/common-air-pollutants>.
- City of Manhattan Beach. 2021. Manhattan Beach Powered by 100% Green, Renewable Energy. Accessed October 28, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/48048/637691230191730000>.
- EPA (U.S. Environmental Protection Agency). 2021. "Region 9: Air Quality Analysis, Air Quality Maps." Last updated June 10, 2021. <http://www.epa.gov/region9/air/maps/>.
- SCAG (Southern California Association of Governments). 2020. *The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, Connect SoCal*. <https://www.connectsocial.org/Documents/Adopted/fConnectSoCal-Plan.pdf>.
- SCAG. 2021. SCAG 6<sup>th</sup> Cycle Final RHNA Allocation Plan. Accessed September 13, 2021. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899>
- SCAQMD (South Coast Air Quality Management District). 1993. *CEQA Air Quality Handbook*.
- SCAQMD. 2017. *2016 Final Air Quality Management Plan*.

## 3.4 Biological Resources

### 3.4.1 Environmental Setting

Manhattan Beach is a built-out urban community. There are no riparian habitats, wetlands, or other sensitive habitat conservation areas within the City (City of Manhattan Beach 2003a). Inland environmentally sensitive areas in the City are generally zoned and protected as parklands (City of Manhattan Beach 2003b). However, the City has two miles of beach frontage and 40 acres of recreational beach area. A significant portion of the City is within the City and State designated coastal zone, wherein impacts to coastal resources are always of concern (City of Manhattan Beach 2003b).

Policies governing land use in the coastal zone constrain residential development to some extent, but they are necessary to support the Local Coastal Plan (LCP) and California Coastal Act (CCA) policies, described below, including the protection, enhancement and restoration of coastal environmentally sensitive habitats, such as intertidal and nearshore waters and habitat for rare or endangered plants or animals (City of Manhattan Beach 2003b).

## 3.4.2 Regulatory Setting

### Federal

#### Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 provides legislation to protect federally listed plant and animal species. Impacts to listed species resulting from the implementation of a project would require the responsible agency or individual to formally consult with the U.S. Fish and Wildlife Service (USFWS) or National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries) to determine the extent of impact to a particular species. If the USFWS or NOAA Fisheries determine that impacts to a federally listed species would likely occur, alternatives and measures to avoid or reduce impacts must be identified. The USFWS and NOAA Fisheries also regulate activities conducted in federal critical habitat, which are geographic units designated as areas that support primary habitat constituent elements for listed species.

#### Federal Water Pollution Control Act of 1972

Under Section 404 of the Federal Water Pollution Control Act (also referred to as the Clean Water Act [CWA]), the U.S. Army Corps of Engineers (USACE), with U.S. Environmental Protection Agency (EPA) oversight, has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other “waters of the United States.” Perennial and intermittent creeks are considered waters of the United States if they have a “significant nexus” to traditional navigable waters, interstate waters, or territorial seas. In achieving the goals of the CWA, the USACE seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional “waters of the United States” would require a Section 404 permit from the USACE prior to the start of work. In 2008, the EPA and USACE, through a joint rulemaking, expanded the Section 404(b)(1) guidelines to include more comprehensive standards for compensatory mitigation. These standards include ensuring that unavoidable impacts subject to regulation under the CWA are replaced to promote no net loss of wetlands. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetlands is met by compensatory mitigation; in general, the type and location options for compensatory mitigation should comply with the hierarchy established by the USACE/EPA 2008 Mitigation Rule (in descending order): (1) mitigation banks; (2) in-lieu fee programs; and (3) permittee-responsible compensatory mitigation. Also, in accordance with Section 401 of the CWA, applicants for a Section 404 permit must obtain water quality certification from the appropriate Regional Water Quality Control Board (RWQCB). The USACE, RWQCB, and California Department of Fish and Wildlife (CDFW) typically take jurisdiction over wetlands that exhibit three parameters: suitable wetland hydrology, hydric soils, and hydrophytic vegetation. The RWQCB will also consider features with saturated, anaerobic-condition wetlands.

#### **Migratory Bird Treaty Act of 1918**

The Migratory Bird Treaty Act (MBTA) of 1918 protects all migratory birds, including their eggs, nests, and feathers. The MBTA was originally drafted to put an end to the commercial trade in bird feathers, popular in the latter part of the 1800s. The MBTA is enforced by the USFWS, and potential impacts to species protected under the MBTA are evaluated by the USFWS in consultation with other federal agencies.

## State

### California Endangered Species Act

The California Endangered Species Act (CESA) ensures legal protection for plants listed as rare or endangered and wildlife species formally listed as endangered or threatened. The CDFW also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under State law, the CDFW is empowered to review projects for their potential to impact special-status species and their habitats. Under the CESA, the CDFW reserves the right to request the replacement of lost habitat that is considered important to the continued existence to CESA-protected species.

### California Fish and Game Code

California Fish and Game Code (CFGF) Section 2081 provides for when the CDFW is authorized to issue permit to take a species listed as endangered, threatened, or candidate or a rare plant if the take is incidental to an otherwise lawful activity. CFGF Section 3511 includes provisions to protect fully protected species, such as: (1) Prohibiting take or possession “at any time” of the species listed in the statute, with few exceptions; (2) stating that no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to “take” the species; and (3) stating that no previously issued permits or licenses for take of the species “shall have any force or effect” for authorizing take or possession. The CDFW is unable to authorize incidental take of fully protected species when activities are proposed in areas inhabited by those species. Sections 3503 and 3503.5 of the CFGF state that it is unlawful to take, possess, or destroy the nest or eggs of any bird, with occasional exceptions. In addition, Section 3513 states that it is unlawful to take or possess any migratory bird as designated in the MBTA or any part of such migratory birds except as provided by rules and regulations under provisions of the MBTA. Under CFGF Section 1603, the CDFW is responsible for conserving, protecting, and managing California’s fish, wildlife, and native plant resources. To meet this responsibility, the law requires any person, State or local government agency, or public utility proposing a project that may impact a river, stream, or lake to notify the CDFW before beginning the project. If the CDFW determines that a project may adversely affect existing fish and wildlife resources, a Lake or Streambed Alteration Agreement is required. A Streambed Alteration Agreement lists the CDFW conditions of approval relative to a HEU and serves as an agreement between the City and CDFW for a term of not more than 5 years for the performance of activities subject to this section.

### Native Plant Protection Act

The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (CFGF Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under NPPA Section 1913(c), the owner of land where a rare or endangered native plant is growing is required to notify the department at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

### Porter-Cologne Water Quality Control Act of 1987

The State Water Resources Control Board (SWRCB) and each of the nine local RWQCBs, collectively referred to as the California Water Boards, has jurisdiction over “waters of the State,” which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State pursuant to the Porter-Cologne Water

Quality Control Act (California Water Code Division 7) (Porter-Cologne Act). The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to “isolated” waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction [General DWRs]). The local RWQCB (in this case, the Central Coast RWQCB) implements this general order for isolated waters not subject to federal jurisdiction and is also responsible for the issuance of water quality certifications pursuant to CWA Section 401 for waters subject to federal jurisdiction.

## California Coastal Act

The California Coastal Act (California Public Resource Code sections 30000 et seq.) was enacted by the State Legislature in 1976 to provide long-term protection of California’s 1,100-mile coastline for the benefit of current and future generations. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the CCA to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. The Coastal Act requires local governments (15 coastal counties and 59 cities) to create and implement Local Coastal Programs (LCPs) that incorporate policies to enhance and protect sensitive coastal resources.

## Local

### City of Manhattan Beach General Plan

The following goals and policies from the City’s General Plan relate to biological resources, and biological resources impacts.

Goal CR-4: Preserve the existing landscape resources in the City and encourage the provision of additional landscaping.

Policy CR-4.1: Protect existing mature trees throughout the City and encourage their replacement with specimen trees whenever they are lost or removed.

Policy CR-4.4: Review the tree ordinance to consider its application citywide and to determine the need to strengthen tree preservation criteria.

Policy CR-4.5: Discourage the reduction of landscaped open space and especially the removal of trees from public and private land.

Policy CR-4.6: Prepare lists of appropriate landscaping materials for the climate and encourage residents and businesses to use them.

Goal CR-5: Conserve and protect the remaining natural resources in Manhattan Beach.

Policy CR-5.1: Employ principles of a sustainable environment in the development, operation, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.



## Manhattan Beach Municipal Code

### Tree Preservation

#### Chapter 7.32, Tree, Shrub, and Plant Regulations

Chapter 7.32 establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way. This chapter sets forth measures related to proper selection of species, conditions of protected status, preservation, required permits and fees, and other general provisions related to care, maintenance, and overall aesthetic quality trees, shrubs, and plants in public spaces.

#### Section 10.52.120, Tree preservation and restoration in residential zones, Area Districts I and II.

Regulations provided for in the Section 10.52.120 (Tree Ordinance) are designed to preserve and enhance the existing healthy tree canopies on individual residential properties as well as the overall neighborhood. The design of residences, including grading, driveways, walkways, patios, utilities and right-of-way improvements, are required to consider and accommodate existing healthy protected trees, as reasonably feasible. For the purposes of this section a "protected tree" is defined as: any species of tree, (excluding deciduous fruit-bearing trees and *Washingtonia* species palms) the trunk of which is located at least partially within the required front yard or street side yard (on corner lots) of a site, with a trunk diameter of twelve inches (12") or greater or multiple trunks totaling twelve inches (12") in diameter or greater at a height of four and one-half feet (4.5') from existing grade; and any replacement tree required. The Tree Ordinance requires any person desiring to remove or relocate one or more protected trees must obtain a Tree Permit from the Community Development Department's Planning Division. In addition, replacement trees are required for any protected tree removed.

### City of Manhattan Beach Local Coastal Program

The LCP contains the foundation policy for protection of coastal resources. Prepared by the City, this program governs decisions that determine the short- and long-term conservation and use of coastal resources. While the LCP reflects the unique characteristics of Manhattan Beach, the LCP must also be consistent with the Coastal Act goals and policies. The Coastal Act requires consistency between the LCP and General Plan. In those circumstances where an issue is addressed by both the LCP and General Plan, the terms of the LCP should prevail.

### 3.4.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact.** The HEU would not have a substantial adverse effect on special-status species because the sites identified as appropriate for accommodating the City’s 6<sup>th</sup> Cycle RHNA allocation, consisting entirely of urban and semi-urban underutilized parcels, are disturbed, developed, and lack

suitable habitat for special-status species. The potential for any known sensitive species to occur on any parcels identified in the sites analysis as being suitable to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation is very low. In addition, for sites located within the LCP area boundary, the CCA and the LCP are designed to protect sensitive areas from development, including the protection, enhancement, and restoration of environmentally sensitive habitats, such as habitat for rare or endangered plants or animals. Any future development under the HEU within the LCP area boundary will be required to comply with applicable LCP and CCA requirements.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Although the policies and objectives of the HEU facilitate residential development to meet the City's 6<sup>th</sup> Cycle RHNA allocation, the HEU would not alter any local, regional, State, or Federal biological protection standards, nor would they alter the City's existing general plan policies related to protection and preservation of sensitive biological resources. The HEU would not have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species. Therefore, the HEU would have a less than significant impact on biological resources, and no mitigation is required.

- b) ***Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

**Less Than Significant Impact.** The HEU would not have a substantial adverse effect on riparian habitats or other sensitive natural communities identified in local or regional plans, policies, or regulations, by California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) because, as per the City of Manhattan Beach General Plan EIR (2003) there are no riparian habitats or other sensitive habitat conservation areas in the City. Vegetation throughout the City consists primarily of ornamental plantings that do not constitute a sensitive natural community. Several underutilized parcels identified in the HEU sites analysis are located within the LCP area boundary, where impacts to sensitive coastal resources are of particular concern. However, the CCA, LCP and General Plan have been designed to protect sensitive areas from development, including the protection, enhancement and restoration of environmentally sensitive habitats and habitat for rare or endangered plants or animals. Other environmentally sensitive areas outside of the LCP area boundary are generally zoned and protected as parklands (City of Manhattan Beach 2014). Additionally, General Plan Goal CR-5 and Policy CR-5.1 would require the programs proposed in the HEU to conserve and protect the remaining natural resources in the City and employ principles of a sustainable environment in the development, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of sensitive species habitat, riparian habitat, a sensitive natural community, federally protected wetlands, or wildlife corridors or nursery sites. The HEU would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. As such, the HEU would have a less than significant impact on biological resources, and no mitigation is required.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

**No Impact.** The HEU would not have a substantial adverse effect on state or federally protected wetlands because there are no wetlands located within the City (City of Manhattan Beach 2003b). The HEU would not alter any local, regional, state, or Federal biological protection standards, nor would it alter the existing General Plan, LCP, or CCA policies related to protection and preservation of sensitive biological resources.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Although the policies and objectives of the HEU facilitate housing, any new housing would have to comply with all current biological preservation policies, standards, and regulations. The proposed HEU does not encourage housing or development to be located within wetlands, riparian areas, or any other type of sensitive habitat areas. Therefore, the HEU would have no impact on state or federally protected wetlands.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

#### Native Resident or Migratory fish

**No Impact.** The parcels identified in the HEU's sites analysis as having potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation do not support any waters of the United States, waters of the State, or wetlands under the jurisdiction of the Regional Water Quality Control Board, or any associated riparian habitat under the jurisdiction of CDFW (City of Manhattan Beach 2003b). As such, no impact to any migratory fish would occur.

#### Native Resident Wildlife Species

**Less Than Significant Impact.** The City is located within an urban and semi-urban area that is highly disturbed, contains numerous buildings, and, although partially located within the LCP boundary area, does not contain any major bodies of water or undisturbed open space areas that could contain or support habitat for native resident wildlife species. The City cannot be characterized as an undisturbed open space area which could potentially support native wildlife species. Thus, the HEU would have a less than significant impact on native resident wildlife species, and no mitigation is required.

#### Migratory Wildlife Species

**Less Than Significant Impact.** The City is located in an urban area that contains numerous buildings, which would likely discourage stops by substantial numbers of migrating birds. However, the City does contain trees and shrubs that may support nesting sites for migratory wildlife bird species during nesting season. Nesting activity typically occurs from February 15 to August 31 (January 15 to August 31 for raptors). Disturbing or destroying active nests is a violation of the MBTA. In addition, nests and eggs are

protected under Fish and Game Code Section 3503, and the removal of vegetation during the nesting season is considered a significant impact due to potential effects on active nests. Any future development facilitated by adoption of the HEU and requiring removal of trees or shrubs during nesting season, would be required to comply with the MBTA. Compliance would require that, prior to any vegetation removal activities during the nesting season, a biological monitor would conduct a preconstruction nesting bird survey. If nesting bird surveys are conducted prior to any ground-disturbing activities, and none are present, impacts to nesting birds are not expected.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of established native resident or migratory wildlife corridors or nurseries. And any future development would be required to comply with State and federal requirements related to migratory birds. As such, impacts would be less than significant, and no mitigation is required.

- e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

**Less Than Significant Impact.** Under the existing conditions, the areas identified in the HEU sites analysis as having potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocations consist of underutilized urban and semi-urban sites with paved surfaces and buildings surrounded by existing development. Landscaping in these areas consists primarily of discontinuous areas of ornamental groundcover, trees, and shrubs. Any tree removal required by future residential development facilitated by HEU programs would be required to comply with MBMC tree preservation policies, including Chapter 7.32, Tree, Shrub, and Plant Regulations, which establishes regulations for trees, shrubs, and plants located on sidewalks, medians, or elsewhere in the public right of way, as well as the City's Tree Ordinance (Section 10.52.120), which requires tree removal permits and replacement of protected tree species.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas and would not alter any local, regional, State, or Federal biological protection standards, nor would the HEU adoption alter the City's existing policies or ordinances protecting biological resources. Therefore, the HEU would not conflict with any local policies or ordinances protecting biological resources. Any impacts to biological resources would be less than significant, and no mitigation is required.

- f) ***Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

**No Impact.** The HEU involves the adoption of a policy document which would not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), natural community conservation plan, or other approved local, regional, or state HCP because there are no designated HCPs or natural community conservation plans within the City (CDFW 2021). As such, no impacts would occur.

### 3.4.4 References

California Department of Fish and Wildlife. 2021. Conservation Plan and Habitat Conservation Plan Boundaries. Updated September 2021. Accessed October 29, 2021. <https://apps.wildlife.ca.gov/bios/>

City of Manhattan Beach. 2003a. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.

City of Manhattan Beach. 2003b. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2014. City of Manhattan Beach Housing Element (2013-2021). Accessed October 29, 2021.

## 3.5 Cultural Resources

### 3.5.1 Environmental Setting

Manhattan Beach's modern history began in 1888, when the first railroad spur (now Veterans Parkway) connected Redondo Beach Wharf to Downtown Los Angeles (City of Manhattan Beach 2003a, 2003b). The City's most notable historic feature is the Manhattan Beach State Pier. The pier was originally constructed in 1901 and referred to as the "old iron pier." The original pier was destroyed by a storm in 1913 and rebuilt in 1920. The 1920 pier was designed by City Engineer A.L. Harris. The roundhouse at the end of the pier was first constructed in 1922, which was considered a highly innovative design feature with helped mitigate wave and storm surge impacts (California State Parks 2021). However, seawater and annual storms damaged the pier severally in 1940 and again in 1980. The landmark was again reconstructed in 1956 and refurbished in 1990. It survives as Southern California's oldest remaining example of early reinforced concrete pier construction, and as a California State Historical Monument (No. 1018, Manhattan Beach State Pier) (City of Manhattan Beach 2003a, 2003b).

Other prominent historical structures include several residential landmarks. Scott House, constructed in 1960 along the Strand, is an International style duplex currently listed under the California Register of Historical Resources (CRHR), while the residence located at 2820 Highland Avenue has been designated as a local historical landmark, in accordance with Chapter 10.86 of the Planning and Zoning Code. Other residential properties of historical interest include several cottages located in neighborhoods mainly in the western portion of the community, which were originally built as summer vacation homes in the early 1900s (City of Manhattan Beach 2003b, 2018), however, these cottages have not been recognized in any official capacity (Arroyo Resources 2018; City of Manhattan Beach 2019; OHP 2010).

## 3.5.2 Regulatory Setting

### Federal

#### National Register of Historic Places

The National Register of Historic Places (NRHP) is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act (NHPA) as amended. Its listings encompass all National Historic Landmarks and historic areas administered by the National Park Service.

The National Park Service's guidance for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. The criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. To be listed in or determined eligible for listing in the NRHP, a property must be demonstrated to possess integrity and to meet at least one of the following criteria (36 CFR, Section 60.4):

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and;

1. That are associated with events that have made a significant contribution to the broad patterns of our history; or
2. That are associated with the lives of persons significant in our past; or
3. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
4. That have yielded, or may be likely to yield, information important in prehistory or history.

"Integrity" is defined in the National Park Service's National Register Bulletin "How to Apply the National Register Criteria" as "the ability of a property to convey its significance." *Id.* at 44. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (NPS 1990). NRHP guidance further states that properties generally must be at least 50 years of age to be considered for eligibility. Properties completed less than 50 years before evaluation must be proven to be "exceptionally important" (criteria consideration G) to be considered for listing.

A historic property is defined as follows (36 CFR 800.16[i][1]):

Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria.

## Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior's Standards are a series of concepts focused on maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. They function as common-sense historic preservation principles that promote historic preservation best practices. There are four distinct approaches that may be applied to the treatment of historical resources:

- Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- Rehabilitation acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods.
- Reconstruction recreates vanished or non-surviving portions of a property for interpretive purposes.

The choice of treatment depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation. The Guidelines provide general design and technical recommendations to assist in applying the Standards to a specific property. Together, the Standards and Guidelines provide a framework that guides important decisions concerning proposed changes to a historic property.

## Secretary's Standards for Rehabilitation

The following 10 Standards for Rehabilitation are used to determine if a project is in conformance with the Standards for a rehabilitation. To be in conformance, a project must be consistent with the historic character of the structure(s) and, where applicable, the district in which it is located. The following Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.



8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

## State

### California Register of Historical Resources

In California, the term “historical resource” includes but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code, Section 5020.1[j]). In 1992, the California Legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California Public Resources Code, Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP and are enumerated below. According to California Public Resources Code, Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are State landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

## California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- California Public Resources Code, Section 21083.2(g), defines “unique archaeological resource.”
- California Public Resources Code, Section 21084.1, and CEQA Guidelines, Section 15064.5(a), define “historical resources.” In addition, CEQA Guidelines, Section 15064.5(b), defines the phrase “substantial adverse change in the significance of an historical resource.” It also defines the circumstances when a project would materially impair the significance of a historical resource.
- California Public Resources Code, Section 21074(a), defines “tribal cultural resources.”
- California Public Resources Code, Section 5097.98, and CEQA Guidelines, Section 15064.5(e), set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- California Public Resources Code, Sections 21083.2(b) and (c), and CEQA Guidelines, Section 15126.4, provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

## Historical Resources

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code, Section 5024.1[q]), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5[b][1]; California Public Resources Code, Section 5020.1[q]). In turn, CEQA Guidelines, Section 15064.5(b)(2), states that the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g)

of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether the project would cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance would be materially impaired.

### Relationship with the Secretary of the Interior's Standards for the Treatment of Historic Properties

Under the California Code of Regulations, where a project has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the project's impact on historical resources would be considered mitigated to below a level of significance and, thus, not significant (14 CCR 15126.4[b][1]). In most cases, a project that demonstrates conformance with the Secretary of the Interior's Standards is categorically exempt from CEQA (14 CCR 15331), as described in the CEQA Guidelines (14 CCR 15126.4[b][1]):

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Weeks and Grimmer 1995), the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.

As discussed above in Section 3.5.2, Regulatory Settings, the Secretary of the Interior's Standards are a series of concepts focused on maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. They function as common-sense historic preservation principles that promote historic preservation best practices. The Standards encourage historic resources be approached with the basic objectives of preservation, rehabilitation, restoration, or reconstruction. The choice of treatment depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation. The Guidelines provide general design and technical recommendations to assist in applying the Standards to a specific property. Together, the Standards and Guidelines provide a framework that guides important decisions concerning proposed changes to a historic property.

### Unique Archaeological Resources

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require that reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (California Public Resources Code, Sections 21083.2[a], [b], and [c]).

California Public Resources Code, Section 21083.2(g), defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (California Public Resources Code, Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as Tribal cultural resource (California Public Resources Code, Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required. CEQA Guidelines, Section 15064.5, assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in California Public Resources Code, Section 5097.98.

#### Section 7050.5 of the California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human grave. In the unlikely event that human graves are encountered, work should halt in the vicinity and the County Coroner should be notified immediately. At the same time, an archeologist should be contacted to evaluate the situation and grave. If the human remains are determined to be of Native American origin, the Coroner must contact the NAHC within 24 hours of identification.

### Local

#### City of Manhattan Beach General Plan

The following goal and policies within the City's General Plan are related to cultural resources:

Goal LU-4: Preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood's unique characteristics.

Policy LU-4.4: Encourage the preservation and enhancement of unique residential homes and buildings throughout Manhattan Beach to preserve the culture and history of the City.

Policy LU-4.5: Encourage measures that recognize and work to protect buildings, landscaping, and other features important to the City's history.

Policy LU-4.6: When public improvements are made, they should preserve and maintain distinctive neighborhood characteristics.

#### Manhattan Beach Municipal Code

##### **Chapter 10.86, Historic Preservation**

The purpose of the Chapter 10.86 (Historic Preservation Ordinance) is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of improvements, buildings, structures, objects, sites, and features that represent the City's architectural, cultural, social, historical, and political heritage. A main component of the ordinance is to preserve diverse and significant

architectural styles and property types, safeguard the City's heritage and small-town beach atmosphere by encouraging the identification, recognition, and protection of landmarks representing significant elements of the City's history and culture, and adopting incentives that promote the preservation and rehabilitation of historic properties. Regulations include establishing conservation districts, inventorying and establishing criteria for dedication of historic resources, maintaining a historic register, requiring certificates of appropriateness, and enforcing penalties for ordinance violations. As provided, in Section 10.86.070(D), sites in the City are eligible for dedication as historic landmarks and/or if they have yielded or have the potential to yield information important to the prehistory or history of the city, region, State, or nation.

### 3.5.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?***

**Less Than Significant Impact.** As discussed under Environmental Setting, the City's most notable a historic feature is the Manhattan Beach State Pier, which is designated as a California State Historical Monument (No. 1018, Manhattan Beach State Pier) (City of Manhattan Beach 2003a, 2003b). California State Historical Monuments are buildings, structures, sites, or places that have been determined to have statewide historical significance. The Manhattan Beach State Pier is also listed in the CRHR (see Section 3.5.2, Regulatory Settings). The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources.

The City's other notable historical structures include Scott House, an International style duplex, which is also listed in the CHRH. In addition, the residence located at 2820 Highland Avenue has recently been designated as a local historical landmark by the City, in accordance with Chapter 10.86 of the Planning and Zoning Code, which would require any adjacent projects acquire a Certificate of Appropriateness from the City in order to break ground on construction. Finally, the City 's historical resources include several coastal residential cottages, which were originally built as summer vacation homes in the early 1900s (City of Manhattan Beach 2003b, 2018, however, these cottages are not recognized or protected as historic resources in any official capacity (Arroyo Resources 2018; City of Manhattan Beach 2019; OHP 2010).

The City has long been committed to the maintenance and preservation of its residential neighborhood (City of Manhattan Beach 2014.). This commitment would not change as a result of adoption of the HEU. The City's General Plan, as well as the HEU, aims to preserve and maintain residential neighborhoods and to protect residential neighborhoods from the intrusion of incompatible and character-changing uses, including any protecting any structure, residential or otherwise, of noted historical or cultural significance. Preservation of the City's historic resources is further upheld via required conformance with Chapter 10.86, Historic Preservation, of the MBMC, which aims to safeguard the City's heritage and small-town beach atmosphere by encouraging the identification, recognition, and protection of landmarks representing significant elements of the City's history and culture.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would facilitate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. While new housing could be constructed on sites containing historic resources, the existing regulatory framework would ensure that all impacts to historic resources from future development are less than significant. The HEU would not change or alter policies to protect and/or review historic resources and would not cause a substantial adverse change in the significance of historical resources. Therefore, impacts would be less than significant, and no mitigation is required.

**b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

**Less Than Significant Impact.** According to Chapter 10.86, Historic Preservation, of the MBMC, "prehistory" refers to the period in history prior to the advent of written records, revealed through archaeological and paleontological discoveries and analysis. As provided, in Section 10.86.070(D), sites in the City are eligible for dedication as historic landmarks if they have yielded or have the potential to yield information important to the prehistory or history of the city, region, state, or nation.

In addition to local protections, and pursuant to the California Public Resources Code, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require that reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (California Public Resources Code, Sections 21083.2[a], [b], and [c]).

The City is virtually built out and does not contain any known archaeological or paleontological resources (City of Manhattan Beach 2003b). As such, the potential for uncovering significant resources during any construction activity is considered remote, given that no such resources have been discovered during past development and that all new development facilitated by the HEU would occur on previously developed sites (City of Manhattan Beach 2003b).

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would facilitate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. In the unlikely event that new housing accommodated by the HEU would ultimately be constructed on sites containing archeological resources, project level review as required under CEQA would ensure that all impacts to these resources are less than significant. The HEU

would not change or alter policies to protect and/or review archaeological resources and would not cause a substantial adverse change in the significance of archaeological resources. Therefore, impacts would be less than significant, and no mitigation is required.

c) ***Would the project disturb any human remains, including those interred outside of formal cemeteries?***

**Less Than Significant Impact.** Manhattan Beach is virtually built out, and the potential for uncovering significant cultural resources during any construction activity, including the discovery of human remains outside of formal cemeteries, is considered remote (City of Manhattan Beach 2003b). Therefore, it is not expected that human remains would be disturbed as a result of implementation of the HEU. However, the possibility of encountering human remains exists. In the unexpected event that human remains are unearthed during future construction activities facilitated by the HEU, impacts would be potentially significant. In the unlikely event that human remains are inadvertently encountered by future residential development accommodated by the adoption of the HEU, such resources would be treated in accordance with State and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). Project level review, as individual development projects are identified, as required under CEQA would ensure that all impacts to these human remains are less than significant. The HEU would not change or alter policies to protect and/or review historic resources. Therefore, the HEU would not disturb any human remains, impacts would be less than significant, and no mitigation is required.

### 3.5.4 References

- Arroyo Resources. 2018. Historic Resource Identification Form, Local Nomination, 2820 Highland Avenue, Manhattan Beach. [https://cms6ftp.visioninternet.com/manhattanbeach/commissions/planning\\_commission/2018/20180926/20180926-4.pdf](https://cms6ftp.visioninternet.com/manhattanbeach/commissions/planning_commission/2018/20180926/20180926-4.pdf). Accessed November 18, 2021.
- California State Parks. 2021. Office of Historic Preservation (Los Angeles County). Accessed October 30, 2021. [http://ohp.parks.ca.gov/?page\\_id=21427](http://ohp.parks.ca.gov/?page_id=21427)
- City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.
- City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/48342>.
- City of Manhattan Beach. 2014. City of Manhattan Beach Housing Element (2013-2021). [https://www.manhattanbeach.gov/home/showpublisheddocument/16921/635434710882970000?\\_ga=2.267205064.753363365.1629757800-251228080.1629141140](https://www.manhattanbeach.gov/home/showpublisheddocument/16921/635434710882970000?_ga=2.267205064.753363365.1629757800-251228080.1629141140). Accessed October 29, 2021.
- City of Manhattan Beach. 2018. City of Manhattan Beach Mobility Plan. Updated 2018. Accessed October 29, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/36671/636645874385670000>

City of Manhattan Beach. 2019. First Historic Landmark Application—2820 Highland Avenue. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/current-projects-programs/historic-preservation>. Accessed November 18, 2021.

NPS (National Park Service). 1990. National Register Bulletin: How to Apply the National Register Criteria for Evaluation. [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf). Accessed November 17, 2021.

OHP (California State Parks Office of Historic Preservation). 2010. State Historic Resources Commission 2009 Annual Report. <https://ohp.parks.ca.gov/pages/1067/files/2009%20annualreport.pdf>. Accessed November 18, 2021.

## 3.6 Energy

### 3.6.1 Environmental Setting

#### Electricity

According to the U.S. Energy Information Administration (EIA), California used approximately 25,379 gigawatt hours of electricity in 2019 (EIA 2020a). By sector in 2019, commercial uses utilized 46% of the State’s electricity, followed by 35% for residential uses, and 19% for industrial uses. Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building.

Clean Power Alliance (CPA) provides electricity to the City. CPA began operations in 2017, with the City joining in December 2017. CPA serves over three million people and provides 100% Green Energy more than any other electricity provider in the country. Thirty-two communities across Los Angeles and Ventura counties have opted for clean power through CPA. The City of Manhattan Beach homes and businesses transitioned to 100% renewable energy beginning October 2021 (City of Manhattan Beach 2021).

#### Natural Gas

According to the California Energy Commission (CEC), California used approximately 20,748 million therms<sup>11</sup> of natural gas in 2020 (EIA 2020b). The Southern California Gas Company (SoCalGas) provides the City with natural gas service. The territory serviced by SoCalGas encompasses approximately 20,000 square miles and more than 500 communities. In the California Energy Demand mid-energy demand scenario, natural gas demand is projected to have an annual growth rate of 0.03% in SoCalGas’s service territory. As of 2019, approximately 4.2 billion cubic feet per day were used in SoCalGas’s service area per year (California Gas and Electric Utilities 2020). This amount is approximately equivalent to 4.18 billion thousand British thermal units (kBtu) per day or 41.8 million therms per day. Over the course of a year, the available capacity would therefore be 9.1 billion therms per year, which is well above the existing and future anticipated natural gas demand in the area serviced by SoCalGas.

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<sup>11</sup> One therm is equal to 100,000 BTU or 100 kBtu.



## Petroleum

According to the CEC, California used approximately 27.8 billion gallons of petroleum in 2019 (EIA 2020c). This equates to a daily use of approximately 76 million gallons of petroleum. By sector, transportation uses utilize approximately 85.4% of the State's petroleum, followed by 10.9% from industrial, 2.6% from commercial, 1.0% from residential, and 0.01% from electric power uses (EIA 2020c). In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California's March 19, 2020, stay-at-home order resulted in an unprecedented drop in travel across all modes, with an accompanying drop in fuel demand. Demand for gasoline decreased 45% in April 2020 – the lowest demand level since 1968 (CEC 2020).

### 3.6.2 Regulatory Setting

#### Federal

##### Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

##### Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased corporate average fuel economy standards for motor vehicles, the EISA includes the following other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

This federal legislation (the RFS) requires ever-increasing levels of renewable fuels to replace petroleum (EPA 2017). The U.S. Environmental Protection Agency is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

#### State

##### SB 100

SB 100 (2018) increased the standards set forth in SB 350. The bill establishes that 44% of the total electricity sold per year to retail customers in California be secured from qualifying renewable energy sources by December 31, 2024, with that number increasing to 52% by December 31, 2027, and 60% by December 31, 2030. SB 100

states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

### California Building Standards

Part 6 of Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. Part 6 establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Part 6 is updated periodically to incorporate and consider new energy efficiency technologies and methodologies. The 2019 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2020. The 2019 Title 24 Building Energy Efficiency Standards would further reduce energy used and associated GHG emissions compared to prior standards. In general, single-family residences built to the 2019 standards are anticipated to use approximately 7% less energy due to energy efficiency measures than those built to the 2016 standards; once rooftop solar electricity generation is factored in, single-family residences built under the 2019 standards would use approximately 53% less energy than those under the 2016 standards (CEC 2018). Nonresidential buildings built to the 2019 standards are anticipated to use an estimated 30% less energy than those built to the 2016 standards (CEC 2018).

### State Vehicle Standards

In response to the transportation sector accounting for more than half of California's carbon dioxide emissions, AB 1493 was enacted in 2002. Assembly Bill (AB) 1493 required CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined by the State board to be those whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emissions standards for motor vehicles manufactured in 2009 and all subsequent model years. The 2009 through 2012 standards resulted in a reduction in approximately 22% of GHG emissions compared to emissions from the 2002 fleet, and the 2013 through 2016 standards resulted in a reduction of approximately 30%.

In 2012, CARB approved a new emissions-control program for model years 2017 through 2025. The program combines the control of smog, soot, and global-warming gases with requirements for greater numbers of zero-emissions vehicles into a single package of standards called Advanced Clean Cars. By 2025, when the rules would be fully implemented, new automobiles would emit 34% fewer global-warming gases and 75% fewer smog-forming emissions (CARB 2011).

### Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or SB 375, coordinates land use planning, regional transportation plans, and funding priorities to help California meet its GHG emissions reduction mandates. As codified in California Government Code Section 65080, SB 375 requires metropolitan planning organizations (e.g., Southern California Association of Governments) to include a Sustainable Communities Strategy in their regional transportation plan. The main focus of the Sustainable Communities Strategy is to plan for growth in a fashion that will ultimately reduce GHG emissions, but the strategy is also part of a bigger effort to address other development issues, including transit and vehicle miles traveled (VMT), which influence the consumption of petroleum-based fuels.

## Regional/Local

### City of Manhattan Beach General Plan

The following goals and policies related to energy are applicable to the HEU.

Goal CR-5: Conserve and protect the remaining natural resources in Manhattan Beach.

Policy CR-5.1: Employ principles of a sustainable environment in the development, operation, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.

Policy CR-5.3: Encourage water conservation, including landscaping with drought-tolerant plants, use of reclaimed water, and recycling of cooling system water, in all development.

Policy CR-5.5: Support expanded use of reclaimed water.

Policy CR-5.6: Encourage drainage designs which retain or detain stormwater run-off to minimize volume and pollutant concentrations.

Policy CR-5.7: Encourage the use of energy-saving designs and devices in all new construction and reconstruction.

Policy CR-5.8: Encourage utilization of “green” approaches to building design and construction, including use of environmentally friendly interior improvements.

Policy CR-5.10: Encourage and support the use of alternative fuel vehicles, including support of charging or “fueling” facilities.

Policy CR-5.11: Support sustainable building practices.

### 3.6.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact										
<ul style="list-style-type: none"> <li>▪ <b>VI. Energy</b> – Would the project:                             <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;">a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> </li> </ul>					a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>										
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>										

- a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

**Less Than Significant Impact.** Future development envisioned under the HEU would increase the demand for electricity, natural gas, and petroleum during both construction and operations. Energy use during construction associated with new development projects under the HEU is anticipated to be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during the construction of individual projects would be temporary in nature, and equipment used would be typical of construction projects in the region. In addition, construction contractors would be required to demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofiting, repowering, or replacement of heavy-duty diesel on- and off-road equipment.

Construction activities associated with development under the HEU would be required to utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, individual projects would be required to comply with construction waste management practices to recycle 65% of construction and demolition debris per Chapter 5.26 of the City Code (City of Manhattan Beach 2017). Developers would be required to complete the Construction and Demolition Waste Management Plan and Construction Management and Parking Plan forms and use City-approved haulers to remove mixed construction debris.

Long-term operation of new development projects under the HEU would require electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. As previously discussed, given the already built-out nature of the City and lack of substantial vacant land, future residential projects that may be expected to be located on infill sites, which would be already served by energy providers. The HEU would also prioritize future development projects close to high quality transit areas and existing commercial/retail, recreational, and institutional land uses, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. This would help reduce new development projects consumption of petroleum.

New development projects under the HEU would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. CALGreen sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. Future projects built under the HEU would promote energy efficiency and renewable energy through

implementation of General Plan policies such as CR-5.1, CR-5.3, CR-5.7, CR-5.8, and CR-5.10 in addition to HEU Program 13, which encourages energy conservation and energy efficiency, as well as Program 27, which encourages the use of solar panels by providing incentives. These measures would require new construction to have buildings that meet and incorporate energy-saving designs and green building techniques, the promotion of electric vehicle infrastructure, and encourage the use of alternative energy sources such as from solar.

Based on the above information, the HEU would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy and would not be inconsistent with existing energy standards. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

**b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

**Less Than Significant Impact.** Private electrical and natural gas utility companies provide service to customers in the City of Manhattan Beach. Implementation of the HEU could result in new housing that addresses the City's 6<sup>th</sup> Cycle RHNA allocation and the City's policies supporting affordable and workforce housing. The rezoning of the opportunity sites would accommodate high density, infill, and mixed-use development located in an urbanized area. The power exists to these sites due to previous use and/or surrounding urban development. Furthermore, new development projects proposed under the HEU would comply with the most current Title 24 California Building Code/Code of Regulations (2019), CAL Green Code, California Green Building Standards Code, and 2019 energy standards at the time of building construction, as amended by the State of California. Projects would also be required comply with all current Title 24 energy requirements.

In addition to being subject to the aforementioned Statewide regulatory requirements, any future housing accommodated by the HEU would be subject to goals and policies provided in the City's General Plan, particularly Goal CR-5 and associated policies, which require that proposed projects conserve and protect the remaining natural resources of the City. This Goal facilitates the expanded use of renewable energy and efficiency, as required by Policies 5.3 and 5.5 (encouraging water conservation and increased reliance on reclaimed water), and Policies 5.7 and 5.8 (encouraging "green building" practices, and the use of energy saving designs and devices in all new construction and redevelopment). Further, Policy 5.10 (encouraging the use of alternative fuel vehicles including support of charging or "fueling" facilities), would contribute to any additional residents accommodate by the HEU decreasing their dependence of high energy fossil fuels.

During both construction and operation of the future projects would comply with all state regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act, as amended. During construction, all waste generated would be recycled to the maximum extent possible. Therefore, the HEU would not obstruct a State or local plan for renewable energy or energy efficiency and would result in less than significant impacts associated with energy.

### 3.6.4 References

- California Gas and Electric Utilities (Southern California Gas Company, Pacific Gas & Electric Company, San Diego Gas & Electric Company, Southwest Gas Corporation, City of Long Beach Gas & Oil Department, and Southern California Edison Company). 2020. *2020 California Gas Report*. 2020. Accessed October 28, 2021. [https://www.socalgas.com/sites/default/files/2020-10/2020\\_California\\_Gas\\_Report\\_Joint\\_Utility\\_Biennial\\_Comprehensive\\_Filing.pdf](https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf).
- CARB (California Air Resources Board). 2011. "Facts About the Advanced Clean Cars Program." Revised November 9, 2011. Accessed February 2019. [https://www.arb.ca.gov/msprog/zevprog/factsheets/advanced\\_clean\\_cars\\_eng.pdf](https://www.arb.ca.gov/msprog/zevprog/factsheets/advanced_clean_cars_eng.pdf).
- CEC (California Energy Commission). 2018. 2019 Building Energy Efficiency Standards – Frequently Asked Questions. March 2018. Accessed May 2019. [https://www.energy.ca.gov/sites/default/files/2020-03/Title\\_24\\_2019\\_Building\\_Standards\\_FAQ\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf).
- CEC. 2020. 2020 Integrated Energy Policy Report. CEC-100-2020-001-V1-CMF. March 23, 2021. Accessed October 2021. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update>.
- City of Manhattan Beach. 2017. City of Manhattan Beach Code of Ordinances, Chapter 5.26 Construction and Demolition Debris Waste Reduction and Recycling Requirements.
- City of Manhattan Beach. 2021. Press Release: Manhattan Beach Powered by 100Percent Green, Renewable Energy.
- EIA. 2020a. "State Electricity Profiles – California Electricity Profile 201p". November 2, 2020. Accessed October 2019. <https://www.eia.gov/electricity/state/california/index.php>.
- EIA. 2020b. "Natural Gas Consumption by End Use." Accessed October 2021. [https://www.eia.gov/dnav/ng/ng\\_cons\\_sum\\_a\\_EPGO\\_VCO\\_mmcf\\_a.htm](https://www.eia.gov/dnav/ng/ng_cons_sum_a_EPGO_VCO_mmcf_a.htm).
- EIA. 2020c. "California State Profile and Energy Estimates – Table F16: Total Petroleum Consumption Estimates, 2017." Accessed October 2021. [https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep\\_fuel/html/fuel\\_use\\_pa.html&sid=US&sid=CA](https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA).
- EPA. 2017. "Overview for Renewable Fuel Standard." Last updated June 7, 2017. Accessed February 2019. <https://www.epa.gov/renewable-fuel-standard-program/overview-renewable-fuel-standard>.

## 3.7 Geology and Soils

### 3.7.1 Environmental Setting

#### Topography

Topographically, the City consists of a variety of slopes and level surfaces. Elevations within the City range from sea level at the ocean to 240 feet in the southern neighborhoods. The land adjacent to the beaches slopes up, reflecting the sand dunes that used to encompass this area of the City and creating a shallow ridge, while the remaining properties have subtle slopes (City of Manhattan Beach 2003a).

#### Soils

Manhattan Beach lies within the Los Angeles Basin geological region (City of Manhattan Beach 2003a). Geologic formations underlying the city consist largely of nonmarine (inland) and marine (coastal) alluvial lake, playa, and terrace deposits, which are characterized by sandy and clay-like soils (CGS 2010, City of Manhattan Beach 2003a). These types of soils present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a).

#### Seismic Hazards

##### Active Faults

Areas with seismic (earthquake) hazards are identified by earthquake fault zones as established by the Alquist-Priolo Earthquake Fault Zone Act of 1972. The California Geological Survey (CGS; formerly the California Division of Mines and Geology [CDMG]) classifies faults as active, potentially active, or inactive according to standards developed for implementation of the Alquist-Priolo Earthquake Fault Zone Act. A fault that has exhibited surface displacement within the Holocene Epoch (the last 11,000 years) is defined as active. A fault that has exhibited surface displacement during Quaternary time (i.e., within the past 1.6 million years) but that cannot be proven to have moved or not moved during Holocene time is defined as potentially active. According to the City's General Plan (2003) there are no known active Alquist-Priolo Earthquake Fault Zones in the City, however, the City does lie directly above a known thrust fault,<sup>12</sup> and is less than 50-miles away from the San Andreas Fault, a 400-mile northwest-southeast running fault capable of producing earthquakes with a magnitude of 8 or greater on the Richter scale (City of Manhattan Beach 2003b). Numerous other fault lines have been identified in Southern California that could also have a significant impact on Manhattan Beach. These faults include Newport-Inglewood, Whittier, Chatsworth, Hollywood, Los Alamitos, and Palos Verdes (City of Manhattan Beach 2003b).

##### Surface Fault Ruptures

Surface rupture involves the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. Surface rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (earthquake hypocenter) is shallow. The Alquist-

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<sup>12</sup> The Compton Thrust Fault does not rupture all the way up to the surface; it is "buried" under the uppermost layers of rock in the earth's crust (City of Manhattan Beach 2003a) This type of fault is not recognized on the Seismic Hazard Zone Map as a fault hazard zone (CDOC 2021).

Priolo Earthquake Fault Zoning Act of 1972 (the Act) regulates development near Holocene-active faults to address the hazard of surface fault rupture. This Act requires the State Geologist to establish regulatory zones (known as Alquist-Priolo Special Study Fault Zones) around the surface traces of Holocene-active faults and to issue appropriate maps (CGS 2018). The City is not located within an Alquist-Priolo Earthquake Fault Zone (City of Manhattan Beach 2003a, 2003b, CGS 2021). As such, the potential for surface rupture due to fault displacement beneath the City is considered very low (City of Manhattan Beach 2003b).

### Groundshaking

Groundshaking (or seismic shaking) caused by fault movement during an earthquake has the potential to result in the damage or destruction of buildings, infrastructure, and possible injury or loss of life. Groundshaking may occur as a result of movement along a fault located within the city or along a more distant fault. The intensity of groundshaking in a particular area is dependent on several factors, including the earthquake magnitude, the distance from the epicenter, the duration of strong ground motion, local geologic conditions, and the fundamental period of the structure. Groundshaking can also trigger secondary seismic phenomena, such as liquefaction, lateral spreading, seismically induced settlement and slope instability, tsunami and seiche, and other forms of ground rupture and seismic responses. Manhattan Beach is subject to ground shaking in the event of a major seismic event, as is most of Southern California (City of Manhattan Beach 2003a).

### Liquefaction

Liquefaction is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking. Soils transform from a solid to a liquid state as a result of rapid loss of shear strength and increased pore water pressure induced by earthquake vibrations. According to the Seismic Hazard Zones Map, Venice Quadrangle, an area where liquefaction has occurred, or conditions indicate a potential occurrence within Manhattan Beach is limited to a strip of coastal sands along the ocean (City of Manhattan Beach 2003a). None of the existing or potential parcels identified as having the capacity to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation are located on a liquefaction hazard zone (CDOC 2021).

### Landslide Hazards

Landslides are fast, downward movement of earth and rock materials. Some landslides are caused by the infiltration of water into unstable material. Other landslides are earthquake-induced landslides consisting of rock falls and debris flow. Areas with the potential for earthquake-induced landslides generally occur in areas of previous landslide movement, or where topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacement. Manhattan Beach lies within the Los Angeles Basin geological region and is underlain with deposits characterized by sand and clay-like soils. These soil types present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a). The Seismic Hazard Zones Map, Venice Quadrangle, identifies a small portion of land in the northwest corner of the city that experienced previous landslide movement or local conditions indicate a potential ground displacement occurrence. (City of Manhattan Beach 2003a), however, the areas identified in the sites analysis as having the potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation are not underlain by a landslide hazard zone (CDOC 2021).



## 3.7.2 Regulatory Setting

### Federal

#### Earthquake Hazards Reduction Act

In October 1977, the U.S. Congress passed the Earthquake Hazards Reduction Act to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this goal, the act established the National Earthquake Hazards Reduction Program. This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act, which refined the description of agency responsibilities, program goals, and objectives.

The mission of the National Earthquake Hazards Reduction Program includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improved building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improved mitigation capacity; and accelerated application of research results. The National Earthquake Hazards Reduction Program Act designates the Federal Emergency Management Agency as the lead agency of the program and assigns several planning, coordinating, and reporting responsibilities. Other National Earthquake Hazards Reduction Program Act agencies include the National Institute of Standards and Technology, National Science Foundation, and the U.S. Geological Survey.

### State

#### Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Act (California Public Resources Code [PRC] Sections 2621–2630) was passed in 1972 to mitigate the hazard of surface faulting to structures designed for human occupancy. The main purpose of the law is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. The Alquist-Priolo Act requires the State Geologist to establish regulatory zones known as Earthquake Fault Zones around the surface traces of active faults and to issue appropriate maps. The maps are distributed to all affected cities, counties, and state agencies for their use in planning efforts. Before a project can be permitted in a designated Alquist-Priolo Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults.

The Alquist-Priolo Act also requires the State Geologist to compile maps delineating earthquake fault zones and to submit maps to all affected cities, counties and state agencies for review and comment. As referenced in Threshold a(i) of Section 3.1.3, Environmental Impacts, Special Publication 42 has been the vehicle by which the State Geologist, through the California Geological Survey (previously the Division of Mines and Geology), has informed affected agencies. The objectives of Special Publication 42 include:

1. To promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Alquist-Priolo Earthquake Fault Zoning Act.
2. To assist affected parties in the evaluation and mitigation of surface fault rupture hazard for projects within designated Earthquake Fault Zone

Maps utilized in this ND to determine earthquake fault and liquefaction zones are digitized and georeferenced versions of the maps provided in Special Publication 42 (Revised 2018).

### Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC Sections 2690–2699.6) addresses earthquake hazards from non-surface fault rupture, including liquefaction and seismically induced landslides. The act established a mapping program for areas that have the potential for liquefaction, landslide, strong ground shaking, or other earthquake and geologic hazards. The act also specifies that the lead agency for a project may withhold development permits until geologic or soils investigations are conducted for specific sites and mitigation measures are incorporated into plans to reduce hazards associated with seismicity and unstable soils.

### National Pollutant Discharge Elimination System Permit

In California, the State Water Resources Control Board administers regulations promulgated by the U.S. Environmental Protection Agency (55 Code of Federal Regulations [CFR] 47990), requiring the permitting of stormwater-generated pollution under the National Pollutant Discharge Elimination System (NPDES). In turn, the State Water Resources Control Board's jurisdiction is administered through nine Regional Water Quality Control Boards. Under these federal regulations, an operator must obtain a General Construction Permit through the NPDES Stormwater Program for all construction activities with ground disturbance of one acre or more. The General Construction Permit requires the implementation of best management practices (BMPs) to reduce sedimentation into surface waters and to control erosion. One element of compliance with the NPDES permit is preparation of a Stormwater Pollution Prevention Plan (SWPPP) that addresses control of water pollution, including sediment, in runoff during construction. The Manhattan Beach Public Works Department enforces NPDES requirements, which are adopted as part of the MBMC.

### California Building Standards Code

The California Building Code (CBC) has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or those standards are not enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability, by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. As indicated previously, the CBC is updated and revised every 3 years. The 2019 version of the CBC became effective January 1, 2020. It is anticipated that the HEU would use the most current CBC at the time of building permit issuance. The 2019 edition of the CBC is based on the 2018 International Building Code, published by the International Code Conference.

Chapters 16 and 16A of the 2019 CBC include structural design requirements governing seismically resistant construction, including factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Chapters 18 and 18A include the requirements for foundation and geotechnical soil investigations, and geohazard reports (Section 1803A); excavation, grading, and fill (Section 1804A); damp-proofing and water-proofing (Section 1805A); allowable load-bearing values of soils (Section 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Section 1807A); foundations (Section 1808A); and design of shallow foundations (Section 1809A) and deep foundations (Section 1810A). Chapter 33 of the 2019 CBC includes requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304).

Construction activities are subject to occupational safety standards for excavation and trenching, as specified in the California Safety and Health Administration regulations (CCR Title 8) and in Chapter 33 of the CBC. These regulations specify the measures to be used for excavation and trench work where workers could be exposed to unstable soil conditions. Any future development accommodated as a result of approval and implementation of the HEU would be required to employ these safety measures during excavation and trenching.

## **California Environmental Quality Act**

### Paleontological Resources

The CEQA Guidelines require that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to paleontological resources. Paleontological resources, which are limited, nonrenewable resources of scientific, cultural, and educational value, are recognized as part of the environment under these state guidelines. This study satisfies project requirements in accordance with CEQA (13 PRC, 2100 et seq.) and Public Resources Code Section 5097.5 (Stats 1965, c 1136, p. 2792). This analysis also complies with guidelines and significance criteria specified by the Society for Vertebrate Paleontology (SVP 2010).

Paleontological resources are explicitly afforded protection by CEQA, specifically in Section VII(f) of CEQA Guidelines Appendix G, the “Environmental Checklist Form,” which addresses the potential for adverse impacts to “unique paleontological resource[s] or site[s] or ... unique geological feature[s].” This provision covers fossils of signal importance – remains of species or genera new to science, for example, or fossils exhibiting features not previously recognized for a given animal group – as well as localities that yield fossils significant in their abundance, diversity, preservation, and so forth. Further, CEQA provides that generally, a resource shall be considered “historically significant” if it has yielded or may be likely to yield information important in prehistory (PRC 15064.5 [a][3][D]). Paleontological resources would fall within this category. The PRC, Chapter 1.7, sections 5097.5 and 30244 also regulates removal of paleontological resources from state lands, defines unauthorized removal of fossil resources as a misdemeanor, and requires mitigation of disturbed sites.

## **Regional and Local**

### City of Manhattan Beach General Plan

The Community Safety Element of the General Plan recognizes that seismic and geologic hazards present a variety of risks to the residents of the City. Goals and policies applicable to geology and soils include:

Goal CS-1: Minimize the risks to public health, safety, and welfare resulting from natural and human caused hazards.

Policy CS-1.4: Minimize the potential damage to structures and loss of life that may result from an earthquake.

Policy CS-1.5: Require that new developments minimize stormwater and urban runoff into drainage facilities by incorporating design features such as detention basins, on-site water features, or other strategies”

Policy CS-1.8: Participate in Federal, State, and local earthquake preparedness and emergency response programs.

Goal CS-3: Maintain a high level of City emergency response services

Policy CS-3.1: Support the continued active enforcement of the building and fire code.

Policy CS-3.3: Inform all residents of the requirements for visible and clearly legible street numbers to minimize the response time of emergency personnel.

Policy CS-3.4 Ensure that street signs are legible and easy to find by both emergency response personnel and the general public.

Policy CS-3.5: Review the City's emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.6: Review the location, size, and equipment at each designated emergency shelter periodically to ensure that the City will be able to accommodate all people likely to need shelter in the event of a disaster.

Policy CS-3.7: Support the use of the best available equipment and facilities to ensure safety that meets the changing needs of the community.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Policy CS-3.10: Strive to reduce emergency response time

## Manhattan Beach Municipal Code

### Section 5.36.130, Connection to sewers where provided mandatory

In accordance with Section 5.36.130, any development proposed in the vicinity of the public sewer system is prohibited from constructing, maintaining, or using a cesspool, septic tank, or any other means of disposal of sewage on any premises in the City. At this time, public sanitary sewer connections would be available and required for any development accommodated as a result of HEU implementation.

## Title 9, Building Regulations

### Chapter 9.01, Building Code

The Building Code for the City includes Section 9.01.010, Adoption of the 2019 California Building Code (CBC), which incorporates by reference the rules, regulations, provisions, and conditions set forth in the 2019 CBC, including the Appendices F, J, and O and Standards (including Chapter/Section 1, Division 2; Chapter 31B and excluding all other Appendices). The California Building Code, together with provisions set forth in Chapter 9.01 of the MBMC would apply to the construction, alteration, improvements, enlargement, replacement, demolition, or conversion of any buildings or structures in the within the City.

Section 9.01.110, General Structural Design Provisions, of this chapter requires minimum standards for structural seismic resistance established primarily to reduce the risk of life loss or injury. This section also requires site-specific stability studies for hillside development.

#### Chapter 9.03, Residential Code

The Residential Code for the City includes Section 9.03.010, Adoption of California Residential Code (CRC), which incorporates by reference the rules, regulations, provisions, and conditions set forth in the 2019 CRC, including Chapter 1, Division 2 and Appendices J, K, Q, T, and V.

### Title 10, Planning and Zoning

#### Section 10.80.010 – Building, grading, and demolition permits

In accordance with Section 10.80.101, no building, grading, or demolition permit would be issued to any HEU unless the City's Director of Community Development determined that each new or expanded use or structure complied with all of the requirements set forth in the MBMC, including, by reference, provisions and requirements of both the CBC and CRC.

### Title 11, Subdivisions

Title 11 regulates and controls the design and improvement of subdivisions, including residential subdivisions, and ensures consistency with the City's General Plan.

#### Section 11.20.120, Soils/geology report.

The requirements set forth by Section 11.20.120 of Title 11 are as follows:

- A. The applicant shall submit a preliminary soils and/or geology report, prepared by a civil engineer and/or geologist, registered in the State, based upon adequate test borings, for every subdivision for which a final map is required. The preliminary soils and/or geology report shall be submitted to the City Engineer for review. The City Engineer may require additional information or reject the report if it is found to be incomplete, inaccurate or unsatisfactory. The preliminary soils and/or geology report may be waived if the City Engineer finds that sufficient knowledge exists as to the soils qualities of the soils of the subdivision.
- B. In the event the preliminary soils report indicates the presence of critically expansive soils, or other soils problems which, if not corrected, could lead to structural defects, a soils investigation of each lot or parcel in the subdivision shall be required and must be performed by a civil engineer registered in the State who shall recommend the corrective action which is likely to prevent structural damage to each structure proposed to be constructed in the area where such soils problem exists.
- C. In the event the preliminary soils report indicates the presence of rocks or liquids containing deleterious chemicals which, if not corrected, could cause construction materials such as concrete, steel, and ductile or cast iron to corrode or deteriorate, a soils investigation of each potentially affected lot or parcel in the subdivision shall be required and must be performed by a civil engineer registered in the State who shall recommend the corrective action which is likely to prevent structural damage to each structure proposed to be constructed in the area where such soils problem exists.

- D. The subdivision or any portion thereof where such soils problems exist may be approved if it is determined that the recommended action is likely to prevent structural damage to each structure to be constructed and that the issuance of any building permit shall be conditioned to include this recommended action in connection with the construction of each structure involved.
- E. A note shall be placed on the final map stating that a geology and/or soils report has been prepared in conjunction with the subdivision or stating that the geological and/or soils report has been waived pursuant to subsection A of this section. This section requires submission of a preliminary soils and/or geology report, prepared by a civil engineer and/or geologist, registered in the state, based upon adequate test borings, for every subdivision for which a final map is required. This requirement is set forth in order to prevent structural damage to any proposed occupied structure(s) due to seismic activities, including ground shaking, landslides, and/or liquefaction.

### 3.7.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS – Would the project:</b>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less Than Significant Impact.** The City is not located within an Alquist-Priolo Earthquake Fault Zone (City of Manhattan Beach 2003a, 2003b. CGS 2010); however, the City does lie directly above a known thrust fault and is less than 50-miles away from the San Andreas Fault. As the thrust fault is buried under the uppermost layers of rocks in the earth’s crust, the potential to directly or indirectly cause or exacerbate existing fault rupture risks within the City is considered very low (City of Manhattan Beach 2003b). Continued compliance with existing building codes and standards, including the MBMC requirement for proposed development projects to prepare a geotechnical report and/or soils investigation (Section 11.20.120), would be required. Therefore, the HEU would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City’s 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas and would not alter any local, regional, State, or Federal geological protection standards, nor would the HEU alter the City’s existing policies or ordinances protecting or establishing building code standards or seismic safety requirements. The HEU does not directly or indirectly the risk of loss, injury or death due to the rupture of a known earthquake fault. Therefore, impacts would be less than significant, and no mitigation is required.

ii) ***Strong seismic ground shaking?***

**Less Than Significant Impact.** Manhattan Beach is subject to ground shaking in the event of a seismic event, as is most of Southern California. However, continued compliance with Community Safety Element policies, as well as existing building codes and standards, including those outlined in the CBC and MBMC, would ensure that impacts from ground shaking will be minimized (City of Manhattan Beach 2003a). Therefore, the HEU would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas and would not alter any local, regional, State, or Federal geological protection standards, nor would the HEU alter the City's existing policies or ordinances protecting or establishing building code standards or seismic safety requirements. The HEU does not directly or indirectly the risk of loss, injury or death due to the ground shaking. Therefore, impacts would be less than significant, and no mitigation is required.

iii) ***Seismic-related ground failure, including liquefaction?***

**Less Than Significant Impact.** According to the Seismic Hazard Zones Map, Venice Quadrangle, an area where liquefaction has occurred or conditions indicate a potential occurrence within the City is limited to a strip of coastal sands along the ocean, where no habitable structures are permitted (City of Manhattan Beach 2003a). As such, the HEU does not directly or indirectly result in loss, injury or death due to seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant, and no mitigation is required.

iv) ***Landslides?***

**Less Than Significant Impact.** The soils underlying the City present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a). While there are a few scattered pockets of landslide prone areas within the City (CGS 2010), none underlie any sites identified in the HEU as being appropriate to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation, therefore future development would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

b) ***Would the project result in substantial soil erosion or the loss of topsoil?***

**Less Than Significant Impact.** The HEU does not propose specific development plans for new residential dwelling units at this time. Therefore, components associated with future development efforts resulting from the additional capacity accommodated for by the HEU—such as amount of grading, excavation, vegetation removal, etc.—are currently unknown. If a future project proposes to disturb more than one acre of soils, it is required to prepare a SWPPP, which includes BMPs for erosion and sedimentation control. BMP examples



generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, gravel bags, etc. Existing vegetation should be preserved as much as possible. Future development of units that is facilitated by adoption of the HEU would be subject to these conditions for a construction permit, even under conditions of streamlined development.

- c) ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

**Less Than Significant Impact.** Manhattan Beach lies within the Los Angeles Basin geological region (City of Manhattan Beach 2003a). Geologic formations underlying the City consist largely of alluvial deposits, which are characterized by sandy and clay-like soils (CGS 2010, City of Manhattan Beach 2003a). These types of soils present a low level of risk in terms of landslides or slope failure (City of Manhattan Beach 2003a). The City is not underlain by a known liquefaction or landslide hazards zone (CDOC 2021). The HEU would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the HEU and would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Therefore, impacts due to unstable geological units or soils would be less than significant, and no mitigation is required.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

**Less Than Significant Impact.** For all future development accommodated as a result of implementation of the HEU, existing Municipal and Building Code requirements would be applied to regulate building quality and structural integrity. In addition, the soils underlying the City have low to very low expansion potential (UC Davis 2012, USDA 2021). As such, there would not be a substantial direct or indirect risk to life or property related to the shrinking and swelling of soils supporting buildings, roads, and other infrastructure.

Implementation of the programs contained in the document would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Although implementation of the programs contained in the HEU would facilitate residential development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, any proposed land use changes would follow the adoption of the proposed HEU and would be subject to future environmental review, as required under CEQA once sufficient information is made available. All future projects would be required to adhere to relevant development standards and design guidelines contained in the Planning and Zoning Ordinance and other applicable regulatory requirements governing the nature and quality of development within the City. Therefore, impacts from expansive soils would be less than significant, and no mitigation is required.

- e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

**No Impact.** In accordance with Section 5.36.130, any development proposed in the vicinity of the public sewer system is prohibited from constructing, maintaining, or using a cesspool, septic tank, or any other means of disposal of sewage on any premises in the City. At this time, public sanitary sewer connections would be available and required for any development accommodated as a result of HEU implementation. As such, no septic tanks would be permitted, and no impacts would occur.

f) **Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact.** The City is virtually built out and does not contain any known paleontological resources (City of Manhattan Beach 2003b). As such, the potential for uncovering significant resources during any construction activity is considered remote, given that no such resources have been discovered during past development and that all new development facilitated by the HEU would occur on previously developed sites. As such, the HEU would result in less than significant impacts associated with unique paleontological or geological resources, and no mitigation is required.

### 3.7.4 References

- CGS (California Geological Survey). 2010. Geologic Map of California. Accessed October 29, 2021. [https://ngmdb.usgs.gov/ngm-bin/pdp/zui\\_viewer.pl?id=28737](https://ngmdb.usgs.gov/ngm-bin/pdp/zui_viewer.pl?id=28737).
- CGS. 2018. Earthquake Fault Zones, A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California. Revised 2018. Accessed October 27, 2021. [https://www.conservation.ca.gov/cgs/Documents/SP\\_042.pdf](https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf).
- CDOC (California Department of Conservation). 2021. Earthquake Hazards Zone Application. Accessed October 30, 2021. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.
- California State Parks. 2021. Office of Historic Preservation (Los Angeles County). Accessed October 30, 2021. [http://ohp.parks.ca.gov/?page\\_id=21427](http://ohp.parks.ca.gov/?page_id=21427)
- City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.
- City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.
- USDA (United States Department of Agriculture). 2021. Web Soil Survey. Area of Interest CA696. Accessed October 2, 2021. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.
- UC Davis (University of California, Davis). 2021. Linear Extensibility Percent. Accessed October 2, 2021. <https://casoilresource.lawr.ucdavis.edu/gmap/help/defn-linear-extensibility.html>.

## 3.8 Greenhouse Gas Emissions

### 3.8.1 Environmental Setting

Climate change refers to any significant change in measures of climate (e.g., temperature, precipitation, or wind patterns) lasting for an extended period of time (i.e., decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and buildup of heat in the atmosphere

near the Earth's surface (the troposphere). The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5).

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare each GHG's ability to trap heat in the atmosphere relative to another gas. The reference gas used is CO<sub>2</sub>; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO<sub>2</sub> equivalent (CO<sub>2</sub>e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH<sub>4</sub> is 25 (i.e., emissions of 1 MT of CH<sub>4</sub> are equivalent to emissions of 25 MT of CO<sub>2</sub>), and the GWP for N<sub>2</sub>O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

## 3.8.2 Regulatory Setting

### Federal

#### Clean Air Act

There is currently no federal overarching law specifically related to climate change or reductions in GHG emissions. However, under the Obama administration, the EPA had been developing regulations under the Clean Air Act that seek to reduce GHG emissions. The regulations cover GHG emissions from sources such as motor vehicles, transportation fuels, new and existing power plants, the oil and gas sector, and municipal landfills. EPA also adopted a Mandatory Reporting Rule and Clean Power Plan in August 2015. Under the Clean Power Plan, EPA issued regulations to control CO<sub>2</sub> emissions from new and existing coal-fired power plants. Previously, in May 2010, EPA set GHG emission thresholds to define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. As discussed below, the EPA and the National Highway Traffic Safety Administration (NHTSA) work in coordination to enable the production of clean vehicles through GHG emission reductions and improved fuel use.

#### Federal Vehicle Standards

The EPA and National Highway Traffic Safety Administration (NHTSA) announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016 (April 2010) that is intended to reduce GHG emissions and improve fuel economy. The EPA approved the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA approved Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act (75 FR 25324–25728), which became effective on July 6, 2010 (75 FR 25324–25728). In August 2018, EPA and NHTSA proposed to amend certain fuel economy and

GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. The 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2–3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1000th of 1 °C by 2100 (EPA and NHTSA 2018).

On September 27, 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (84 FR 51310), which became effective November 26, 2019. The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the EPA and NHTSA issued the Part Two Rule, which sets CO<sub>2</sub> emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026. On January 20, 2021, President Joe Biden issued an EO on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, which includes review of Part One Rule by April 2021 and review of the Part Two Rule by July 2021 (The White House 2021).

## State

### EO S-3-05

EO S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80% below 1990 levels by 2050.

### AB 32

In furtherance of the goals established in EO S-3-05, the Legislature enacted AB 32 (Núñez and Pavley). The bill is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California’s GHG emissions at 1990 levels by 2020, and initiate the transformations required to achieve the state’s long-range climate objectives.

One specific requirement of AB 32 is for CARB to prepare a “scoping plan” for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code Section 38561(a)), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan: *The Climate Change Proposed Scoping Plan: A Framework for Change* (Scoping Plan).

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update (Second Update)* (CARB 2017). The Scoping Plan recommends strategies for implementation at the Statewide level to meet the goals of AB 32, SB 32, and the EOs; it also establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions. A project is considered consistent with the statutes and EOs if it meets the general policies in reducing GHG emissions in order to facilitate the achievement of the State’s goals and does not impede attainment of those goals. As discussed in several cases, a given project need not be in perfect conformity with each and every planning policy or goal to be consistent. A project would be consistent if it will further the objectives and not obstruct their attainment.

### SB 32 and AB 197

SB 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three

members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the State's climate policies. AB 197 also added two members of the Legislature to the CARB Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

#### Title 24, Part 6

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25406[b][1]). The 2019 Title 24 standards are the currently applicable building energy efficiency standards and became effective on January 1, 2020. The 2019 Title 24 Building Energy Efficiency Standards further reduce energy used and associated GHG emissions compared to prior standards.

#### Title 24, Part 11

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as California's Green Building Standards (CALGreen) and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals.

#### State Vehicle Standards (AB 1493 and EO B-16-12)

AB 1493 (July 2002) was enacted in a response to the transportation sector accounting for more than half of California's CO<sub>2</sub> emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of zero-emissions vehicles. It ordered CARB, CEC, California Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve benchmark goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050.

## Advanced Clean Cars Program and Zero-Emissions Vehicle Program

The Advanced Clean Cars Program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025, cars will emit 75% less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the EPA and the NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The Zero-Emissions Vehicle Program will act as the focused technology of the Advanced Clean Cars Program by requiring manufacturers to produce increasing numbers of zero-emissions vehicles and plug-in hybrid electric vehicles in the 2018 to 2025 model years.

## Regional/Local

### South Coast Air Quality Management District

Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008). The SCAQMD has recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects; however, these thresholds were not adopted.

### City of Manhattan Beach General Plan

The following goals and policies related to GHG emissions are applicable to the HEU.

Goal I-12: Protect the quality of the environment by managing the solid waste generated in the community.

Policy CR-12.3: Encourage the maximum diversion of construction and demolition materials.

Goal CR-5: Conserve and protect the remaining natural resources in Manhattan Beach.

Policy CR-5.1: Employ principles of a sustainable environment in the development, operation, and maintenance of the community, emphasizing the importance of respecting and conserving the natural resources.

Policy CR-5.3: Encourage water conservation, including landscaping with drought-tolerant plants, use of reclaimed water, and recycling of cooling system water, in all development.

Policy CR-5.5: Support expanded use of reclaimed water.

Policy CR-5.6: Encourage drainage designs which retain or detain stormwater run-off to minimize volume and pollutant concentrations.

Policy CR-5.7: Encourage the use of energy-saving designs and devices in all new construction and reconstruction.

Policy CR-5.8: Encourage utilization of “green” approaches to building design and construction, including use of environmentally friendly interior improvements.

Policy CR-5.10: Encourage and support the use of alternative fuel vehicles, including support of charging or “fueling” facilities.

Policy CR-5.11: Support sustainable building practices.

Goal CR-6: Improve air quality.

Policy CR-6.1: Encourage alternative modes of transportation, such as walking, biking, and public transportation, to reduce emissions associated with automobile use.

Policy CR-6.4: Cooperate and participate in regional air quality management planning, programs, and enforcement measures.

### Climate Action Plan

The City of Manhattan Beach and the South Bay Cities Council of Governments published the City of Manhattan Beach Climate Action Plan (CAP) in 2017, which established goals and policies that incorporate GHG reduction measures into community and municipal operations. The CAP included 2005 and 2012 inventories of community and municipal GHG emissions and set GHG reduction targets of 15% below 2005 levels by 2020 and 49% below 2005 levels by 2035. The CAP contains goals and measures that cover sectors such as land use and transportation, energy efficiency, solid waste, urban greening, and energy generation and storage (City of Manhattan Beach 2017). However, the CAP did not undergo CEQA review and was not adopted in a public process and is created to help develop a Qualified Climate Reduction Strategy under CEQA. Therefore, the CAP is not a qualified GHG reduction plan as defined in CEQA Guidelines Section 15183.5. Additionally, the City is in the process of creating a Climate Action and Adaptation Plan, which will build on the existing CAP.

### 3.8.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS</b> – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

**Less Than Significant Impact.** The HEU is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce greenhouse gas emissions. Implementation of the programs contained in the document would accommodate development required to meet the City’s 6<sup>th</sup> Cycle RHNA allocation. Future development of residential dwelling units under the HEU could result in an increase in GHG emissions during construction which are primarily associated with use of off-road construction equipment, vendor trucks, and worker vehicles, and operational activities, which includes motor vehicle trips, landscape maintenance equipment operation, energy use (natural gas and generation of electricity consumed by a proposed development project), solid waste disposal, and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. However, future development must be consistent with the General Plan and with regional plans that are based on the land use pattern of the General Plan.

Furthermore, future development as a result of the HEU would occur in developed areas of the City where public services and infrastructure are currently provided. Existing regulations that would apply to any future residential development, including the California Green Building Standards Code and California’s Title 24 Building Energy Efficiency Standards, would substantially reduce GHG emissions associated with future projects. Given the already built-out nature of the City and lack of substantial vacant land, future residential projects that may be developed to meet the RHNA requirement are expected to be located on infill sites where pedestrian- and transit-oriented development is highly feasible and would be encouraged. Such development should reduce the number of new vehicle trips typically associated with residential projects and, thus, would help reduce GHG production resulting from the combustion of fossil fuels for transportation purposes. Because specific project details are not known at this time, the City cannot assess the specific impacts of development in qualitative terms. Any impacts identified for an individual project built under the HEU would be addressed through the project approval process, including design review, environmental review, and mitigation measures specific to any impacts determined to be potential for that project.

Goals and policies from the General Plan Community Resources Element, as presented above, are designed to help reduce GHG emissions in a wide range of actions. As stated earlier the City is also working on the development of a Climate Action and Adaptation Plan that will contain actionable programs to help with GHG reductions in a variety of sectors. Development under the HEU will also have electricity provided by CPA, which would provide 100% renewable energy to all residents within the City, thus reducing GHG emissions. The Housing Element Update also includes policies that would help reduce future projects



energy consumption such as Program 13, which encourages energy conservation and energy efficiency, as well as Program 27, which encourages the use of solar panels by providing incentives. These measures would require new construction to have buildings that meet incorporate energy-saving designs and green building techniques, the promotion of electric vehicle infrastructure, and encourage the use of alternative energy sources such as from solar.

Based on the above information, the HEU would result in less than significant impacts associated with GHG emissions. No mitigation required.

b) ***Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

**Less Than Significant Impact.** The HEU does not propose specific development plans for new residential dwelling units at this time. As previously discussed, future development built under the HEU would likely generate GHG emissions during construction through the use of petroleum-fueled construction equipment and worker vehicle trips to and from construction sites while the operation of future developments would likely generate GHG emissions through the use of electricity and natural gas, vehicle trips of occupants, waste generation, water use, and wastewater generation. In addition, project components (e.g., VMT) for future residential dwelling units is unknown. However, impacts to GHG emissions related to the accommodation of an additional 479 dwelling units would largely be addressed via required discretionary CEQA review of the pending rezoning effort(s), which would incorporate mitigation measures specific to any impacts determined to be significant. Future development of residential units that is facilitated by adoption of the HEU would be subject to all State and local regulations (e.g., Climate Action and Adaptation Plan) regarding GHG emissions. Therefore, the HEU is consistent with applicable plans, policies, or regulations aimed at reducing such GHG emissions, any impacts would be less than significant, and no mitigation is required.

### 3.8.4 References

- CAPCOA (California Air Pollution Control Officers Association). 2008. *CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008.
- CARB. 2012. California Air Resources Board Approves Advanced Clean Car Rules. January 27. <https://www.arb.ca.gov/newsrel/newsrelease.php?id=282>.
- CARB. 2017. The 2017 Climate Change Scoping Plan Update. January 20. Accessed January 2017. [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_pp\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf).
- CEC (California Energy Commission). 2018. *2019 Building Energy Efficiency Standards*. Accessed November 2019. [https://www.energy.ca.gov/sites/default/files/2020-03/Title\\_24\\_2019\\_Building\\_Standards\\_FAQ\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf).
- City of Manhattan Beach. 2017. Climate Action Plan. Accessed October 2021.

EPA. 2017. *Carbon Pollution Standards for Cars and Light Trucks to Remain Unchanged Through 2025*. January 13, 2017. <https://www.epa.gov/newsreleases/carbon-pollution-standards-cars-and-light-trucks-remain-unchanged-through-2025>.

EPA and NHTSA (U.S. Environmental Protection Agency and Department of Transportation's National Highway Traffic Safety Administration). 2016. EPA and NHTSA Adopt Standards to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond. August 2016. <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P7NL.PDF?Dockey=P100P7NL.PDF>.

EPA and NHTSA. 2018. The Safer Affordable Fuel-Efficient 'SAFE' Vehicles Rule for Model Years 2021-2026 Passenger Vehicles and Light Trucks. Proposed Rule August 2018. Accessed May 2019. <https://www.govinfo.gov/content/pkg/FR-2018-08-24/pdf/2018-16820.pdf>.

IPCC (Intergovernmental Panel on Climate Change). 2007. *IPCC Fourth Assessment Synthesis of Scientific-Technical Information Relevant to Interpreting Article 2 of the U.N. Framework Convention on Climate Change*.

The White House. 2021. Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. January 20. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-public-health-and-environment-and-restoring-science-to-tackle-climate-crisis/>

## 3.9 Hazards and Hazardous Materials

### 3.9.1 Environmental Setting

As defined in Chapter 6.95 of Division 20 of the California Health and Safety Code, Section 25501(o), a hazardous material is “...any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.”

California Government Code Section 65962.5 requires the California Environmental Protection Agency (Cal/EPA) to compile, maintain, and update specified lists of hazardous material release sites. The CEQA Guidelines (California Public Resources Code, Section 21092.6) require the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any alternatives are identified on or near one or more hazardous materials release sites. The lists are collectively referred to as the “Cortese List” after the legislator who authored the legislation. Any future housing project proposed within City would be subject to PRC Section 21092.6 which would require both review of Cortese List databases and analysis of findings to be included in the designated CEQA documentation.

According to the Manhattan Beach General Plan, many businesses in the City, including dry cleaners and gas stations, can handle and transport hazardous materials. In addition, two “archive” sites in the City have been identified as Superfund sites under the Comprehensive Environmental Response, Compensation, and Liability Act

(CERCLA); however, according to the USEPA, these sites no longer pose an immediate or long-term risk to human health or the environment and further remedial action is planned for these sites under the Superfund Program (City of Manhattan Beach 2003).

The Manhattan Village residential area was previously an oil field that had large oil storage tanks. The area has a vapor recovery system which captures and recovers dilute volatile organic compounds and other hazardous air pollutants. Industrial uses in the adjacent City of El Segundo may affect Manhattan Beach residents, including the Chevron Oil Refinery and the El Segundo Generation Site (City of Manhattan Beach 2003).

The Manhattan Beach Fire Department Fire Prevention Division participates in a local hazardous materials program through a joint agreement with the Los Angeles County Fire Department. Division responsibilities include cleanup of spills, leaks, and illegal dumping, and monitoring hazardous materials within businesses in Manhattan Beach (City of Manhattan Beach 2003).

## 3.9.2 Regulatory Setting

### Federal

#### U.S. Environmental Protection Agency

Title 40 USC, Chapter 1, Subchapter I, Parts 260-265 – Solid Waste Disposal Act/ Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA), establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 USC, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names asbestos-containing material (ACM) as one of these materials. ACM use, removal, and disposal are regulated by USEPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 42 U.S. Code of Federal Regulations, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) provides for public access to information about chemical hazards. The EPCRA and its regulations included in Title 40 U.S.C. Parts 350-372 establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. USEPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 USC, Chapter 53, Subchapter I, Section 2601 et seq. – Toxic Substances Control Act of 1976

The Toxic Substances Control Act (TSCA) of 1976 empowers USEPA to require reporting, record-keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and also sets requirements for the use, handling, and disposal of ACM as well as for lead-based paint (LBP) waste. As discussed above, USEPA has also established NESHAP, which govern the use, removal, and disposal of ACM as a hazardous air pollutant and mandate the removal of friable ACM before a building is demolished and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

#### Regional Screening Levels (RSLs)

The federal EPA provides regional screening levels for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision-making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) incorporated the EPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment (HHRA) Note 3, which incorporates HERO recommendations and DTSC-modified screening levels (DTSC-SLs) based on review of the EPA RSLs. The DTSC-RSL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

#### U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 USC, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

## Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

## State

### California Unified Program for Management of Hazardous Waste and Materials

California Health and Safety Code (HSC), Division 20, Chapter 6.11, Sections 25404- 25404.9 Sections– Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the California Environmental Protection Agency (CalEPA), the Department of Toxic Substances Control (DTSC) and Enforcement and Emergency Response Program (EERP) administer the technical implementation of California’s Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC 2019). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California HSC made by SB 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act (APSA) Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan (HMMP) and Hazardous Material Inventory Statements (HMIS)
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the City is the LACFD working jointly with the Manhattan Beach Fire Department

## Hazardous Waste Management

Title 22 CCR, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste

In the State of California, the Department of Toxic Substances Control (DTSC) regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off-

site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31 – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every four years and, as applicable, select and implement viable source reduction alternatives. This Act does not apply to non-typical hazardous waste, including ACM and PCBs, among others.

#### Title 22 California HSC, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

#### Human Health Risk Assessment Note 3 –DTSC-Modified Screening Levels (DTSC-SLs)

HHRA Note Number 3 presents recommended screening levels (derived from the EPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-SL should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

#### Environmental Cleanup Levels

##### Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs were developed by San Francisco Bay Regional Water Quality Control Board; however, they are used throughout the state. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California currently use the ESLs (as opposed to RSLs). In general, the ESLs could be used at any site in the State of California, provided all stakeholders agree. In Dudek’s recent experience, regulatory agencies in the southern California region use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a leaking underground storage tank (LUST); those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

#### California Integrated Waste Management Board

##### Title 14 CCR, Division 7, Chapter 8.2 – Electronic Waste Recovery and Recycling Act of 2003

This regulation sets requirements regarding the use and disposal of hazardous substances in electronics. When discarded, the DTSC considers the following materials manufactured before 2006 to be hazardous waste: cathode ray tube devices, liquid crystal display (LCD) desktop monitors, laptop computers with LCD displays, LCD televisions, plasma televisions, and portable DVD Players with LCD screens.

## Occupational Safety and Health

### Title 8 CCR – Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the CCR. CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances.

In Division 1, Chapter 4, Subchapter 4 – Construction Safety Orders of Title 8, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

## Asbestos and Air Quality

### Enforcement of the NESHAP Regulation, HSC Section 39658(b)(1)

The California Air Resources Board (CARB) is responsible for overseeing compliance with the federal Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) in Los Angeles County. The Asbestos NESHAP Program enforces compliance with the federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulation for asbestos and investigates all related complaints, as specified by HSC Section 39658(b)(1). Of the 35 air districts in California, 16 of these districts do not have an asbestos program in place. In these "non-delegated" districts, a demolition/renovation notification is required for compliance with the Asbestos NESHAP. (This notification is not equivalent to a permit.) CARB reviews and investigates the notifications. The program also administers two annual statewide asbestos NESHAP task force meetings for air districts and US EPA to facilitate communication and enforcement continuity and assists US EPA in training district staff to enforce the asbestos NESHAP.

## Contractors State License Board

The California Department of Consumer Affairs Contractors State License Board manages the licensing of asbestos abatement contractors.

## Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in a construction project and to perform lead-related construction work in an effective and safe manner. The specific regulations are as follows:

### California Health & Safety Code Sections 124125 to 124165

Declared childhood lead exposure as the most significant childhood environmental health problem in the State. Established the Childhood Lead Poisoning Prevention Program and instructed it to continue to take steps necessary to reduce the incidence of childhood lead exposure in California.

### California Health & Safety Code Sections 105275 to 105310

Reaffirmed California's commitment to lead poisoning prevention activities; provided CDPH with broad mandates on blood lead screening protocols, laboratory quality assurance, identification, and management of lead exposed children, and reducing lead exposures.

### California Health & Safety Code Section 105250

Establishes a program to accredit lead-related construction training providers and certify individuals to conduct lead-related construction activities.

### California Civil Code Section 1941.1; California Health & Safety Code Sections 17961, 17980, 124130, 17920.10, 105251 to 105257

Deems a building to be in violation of the State Housing Law if it contains lead hazards and requires local enforcement agencies to enforce provisions related to lead hazards. Makes it a crime for a person to engage in specified acts related to lead hazard evaluation, abatement, and lead-related constructions courses, unless certified or accredited by the Department. Permits local enforcement agencies to order the abatement of lead hazards or issue a cease and desist order in response to lead hazards.

### California Civil Code Sections 1102 to 1102.16

Requires the disclosure of known lead-based paint hazards upon sale of a property.

### California Education Code Sections 32240 to 32245

Implemented a lead poisoning prevention and protection program for California schools for a survey to ascertain risk factors that predicted lead contamination in public schools. The survey was completed in 1998. Findings of the survey are under Materials and Products.

### California Labor Code Sections 6716 to 6717

Provides for the establishment of standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation, and repair.

### California Health & Safety Code Sections 116875 to 116880

Requires the use of lead-free pipes and fixtures in any installation or repair of a public water system or in a facility where water is provided for human consumption.

### California Health & Safety Code Sections 105185 to 105197

Establishes an occupational lead poisoning prevention program to register and monitor laboratory reports of adult lead toxicity cases, monitor reported cases of occupational lead poisoning to ascertain lead poisoning sources, conduct investigations of take-home exposure cases, train employees and health professionals regarding occupational lead poisoning prevention, and recommended means for lead poisoning prevention.



## California Building Standards Commission

### Title 24 of the CCR – California Building Standards Code

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the Code contains requirements regarding the storage and handling of hazardous materials. The Chief Building Official at the local government level (i.e., City of Manhattan Beach) must inspect and verify compliance with these requirements prior to issuance of an occupancy permit.

### California Building Code – Chapter 7A

This chapter of the California Building Code establishes minimum standards for buildings located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire.

## California State Fire Marshal

### Title 19 CCR, Division 1, Chapter 10 – Explosives

This regulation addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local Fire Chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained in Chapter 10 of Title 19.

## California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, California Highway Patrol, Regional Water Quality Control Boards, air quality management districts, and county disaster response offices.

## California Accidental Release Prevention Program

Similar to the EPA Risk Management Program, the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit a hazardous materials business

plan (HMBP) to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is further required to specify applicability of other state regulatory programs. The overall purpose of CalARP is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

## California Dig Alert

### CA Government Code 4216

In accordance with CA Government Code 4216.2, an excavator planning to conduct an excavation shall notify the appropriate regional notification center of the intent to excavate between two and fourteen calendar days prior to excavation activities. When the excavation is proposed within 10 feet of a “high priority subsurface installation”, which includes high pressure natural gas and petroleum pipelines, the operator of the high priority subsurface installation shall notify the excavator of the existing of the installation and set up an onsite meeting to determine actions required to verify location and prevent damage to the installation. The excavator shall not begin excavating until the onsite meeting is complete.

## Regional and Local

### South Coast Air Quality Management District

#### Rule 1403: Work Practice Requirements for Asbestos

SCAQMD Rule 1403 governs work practice requirements for asbestos in all renovation and demolition activities. The rule includes requirements for asbestos surveying, notifications, ACM removal procedures, schedules, handling and clean-up procedures, and storage, disposal, and landfill requirements for waste materials. All operators are also required to maintain records and use appropriate labels, signs, and markings.

### City of Manhattan Beach General Plan

The City’s General Plan includes the following goals and policies related to hazards and hazardous materials:

Goal CS-1: Minimize the risks to public health, safety, and welfare resulting from natural and human caused hazards.

Policy CS-1.8: Participate in Federal, State, and local earthquake preparedness and emergency response programs.

Goal CS-2: Protect residents from hazardous materials and the hazards associated with the transport of such materials.

Policy CS-2.1: Continue to encourage and support the enforcement of state and federal environmental and pollution control laws.

Policy CS-2.2: *Continue to support and encourage state and federal efforts to identify existing or previously existing hazardous waste generators or disposal sites and monitor disposal of all wastes and contamination of their sites.*

Policy CS-2.3: Continue to monitor underground emissions and associated hazards in Manhattan Village and in other areas adjacent to industrial uses.

Policy CS-2.4: Promote the routing of vehicles carrying potentially hazardous materials along transportation corridors that reduce public exposure to risk. Cooperate with regional agencies in developing such routing systems.

Policy CS-2.6: Develop and support an educational program to assist small users (individuals and households) to dispose of small quantities of hazardous materials.

Policy CS-2.7: Continue to monitor the potential environmental risks posed by industrial users in the City and adjacent jurisdictions, and actively work with State, Federal, and other agencies to prevent and mitigate any accidents

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.2: Cooperate with other jurisdictions in the South Bay area to maintain an up-to-date emergency response system for the region.

## Manhattan Beach Municipal Code

### **Chapter 5.76, Liability for Costs of Response to Hazardous Waste or Substance Spills, Releases, and Other Incidents**

This chapter establishes liability for reimbursement of the City's expenses incurred in connection with corrective action necessitated by violations of the hazardous waste and substance control laws.

#### **Section 10.60.120(D) Hazardous and extremely hazardous materials.**

The use, handling, storage, and transportation of hazardous and extremely hazardous materials shall comply with the provisions of the California Hazardous Materials Regulations (California Code of Regulations, Title 22, Division 4).

#### **Section 14.48.030, Parking of vehicles transporting hazardous material.**

This section of the MBMC contains regulations related to the transportation of a hazardous material or substance as identified in Title 49 of the Code of Federal Regulation (CFR). Key components of this section include the requirement that all vehicles transporting Title 49 waste or substances must be attended at all times by its driver or a qualified representative of the motor carrier that operates it. The vehicle cannot be parked on any highway, highway shoulder, street, alley, public way or public place, or within five feet of the traveled portion thereof, within a residential zone or within 1,000 feet of any school or within 300 feet of any bridge or tunnel, except for brief periods when mechanical or equipment failure or disablement or malfunction of the vehicle, or the necessities of operation require the vehicle to be parked and make it impractical to park the vehicle in any other place.

### 3.9.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

**Less Than Significant Impact.** Demolition and construction activities associated with future housing development facilitated by the HEU could require transport of hazardous materials (e.g., asbestos-containing materials, lead-based paint, and/or contaminated soils); however, this would be evaluated on a case-by-case basis.

Numerous federal, State, and local requirements exist that require strict adherence to specific guidelines regarding the use, transportation, and disposal of hazardous materials. These requirements would apply to those transporting, using, or disposing of hazardous materials, and would include: the RCRA, which provides the cradle to grave regulation of hazardous wastes; CERCLA, which regulates closed and abandoned hazardous waste sites; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; IFC, which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; Title 22, which regulates the generation, transportation, treatment, storage and disposal of hazardous waste; and Title 27, which regulates the treatment, storage and disposal of solid wastes.

Furthermore, residential development sites within the City are not expected to transport, use, store, or dispose of substantial amounts of hazardous materials, with the exception of common residential-grade hazardous materials such as household cleaners and paint. If needed, the City provides an annual hazardous waste collection program, where residents would be allowed to dispose of household hazardous waste free of charge at the Community Hazardous Waste Collection Facility in Redondo Beach (City of Manhattan Beach 2003).

Additionally, approval of the HEU, as a policy document, would not change these regulations and would not provide any goals, policies, or programs that would significantly increase the exposure of hazardous materials to the public and the environment. Therefore, the HEU does not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation is required.

- b) ***Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

**Less Than Significant Impact.** Please see Threshold 3.9(a), above. The HEU is a policy document, and therefore, adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Implementation of the HEU would also not result in the routine use, transport, or disposal of hazardous materials or generate significant quantities of hazardous materials. As such, impacts related to transport, use, and disposal of hazardous materials would be less than significant, and no mitigation is required.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**Less Than Significant Impact.** Please see Threshold 3.9(a), above. The HEU is a policy document, and therefore, adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Implementation of the HEU would also not result in the routine use, transport, or disposal of hazardous materials or generate significant quantities of hazardous materials. As such, impacts related to the emission of hazardous materials within one-quarter mile of an existing or proposed school would be less than significant, and no mitigation is required.

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

**Less Than Significant Impact.** All sites of future residential projects will be evaluated using appropriate databases including the California Department of Toxic Substances Control (DTSC) EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects will be assessed at the time the projects are actually proposed.

Additionally, the HEU is a policy document and adoption would not itself, result in negative environmental impacts. However, implementation of the programs contained in the document will accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, impacts would be less than significant, and no mitigation is required.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

**No Impact.** The City is located more than two miles away from the Los Angeles International Airport, the closest airport to the City. No private airstrip is located within or adjacent to Manhattan Beach. As such, no impacts would occur.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**No Impact.** The City's General Plan contains specific goals and polices to maintain effective and high-quality emergency response services for the community, including cooperating with other South Bay jurisdictions to maintain an up-to-date regional emergency response system; disseminating information to residents, businesses, and schools on preparing for and responding to natural disasters; and ensuring that all street signs and street numbers are visible and legible to minimize emergency response time (City of Manhattan Beach 2003). The HEU is a policy document identifying how the City would provide additional capacity for the future construction of 479 units, which would be constructed on infill sites

given the developed nature of the City. As such, with the addition of future residences, there would be an increased demand for services, but no construction would occur such that the HEU would impair implementation of, or physically interfere with, an adopted emergency response or evaluation plan. No physical impacts would occur.

**g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

**No Impact.** According to the City’s General Plan EIR, there are no wildlands in Manhattan Beach. As such, there would be no potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No impact would occur.

### 3.9.4 References

City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed October 2, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.

## 3.10 Hydrology and Water Quality

### 3.10.1 Environmental Setting

#### Surface Water

##### Santa Monica Bay Watershed Area

The majority of City land is located within the Santa Monica Bay Watershed area, which covers approximately 177 square miles of Los Angeles County. The watershed drains into the Pacific Ocean and includes the Dominguez Channel. Other municipalities that fall within the boundaries of this Watershed Area include Carson, Los Angeles, Torrance, Los Angeles County, Gardena, Redondo Beach, Inglewood, Rancho Palos Verdes, El Segundo, Lomita, Lawndale, Rolling Hills Estates, Hermosa Beach, Rolling Hills, Compton, Hawthorne, and Palos Verdes Estates (LACDPW 2021). The City is generally classified as being the South Santa Monica Bay Watershed which is highly urbanized, consisting of approximately 76% built environment and 16% open space (LACDPW 2005).

##### Dominguez Watersheds

According to the County of Los Angeles Department of Public Work, (2021b) the Dominguez Watershed is located within the southern portion of Los Angeles County and encompasses approximately 133 square miles of land and water. Approximately 81% of the watershed or 93% of the land is developed. Residential development covers nearly 40% of the watershed, and another 41% is made up by industrial, commercial and transportation uses. With a population of nearly 1 million, considerable demands are made on infrastructure and services within the watershed. Water supply is limited, and the majority of water use is from imported sources. Parkland and open space are in short supply and generally are deficient (LACDPW 2021).

## Water Quality

Existing, potential or intermittent beneficial uses for the Santa Monica Bay, where stormwaters from the City are discharged and for the underlying groundwater basins in the City (West Coast Basin) include: navigation (NAV); Water Recreation (REC-1, REC-2); commercial and sport fishing (COMM); marine habitat (MAR); wildlife habitat (WILD); spawning, Reproduction, and/or early development (SPWN); and shellfish harvesting (SHELL)(EWMP 2018). Under Clean Water Act Section 303(d), the State of California is required to develop total maximum daily loads (TMDLs), which define how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. TMDLs have been established for impaired water bodies in throughout California. Including the Santa Monica Bay Beaches, and the Santa Monica Bay (EWMP 2018). High priority pollutants with established TMDLs in the beaches and the Bay and include dry and wet weather bacteria, trash/debris, Dichloro-diphenyl-trichloroethane (DDT) and Polychlorinated Biphenyls (PCB) (EWMP 2018).

## Storm Drainage

Stormwater runoff flows directly into the City's storm drain system via street gutters and other inlets, and this flow in turn discharges into the County of Los Angeles flood control network, which ultimately drains into the Pacific Ocean (City of Manhattan Beach 2003a). The Los Angeles County Department of Public Works (LACDPW) maintains the regional storm drain system, including two major pumping plants (Polliwog Pond and Johnson Street) in the City (City of Manhattan Beach 2003a). With regard to capacity, the established system is adequate to handle most stormwater runoff. However, during unusually heavy storm events, the system can become overwhelmed.

The Federal Water Pollution Control Act prohibits the discharge of any pollutant to navigable waters from a point source unless the discharge is authorized by a National Pollutant Discharge Elimination System (NPDES) permit. Manhattan Beach participates in the NPDES permit program via a partnership consisting of the County, all cities within the County and the County Flood Control District (City of Manhattan Beach 2003a). Polliwog Park contains storm drainage facilities to help reduce pollutants entering the storm drain system, which also has the added benefit of recharging groundwater supplies. The City has also installed several storm water filtration devices called continuous deflective separation (CDS) units at strategic locations throughout the City (City of Manhattan Beach 2003a). The CDS units are designed to capture and retain sediments, floatable and settleable trash and debris before the runoff enters the ocean. Stormwater passes through the CDS system and returns to the storm drain system, while debris and coarse sediments are retained and settled into a sump where they can be collected and hauled away (City of Manhattan Beach 2003a).

## Groundwater

According to the West Basin Municipal Water District (2021), the West Coast Groundwater Basin (Basin) underlies 160 square miles in the southwestern part of the Los Angeles Coastal Plain in Los Angeles County, including the City of Manhattan Beach. The Basin extends southwesterly along the coast from the Newport-Inglewood Uplift to the Santa Monica Bay. The Basin provides groundwater to approximately 11 cities and unincorporated areas of Los Angeles County. This average annual production is roughly 52,000 Acre-feet (AF), which accounts for 20% of total retail demands (WBMWD 2021). Basin groundwater within the City is extracted by City owned and operated wells (City of Manhattan Beach 2003b). The City is allowed to pump approximately 3.8 million gallons per year (City of Manhattan Beach 2003b).



## Flooding

The Federal Emergency Management Agency (FEMA) provides flood hazard and risk data to help guide mitigation actions. Flood mapping is an important part of the National Flood Insurance Program, as it is the basis of National Flood Insurance Program regulations and flood insurance requirements. The land area east of the beach is not located within a FEMA-designated Special Flood Hazard Area and is designated as Zone X (an area of minimal flooding potential). However, the sandy beach area, where non-habitable development exists, is designated as AE, which is defined as a high-risk areas have at least a 1% annual chance of flooding (County of Los Angeles 2021a, 2021b).

### 3.10.2 Regulatory Setting

#### Federal

##### National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate FEMA to evaluate flood hazards. FEMA provides flood insurance rate maps for local and regional planners to promote sound land use and floodplain development, identifying potential flood areas based on the current conditions. To delineate a flood insurance rate map, FEMA conducts engineering studies referred to as flood insurance studies. Using information gathered in these studies, FEMA engineers and cartographers delineate Special Flood Hazard Areas on flood insurance rate maps.

##### Clean Water Act

The Clean Water Act (CWA) (33 USC 1251 et seq.), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” Key sections of the act are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives and establish TMDLs for each pollutant/stressor.
- Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. As there are no federal jurisdictional waters within the areas identified in the sites analysis as having potential to accommodate future residential development, no water quality certification under CWA Section 401 would be required.
- Section 406 establishes NPDES, a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs), which have several programs that implement individual and general permits related to construction activities, municipal stormwater discharges, and various kinds of non-stormwater discharges. State and regional water quality related permits and approvals, including NPDES permits, are discussed below.
- Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program is jointly administered by the U.S. Army Corps of Engineers and the U.S.

Environmental Protection Agency. As there are no federal jurisdictional waters within the areas identified in the sites analysis as having potential to accommodate future residential development, the HEU, or future development pursuant to the HEU, would not require a permit under CWA Section 404.

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes the USEPA and the U.S. Army Corps of Engineers. At the State level, with the exception of tribal lands, the Cal/EPA and its sub-agencies, including the SWRCB, have been delegated primary responsibility for administering and enforcing the CWA in California.

### Federal Antidegradation Policy

The Federal Antidegradation Policy (40 CFR 131.12) requires states to develop statewide antidegradation policies and identify methods for implementation. Pursuant to the Code of Federal Regulations (CFR), state antidegradation policies and implementation methods shall, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the State finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

### State

#### Porter-Cologne Water Quality Act (California Water Code)

The Porter-Cologne Act (codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter-Cologne Act applies to waters of the State, which includes isolated wetlands and groundwater in addition to federal waters. This act is implemented by the SWRCB and the nine RWQCBs. In addition to other regulatory responsibilities, the RWQCBs have the authority to conduct, order, and oversee investigation and cleanup where discharges or threatened discharges of waste to waters of the State could cause pollution or nuisance, including impacts to public health and the environment.

The act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code Section 13260 subdivision (a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system that could affect the quality of the waters of the state, to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both State and federal law. For other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the State (such as groundwater and isolated wetlands), waste discharge requirements (WDRs) are required and are issued exclusively under state law. WDRs typically require many of the same BMPs and pollution control technologies as required by NPDES-derived permits.

#### California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the

State (e.g., isolated wetlands and groundwater), not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained, and discharge to that water body shall not unreasonably affect present or anticipated beneficial use of such water resources.

### **California Toxics Rule**

The U.S. Environmental Protection Agency has established water quality criteria for certain toxic substances via the California Toxics Rule. The California Toxics Rule established acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters and enclosed bays and estuaries, that are designated by each RWQCB as having beneficial uses protective of aquatic life or human health.

### **NPDES and WDR Permits**

NPDES and WDR programs regulate construction, municipal, and industrial stormwater, and non-stormwater discharges under the requirements of the CWA and the Porter-Cologne Water Quality Control Act. The Construction Stormwater Program is administered by the SWRCB, while the Municipal Stormwater Program and other WDRs are administered by the Los Angeles RWQCB. The Manhattan Beach Public Works Department enforces NPDES requirements, which are adopted as part of the MBMC.

### **Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended)**

Pursuant to CWA Section 406(p), requiring regulations for permitting of certain storm water discharges, the SWRCB has issued a statewide General Permit for Stormwater Discharges Associated with Construction Activity and Land Disturbance Activities (Order No. 2010-0014-DWQ, adopted by the SWRCB on November 16, 2010, and effective February 14, 2011).

Under this Construction General Permit, discharges of storm water from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing and filing permit registration documents, which include a Notice of Intent and Stormwater Pollution Prevention Plan (SWPPP), prior to the commencement of construction activity. SWPPPs incorporate erosion control, sediment removal, and construction waste management control measures during construction, site stabilization measures in the short-term post-construction period, and may identify BMPs for post-construction land use.

Dischargers must file a Notice of Termination when construction is complete and final stabilization has been reached or ownership has been transferred. The discharger must certify that all state and local requirements have been met in accordance with this Construction General Permit. For construction to be found complete, the discharger must install post-construction storm water management measures and establish a long-term maintenance plan.

### **California Water Plan**

Required by the California Water Code Section 10005(a), the California Water Plan, prepared by the California Department of Water Resources, is the state government's strategic plan for managing and developing water resources statewide for current and future generations and provides a framework for water managers, legislators, and the public to consider options and make decisions regarding California's water future. The California Water

Plan, which is updated every five years, presents basic data and information on California’s water resources, including water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The California Water Plan also identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the state’s water needs.

The goal for the California Water Plan Update is to meet California Water Code requirements. This plan received broad support among those participating in California’s water planning, and is a useful document for the public, water planners throughout the State, legislators, and other decision-makers.

### **California Green Building Standards Code**

The California Green Building Standards Code (CALGreen Code), Part 11 of the California Building Standards Code (Title 24) is designed to improve public health, safety, and general welfare by using design and construction methods that reduce the negative environmental impact of development and to encourage sustainable construction practices. The CALGreen Code provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including, but not limited to, site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards designed to encourage developers and cities to aim for a higher standard of development.

### **California Building Code**

Pursuant to California Government Code Section 50022.2, the California Building Code, 2019 Edition, published at Title 24, Part 2, of the California Code of Regulations, including Appendices F, J, and O, and Standards ((including Section 1, Division 2; Chapter 31B and excluding all other Appendices), has been adopted by reference into the MBMC (Section 9.01.010), subject to the amendments, additions and deletions set forth in Chapter 9.01, Building Code.

### **Sustainable Groundwater Management Act**

The Sustainable Groundwater Management Act (SGMA) was signed into law in 2014. SGMA requires governments and water agencies of high- and medium-priority groundwater basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For critically overdrafted basins, sustainability should be achieved by 2040. For the remaining high- and medium-priority basins, 2042 is the deadline for achieving sustainability. Through SGMA, the California Department of Water Resources provides ongoing support to local agencies through guidance, financial assistance, and technical assistance. SGMA empowers local agencies to form Groundwater Sustainability Agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt Groundwater Sustainability Plans for crucial groundwater basins in California.

## **Regional and Local**

### **Water Quality Control Plan, Los Angeles Region**

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the

SWRCB and its nine RWQCBs. The SWRCB provides state-level coordination of the water quality control program by establishing statewide policies and plans for implementation of state and federal regulations. The nine RWQCBs throughout California adopt and implement Basin Plans that recognize the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, and water quality problems. The Los Angeles RWQCB is responsible for the protection of the beneficial uses of waters within the coastal watersheds of Los Angeles and Ventura counties.

The Water Quality Control Plan Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Los Angeles RWQCB Basin Plan) designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code Sections 13240–13247) (LARWQCB 2014). The Los Angeles RWQCB Basin Plan must conform to the policies set forth in the Porter-Cologne Act as established by the SWRCB in its state water policy. The Porter-Cologne Act also provides the RWQCBs with authority to include within their basin plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The Los Angeles RWQCB Basin Plan is continually being updated to include amendments related to implementation of TMDLs of potential pollutants or water quality stressors, revisions of programs and policies within the Los Angeles RWQCB Region, and changes to beneficial use designations and associated water quality objectives.

Municipal Stormwater Permit (Los Angeles RWQCB Order No. R4-2012-0175-A01, as amended), NPDES Permit No. CAS004001

The Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges Within the Coastal Watersheds of Los Angeles County, except those discharges originating from the City of Long Beach MS4 (MS4 Permit) covers 88 cities and most of the unincorporated areas of Los Angeles County. Under the MS4 Permit, the Los Angeles County Flood Control District is designated as the Principal Permittee. The Permittees are the 88 Los Angeles County cities and Los Angeles County. Collectively, these (including the City of Los Angeles) are the “Co-Permittees.” The Principal Permittee helps to facilitate activities necessary to comply with the requirements outlined in the MS4 Permit but is not responsible for ensuring compliance of any of the other Permittees.

The Los Angeles RWQCB adopted WDRs for MS4 discharges within the Coastal Watersheds of Los Angeles County on June 18, 1990 (Order No. 90-079; NPDES Permit No. CA0061654). The WDRs were later amended on December 13, 2001 (Order No. 01-182; NPDES Permit No. CAS004001, as amended). The current MS4 Permit (Order No. R4-2012-0175; NPDES Permit No. CAS004001) was adopted on November 8, 2012 and became effective on December 28, 2012.

The MS4 Permit contains effluent limitations, receiving water limitations, minimum control measures, and TMDL provisions, and outlines the process for developing watershed management programs, including the Enhanced Watershed Management Program (EWMP). The MS4 Permit incorporates the TMDL waste load allocations applicable to dry- and wet-weather as water quality-based effluent limitations and/or receiving water limitations. The MS4 Permit adopts low-impact development (LID) principles and requires development and redevelopment projects to incorporate stormwater management strategies with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible,

the use of bioretention, rain gardens, green roofs, cisterns, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used.

### Beach Cities Enhanced Water Management Program

Following adoption of the MS4 NPDES Permit, the Cities of Hermosa Beach, Manhattan Beach, Redondo Beach and Torrance, together with the Los Angeles County Flood Control District (LACFCD), collectively referred to as the Beach Cities Watershed Management Group (WMG) agreed to collaborate on the development of an Enhanced Watershed Management Program (EWMP) for the Santa Monica Bay (SMB) and Dominguez Channel Watershed areas within their jurisdictions. The EWMP is intended to facilitate effective, watershed-specific Permit implementation strategies in accordance with Permit Part VI.C. Watershed Management Program. (EWMP 2018). The EWMP identifies watershed-specific water quality priorities outlines specific strategies, control measures and best management practices (BMPs) necessary to achieve water quality targets (including Water Quality Based Effluent Limitations [WQBELs] and Receiving Water Limitations [RWLs]); and conducts quantitative analyses to support target achievement and Permit compliance.

### City of Manhattan Beach General Plan

The following General Plan goals and polices are related to hydrology and water quality:

Policy LU-2.4: Support appropriate stormwater pollution mitigation measures.

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.2: Cooperate with other jurisdictions in the South Bay area to maintain an up-to-date emergency response system for the region.

Policy CS-3.5: Review the City's emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Goal I-9: Maintain a storm drainage system that adequately protects the health and safety and property of Manhattan Beach residents.

Policy I-9.1: Evaluate the size and condition of the storm drainage system periodically to ensure its ability to handle expected storm runoff.

Policy I-9.2: Evaluate the impact of all new development and expansion of existing facilities on storm runoff and ensure that the cost of upgrading existing drainage facilities to handle the additional runoff is paid for by the development which generates it.

Policy I-9.3: Support the use of storm water runoff control measures that are effective and economically feasible.

Policy I-9.4: Encourage the use of site and landscape designs that minimize surface runoff by minimizing the use of concrete and maximizing the use of permeable surface materials.

Policy I-9.5: Support appropriate storm water pollution mitigation measures.

Policy I-9.6: Discourage new development below street level in order to avoid flooding on public and private property in areas subject to flooding.

## Manhattan Beach Municipal Code

### Chapter 5.84 -Stormwater and Urban Runoff Pollution

Chapter 5.84 requires compliance with the Federal Clean Water Act, the California Porter-Cologne Water Quality Control Act, and the Municipal National Pollutant Discharge Elimination System (NPDES) Permit by:

1. Reducing pollutants in storm water discharges to the maximum extent practicable;
2. Regulating illicit connections and illicit discharges, thereby reducing the level of contamination of storm water and urban runoff into the Municipal Separate Storm Sewer System (MS4) of the City of Manhattan Beach (City) and;
3. Regulating non-storm water discharges to the MS4.

The intent of this chapter is to ensure the future health, safety and general welfare of the citizens of the City and of the receiving waters of the County of Los Angeles and surrounding coastal areas to provide the City with the legal authority necessary to implement and enforce the requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and in the municipal NPDES permit to the extent that they are applicable in the City, to control discharges to and from those portions of the municipal storm water system (MS4) over which the City has jurisdiction as required by the municipal NPDES permit, and to hold dischargers to the MS4 accountable for their contributions of pollutants and flows.

### Section 7.44.020, Permanent water conservation measures.

Section 7.44.020 of the MBMC addresses water conservation and provides for permanent water conservation measures and drought restrictions. In addition, it established that water conservation requirements apply to 100% of projects that the City approves.

## City of Manhattan Beach Master Plans

### Wastewater System Master Plan (2010)

The objective of the Wastewater Master Plan is to evaluate the City's sewer collection system to provide a framework for undertaking the construction of new and replacement facilities for the service area in an efficient and cost-effective manner. It is designed to aid the City in meeting some of the requirements of the Statewide General Waste Discharge Requirements issued by the California Regional Water Quality Control Board in 2006.

### Water Master Plan (2010)

The purpose of the Water Master Plan (WMP) is to periodically evaluate the City's water system and provide a framework for undertaking the construction of new and replacement facilities for serving the water supply and distribution needs in an efficient manner. The WMP report presents the methodology, analyses, findings, and recommendations of a comprehensive study of the City's potable water system and describes the water system supplied by the West Basin Municipal Water District.

2015 Urban Water Management Plan (2017)

The City is a water supplier and is required to prepare an Urban Water Management Plan (UWMP) in accordance with the California Urban Water Management Planning Act (UWMP Act) which was established in 1983. The Act requires every “urban water supplier” to prepare and adopt a Plan, periodically review its Plan at least once every five years and make any amendments or changes which are indicated by the review. Pursuant to California Water Code Section 10617, an “Urban Water Supplier” is defined as a supplier, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The primary objective of the UWMP Act is to direct urban water suppliers to evaluate their existing water conservation efforts and, to the extent practicable, review and implement alternative and supplemental water conservation measures. The UWMP Act is directed primarily at retail water purveyors where programs can be immediately affected upon the consumer.

### 3.10.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

**Less Than Significant Impact.** The City has numerous safeguards in place related to water quality and safe discharge requirements. The Federal Water Pollution Control Act prohibits the discharge of any pollutant to navigable waters from a point source unless the discharge is authorized by a NPDES permit. Manhattan Beach participates in the NPDES permit program via a partnership consisting of the County and the County Flood Control District (City of Manhattan Beach 2003a). The City has established holding ponds and drainage facilities to help reduce pollutants entering the storm drain. The City has also installed CDS units in strategic locations around the City. Stormwater passes through the CDS system and returns to the storm drain system, while debris and coarse sediments are retained and settled into a sump where they can be collected and hauled away (City of Manhattan Beach 2003a). These established practices would help ensure that any future development facilitated by the HUE would not have an adverse impact on water quality.

All demolition, relocation and/or construction phases of future housing development would be subject to compliance with applicable local, regional, state and federal regulations designed to protect water resources, including those regulations requiring implementation of Best Management Practices (BMPs), preparation of SWPPPs, and submittal of Erosion Control Plans in compliance with NPDES provisions. Consistency with this regulatory framework would adequately ensure that such impacts would be avoided or reduced to less than significant.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with hydrology and water quality. As such, impacts would be less than significant, and no mitigation is required.

- b) ***Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

**Less Than Significant Impact.** Groundwater within the City is extracted by City owned and operated wells. The City is allowed to pump approximately 3.8 million gallons per year of groundwater from the West Coast Basin. As outlined in the City's General Plan EIR, all future developments are required to comply with applicable state and local regulations that concern groundwater recharge, including the MBMC (City of Manhattan Beach 2003b). Additionally, the City's Polliwog Park contains storm drainage facilities to help reduce pollutants entering the storm drain system. Following rain events, water from the surrounding area flows into the park where it is held before being pumped into the storm drain system. One of the benefits of holding the water in the park is that some of the water is absorbed into the ground, recharging the groundwater basin. Pursuant to Los Angeles County NPDES permit requirements, new construction projects are implementing similar measures to remove pollutants from runoff (City of Manhattan Beach 2003a). As such, future development envisioned within the HEU would not adversely affect groundwater.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with groundwater or groundwater recharge. Impacts would be less than significant, and no mitigation is required.

- c) ***Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

- i) ***Result in substantial erosion or siltation on- or off-site;***
- ii) ***Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;***
- iii) ***Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; and/or***
- iv) ***Impede or redirect flood flows?***

**Less Than Significant Impact.** Future residential development accommodated by the adoption of the HEU would infiltrate stormwater in accordance with all applicable regulations, as described under Threshold 3.10(a), and would continue to outflow into the existing storm drain system. No naturalized drainages or creeks would be affected. As such, impacts would be less than significant, and no mitigation is required.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with hydrology and water quality. Additionally, the parcels identified in the HEU sites analysis as having the potential to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation consist of previously developed underutilized sites in urban and semi-urban locations throughout the City.

**d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?***

**Less Than Significant Impact.** Due to its topography and location, Manhattan Beach is not subject to seiches or mud flows. As the City is coastal and located adjacent to the Pacific Ocean, in the event of a tsunami, the beach area of the City may be inundated depending on the magnitude of the event. Large tsunamis can travel at speeds exceeding 600 miles per hour, and the length, from crest to crest, may be 60 miles or more. Yet the height of a tsunami, from trough to crest, may only be a few inches or feet. The threat for tsunamis in California can be considered relatively low given the low recurrence frequencies from these phenomena. However, the threat of a seismically induced undersea landslide off the Southern California coast exists. Because locally generated tsunamis provide little time for warning, the City's General Plan includes provisions to mitigate the impacts of natural hazards, including flooding due to a tsunami, within Goal CS-3 (and Policies CS-3.2, 3.5, 3.7, and 3.9). These policies require that the City maintain a high level of City emergency response services, cooperate with other jurisdictions in the South Bay area to maintain an up-to-date emergency response system for the region, periodically review the City's emergency equipment and shelters to ensure adequacy, and continue to upgrade the quality of emergency response through education and training of personnel (City of Manhattan Beach 2003b). These goals and policies would help ensure that the City maintains a high level of City emergency response services in the event of flood hazard, tsunami, or seiche.

The HEU is a policy document and adoption will not, in and of itself, result in environmental impacts. However, implementation of the programs contained in the document will accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate the City's 6<sup>th</sup> Cycle RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, impacts related to release of pollutants due to inundation would continue to be subject to the same regulations and guidance. Therefore, impacts would be less than significant, and no mitigation is required.

**e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

**Less Than Significant Impact.** As previously discussed under Threshold 3.10(a), future projects constructed following adoption of the HEU would comply with applicable water quality regulatory requirements, including implementation of a SWPPP, and stormwater BMPs, which would minimize potential off-site surface water quality impacts and contribute to a reduction in water quality impacts. The HEU also includes Program 31, which would facilitate review of the MBMC to encourage greener building

techniques that would improve water efficiency and consider opportunities above and beyond State requirements. Program 31 would also facilitate amending the MBMC, as needed, to conform to future amendments or updates to State Green Building Standards.

The HEU is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in and of itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. Future residential development that would qualify to meet the RHNA requirement are expected to be located on infill sites in urbanized areas. The environmental effects of construction and operation this will be evaluated at the time individual projects are proposed in a manner that would ensure that applicable water quality control plans or sustainable groundwater management plans not obstructed. As such, impacts from the HEU would be less than significant, and no mitigation is required.

### 3.10.4 References

- City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.
- City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.
- EWMP (Beach Cities Enhanced Watershed Management Program). 2018. Enhanced Watershed Management Program for the Beach Cities Watershed Management Area (Santa Monica Bay and Dominguez Channel Watersheds). Accessed October 2, 2021. [https://www.waterboards.ca.gov/losangeles/water\\_issues/programs/stormwater/municipal/watershed\\_management/beach\\_cities/BeachCities\\_EWMP\\_March%20202018.pdf](https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/beach_cities/BeachCities_EWMP_March%20202018.pdf).
- LACDPW (County of Los Angeles Department of Public Works). 2021. South Santa Monica Bay Watershed Area. Accessed October 3, 2021. <https://safecleanwaterla.org/south-santa-monica-bay-watershed-area/>.
- LACDPW. 2005. Total Maximum Daily Loads Regulations in the County of Los Angeles. Accessed October 2, 2021. [http://file.lacounty.gov/SDSInter/bos/bc/035787\\_TMDLletter10.05.pdf](http://file.lacounty.gov/SDSInter/bos/bc/035787_TMDLletter10.05.pdf)
- West Basin Municipal Water District. 2021. West Coast Groundwater Basin, Accessed October 5, 2021. <https://www.westbasin.org/water-supplies/groundwater/west-coast-groundwater-basin/>.

## 3.11 Land Use and Planning

### 3.11.1 Environmental Setting

The City is located in the southwest portion of the County of Los Angeles along the Pacific Ocean, approximately 19 miles southwest of Downtown Los Angeles. The City is bordered by El Segundo and the Chevron Oil Refinery to the north, Redondo Beach and Hawthorne to the east, Hermosa Beach to the south, and the Pacific Ocean to the west.

The City is made up of five distinct neighborhoods which are grouped into "planning areas" that reflect the City's unique and varied environment (City of Manhattan Beach 2003). These planning areas are as follows:

**Beach Area:** This area contains most of the City's multi-family rental housing. Lots in this area are small with generally less than 3,000 square feet, and parking for residents and visitors is in short supply. The General Plan calls for the maintenance and enhancement of the "Village" atmosphere within the downtown commercial district. The City's goal is to promote the preservation of the small specialty retail and service activities that serve both visitors to the beach and local residents while also encouraging mixed-used residential/commercial development.

**Hill Section:** This area consists primarily of single-family residential development, with commercial and higher-density residential development limited to Sepulveda Boulevard and Manhattan Beach Boulevard. The City's General Plan promotes the maintenance of single-family neighborhoods. Higher-density, multiple-family residential development is directed to those parcels located on either side of Manhattan Beach Boulevard, which is already developed with a mix of commercial and multifamily residential uses.

**East-Side/Manhattan Village:** This includes all the City's land area located east of Sepulveda Boulevard, and a large proportion of the City's commercial and residential uses are within this area. The City's land use policy calls for the preservation of the existing character of the residential neighborhoods located in the areas. Medium-and high-density residential development is located along Manhattan Beach Boulevard, Artesia Boulevard, and in areas adjacent to Manhattan Intermediate and Meadows schools, which are designated exclusively for multiple-family residential development. Manhattan Village includes a substantial amount of regional commercial and office development as well as a significant number of condominium units.

**Tree Section:** This is the portion of the City located to the east of Grand Avenue and northwest of Valley Drive. The area will remain almost exclusively single-family residential under the policies contained in the General Plan. A small portion of the area adjacent to Sepulveda Boulevard is designated for commercial uses.

**El Porto:** This area was formerly the unincorporated community of El Porto and is located north of 38th Street between the Pacific Ocean and the City of El Segundo. The area is developed with a mix of residential and commercial uses. El Porto has the highest residential development intensities found in the City. The General Plan protects the mix of multi-family and commercial development presently existing in this area.

As shown in Figure 3.1--1, Existing Land Use, and Figure 2.3-2, Existing Zoning, the City is primarily low density, single family residential, designated in the Land Use Element as Low Density Residential and zoned as RS. Medium and high-density residential areas (RM and RH zones) extend eastward from the City's coastline and comprise much of the City's LCP planning area. Other land use types include commercial, mixed-use, industrial, parks and open space, and public facilities. In accordance with the City's Planning and Zoning Code, the HEU identified five zones where it would be appropriate to locate future RHNA allocated dwelling units: Medium-Density Residential (RM) zone, in only Area District 3; High Density Residential (RH) zone in all Area Districts; and the Local Commercial (CL), Downtown Commercial (CD), and North End Commercial (CNE) zones in all Area Districts. Figure 2.3-1, Area District Map, shows the location of the four City Area Districts.

The Planning and Zoning Code is the primary tool for implementing the General Plan, including as it applies to land use policy and applicable land use designations (City of Manhattan Beach 2030). As such, the RM, RH, CL, CD, and CNE zones must be consistent with the goals and policies outlined in their corresponding designations. Applicable designations are discussed in further detail below:

**Medium Density Residential:** The Medium Density Residential category allows single-family homes, duplexes, and triplexes, including condominiums. Multifamily housing with four or more units may be permitted subject to discretionary review and provided compatibility with surrounding development can be assured. Development densities may range from 11.6 to 32.3 units per acre. Other permitted uses include parks and recreation facilities, public and private schools, public safety facilities, and facilities for religious assembly, consistent with Planning and Zoning Code requirements, which may require discretionary review (City of Manhattan Beach 2003).

**High Density Residential:** The High Density Residential category accommodates all types of housing, and specifically housing development of a more intensive form, including apartments, condominiums, and senior housing. Residential projects may be constructed at a density of up to 51.3 units per acre. Other permitted uses include parks and recreation facilities, public and private schools, public safety facilities, and facilities for religious assembly, consistent with Planning and Zoning Code requirements, which may require discretionary review (City of Manhattan Beach 2003).

**Downtown Commercial:** The Downtown Commercial land use category applies only to the Downtown area, an area of approximately 40 blocks that radiate from the intersection of Manhattan Beach Boulevard and Manhattan Avenue. Downtown provides locations for a mix of commercial businesses, residential uses, and public uses, with a focus on pedestrian-oriented low-intensity commercial businesses that serve Manhattan Beach residents and visitors. Multifamily residential projects can be developed in accordance with the development standards for the High-Density Residential designation. The height limit in this district ranges from 26 feet to 30 feet depending on location.

**Local Commercial:** The Local Commercial land use category provides areas for neighborhood-oriented, small-scale professional offices, retail businesses, and service activities that serve the local community. Permitted uses are generally characterized by those which generate low traffic volumes, have limited parking needs, and generally do not operate late hours. Residential uses can be developed at densities consistent with the High-Density Residential designation. The height limit is 30 feet (City of Manhattan Beach 2003).

**North End Commercial:** Properties designated North End Commercial lie at the north end of the City, along Highland Avenue and Rosecrans Avenue between 33rd and 42nd Streets. Commercial uses are limited to small-scale, low intensity neighborhood-serving service businesses, retail stores, and offices. Restaurant and entertainment establishments are permitted only where zoning regulations can adequately ensure compatibility with residential uses. The maximum permitted FAR is 1.5:1. Residential uses can be developed at densities consistent with the High Density designation with a height limit of 30 feet (City of Manhattan Beach 2003).

In addition to the appropriately zoned and designated parcels identified in the sites analysis, the HEU also proposes a future rezoning program to facilitate additional housing needs required by HCD. The zoning districts included in the rezoning would be limited to the Planned Development District (PD) and the General Commercial District (CG).

The rezoning program, to be refined and implemented over an approximately three-year planning horizon, would allow for residential uses where they are not currently allowed and would increase permitted residential densities. The existing uses for the CG and PD are described below.

**General Commercial District:** The purpose of the GC district is to provide opportunities for the full range of retail and service businesses deemed suitable for location in Manhattan Beach, including businesses not permitted in other commercial districts because they attract heavy vehicular traffic or have certain adverse impacts; and to provide opportunities for offices and certain limited industrial uses that have impacts comparable to those of permitted retail and service uses to occupy space not in demand for retailing or services. The CG currently requires the issuance of a use permit for proposed mixed-use developments, which is considered a nonconforming use per the MBMC Section 10.12.020. Typically, all CG districts are within the CG land use designation (City of Manhattan Beach 2001).

**Planned Development District (PD):** An essential element of the PD is to establish a procedure for the development of parcels of land in order to reduce or eliminate the rigidity, delays, and inequities that otherwise would result from application of zoning standards and procedures designed primarily for small parcel ad hoc development. Although General Plan designations within the PD includes Parks/Open Space, the sites that could potentially undergo rezoning within the PD area are within parcels designated as Manhattan Village Commercial, a regional serving commercial district (City of Manhattan Beach 2001).

**Manhattan Village:** The Manhattan Village Commercial category applies to properties that lie within the Manhattan Village Mall area and are subject to discretionary approval requirements. Commercial uses in Manhattan Village are generally regional-serving, including shopping centers, large department and specialty stores, and entertainment and restaurant establishments. The maximum FAR is 1.5:1 (City of Manhattan Beach 2003).

Many of the areas identified in the sites analysis for potential rezoning are located within the CG zones along Sepulveda Boulevard. Sepulveda Boulevard is the only State Highway in Manhattan Beach. As a major transportation corridor for the South Bay region, Sepulveda Boulevard also functions as a commercial corridor. With the heavy traffic volumes and associated noise impacts, adequate buffering of the residential uses behind Sepulveda Boulevard from such impacts is important. The scale and character of commercial development along Sepulveda Boulevard is also an important community concern. In response to these issues, the City adopted the Sepulveda Boulevard Design Guidelines to provide a framework for future development along this corridor (City of Manhattan Beach 1999, 2003).

### 3.11.2 Regulatory Setting

#### Federal

There are no federal regulations related to land use and planning relevant to the HEU.

## State

### State Planning Law and Complete Streets Act

State planning law (California Government Code Section 65300) requires every city and county in California to adopt a comprehensive, long-term general plan for the physical development of the jurisdiction and of any land outside its boundaries that, in the planning agency's judgment, bears relation to its planning (sphere of influence). A general plan should consist of an integrated and internally consistent set of goals and policies grouped by topic into a set of elements and guided by a jurisdiction-wide vision. State law requires that a general plan address seven elements or topics (land use, circulation, housing, conservation, open space, noise, and safety), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in the state planning law should be examined to determine if there are environmental issues within the community that the general plan should address, such as hazards or flooding.

The Housing Element is one of the required elements of the General Plan. This Sixth Revision to the Housing Element complies with the California Government Code, beginning at Section 65583.

### California Coastal Act of 1976

The California Coastal Act (California Public Resource Code sections 30000 et seq.) was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100-mile coastline for the benefit of current and future generations. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the California Coastal Act (CCA) to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government. The Coastal Act requires local governments (15 coastal counties and 59 cities) to create and implement LCPs that incorporate policies to protect, enhance and restore environmentally sensitive habitats, including intertidal and nearshore waters, wetlands, bays and estuaries, riparian habitat, certain wood and grasslands, streams, lakes and habitat for rare or endangered plants or animals, as well as the scenic beauty of coastal landscapes and seascape.

## Regional/Local

### Southern California Association of Governments

The City is a member of the Southern California Association of Governments (SCAG), which is the designated Metropolitan Planning Organization for the region. SCAG is required to update its Regional Transportation Plan/Sustainable Communities Strategy every 4 years, which puts all member jurisdictions on a schedule to update their Housing Elements every 8 years. SCAG is required to develop a final Regional Housing Needs Allocation (RHNA) methodology to distribute existing and projected housing need for the 6<sup>th</sup> Cycle RHNA allocation for each jurisdiction, which will cover the planning period October 2021 through October 2029. Following extensive feedback from stakeholders during the proposed methodology comment period and an extensive policy discussion, SCAG's Regional Council voted to approve the Draft RHNA Methodology on November 7, 2019 and provide it to the State Department of Housing and Community Development for their statutory review. On January 13, 2020, the State Department of Housing and Community Development completed its review of the draft methodology and found that it furthers the five statutory objectives of RHNA, and on March 5, 2020, SCAG's Regional Council voted to approve the Final RHNA Methodology (SCAG 2020). On March 4, 2021, SCAG's Regional Council adopted the 6<sup>th</sup> Cycle Final RHNA Allocation Plan.



The HEU includes an update to the City's Housing Element and associated components to meet the RHNA requirements approved by SCAG.

### City of Manhattan Beach Local Coastal Program

The Local Coastal Program (LCP), which has been certified by the California Coastal Commission, is the basic planning tool used by Manhattan Beach to guide development in the coastal zone. The LCP contains the foundation policy for future development and protection of coastal resources, including the establishment, to the extent possible, of urban/rural boundaries and directing new housing and other development into areas with adequate services to avoid wasteful urban sprawl and leapfrog development. The LCP specifies appropriate location, type, and scale of new or changed uses of land and water and contains a designation in the Planning and Zoning Ordinance. Prepared by the City, this program governs decisions that determine the short- and long-term conservation and use of coastal resources. While the LCP reflects the unique characteristics of Manhattan Beach, the LCP must also be consistent with the CCA goals and policies. The CCA requires consistency between the LCP and General Plan. Section 30500.1 of the CCA provides that an LCP is not required to include housing policies and programs. However, Section 30007 states that local governments are not exempt from meeting requirements of State and federal law with respect to providing low- and moderate-income housing or other obligations related to housing. In those circumstances where an issue is addressed by both the LCP and General Plan, the terms of the LCP would generally prevail, including as it applies to general development aesthetics, views, and scenic vistas (City of Manhattan Beach 2003).

### Sepulveda Boulevard Development Guidelines

The City regulations for Sepulveda Boulevard development are primarily contained within Chapters 10.16 (Commercial Districts), 10.64 (Parking), and 10.52 and 10.60 (Miscellaneous) of the MBMC. The zoning districts found within the Sepulveda Corridor are CG, CC, and Single-Family Residential with the Oak Avenue Commercial Overlay (RS-D6). The guidelines are intended to encourage certain desirable elements to be included within development projects on the corridor. They are to be used as a supplement to the Planning and Zoning Code requirements during discretionary project reviews.

### City of Manhattan Beach General Plan

The Land Use Element of the General Plan provides the following goals and policies potentially relevant to the HEU (City of Manhattan Beach 2003).

Goal LU-1: Maintain the low-profile development and small-town atmosphere of Manhattan Beach.

Policy LU-1.1: Limit the height of new development to three stories where the height limit is thirty feet, or to two stories where the height limit is twenty-six feet, to protect the privacy of adjacent properties, reduce shading, protect vistas of the ocean, and preserve the low-profile image of the community.

Policy LU-1.2: Require the design of all new construction to utilize notches, balconies, rooflines, open space, setbacks, landscaping, or other architectural details to reduce the bulk of buildings and to add visual interest to the streetscape. Also referred to as the Bulk and Volume Ordinance (No. 2032).

Goal LU-2: Encourage the provision and retention of private landscaped open space.

Policy LU-2.1: Develop landscaping standards for commercial areas that unify and humanize each district.

Policy LU-2.2: Preserve and encourage private open space on residential lots citywide.

Policy LU-2.3: Protect existing mature trees throughout the City, and encourage their replacement with specimen trees whenever they are lost or removed

Policy LU-2.4: Support appropriate stormwater pollution mitigation measures.

Goal LU-3: Achieve a strong, positive community aesthetic.

Policy LU-3.1: Continue to encourage quality design in all new construction.

Policy LU-3.2: Promote the use of adopted design guidelines for new construction in Downtown, along Sepulveda Boulevard, and other areas to which guidelines apply.

Goal LU-4: Preserve the features of each community neighborhood, and develop solutions tailored to each neighborhood's unique characteristics.

Policy LU-4.1: Protect public access to and enjoyment of the beach while respecting the privacy of beach residents.

Policy LU-4.2: Develop and implement standards for the use of walkstreet encroachment areas and other public right-of-way area

Policy LU-4.3: Continue to allow use of the public landscaped area of the Strand for limited private landscaping purposes.

Policy LU-4.4: Encourage the preservation and enhancement of unique residential homes and buildings throughout Manhattan Beach to preserve the culture and history of the City.

Policy LU-4.5: Encourage measures that recognize and work to protect buildings, landscaping, and other features important to the City's history.

Policy LU-4.6: When public improvements are made, they should preserve and maintain distinctive neighborhood characteristics.

Goal LU-5: Protect residential neighborhoods from the intrusion of inappropriate and incompatible uses.

Policy LU-5.1: Require the separation or buffering of residential areas from businesses which produce noise, odors, high traffic volumes, light or glare, and parking through the use of landscaping, setbacks, or other technique.

Policy LU-5.2: Work with all commercial property owners bordering residential areas to mitigate impacts and use appropriate landscaping and buffering of residential neighborhoods.

Policy LU-5.7: Recognize the unique qualities of mixed-use areas and balance the needs of both the residential and commercial uses.

Goal LU-7: Continue to support and encourage the viability of the Downtown area of Manhattan Beach.

Policy LU-7.6: Recognize the unique qualities of mixed-use development and balance the needs of both commercial and residential uses.

### 3.11.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project physically divide an established community?***

**Less Than Significant Impact.** Existing underutilized parcels throughout the City have been identified to accommodate 377 RHNA allocated residential dwelling units in the RM, RS, CL, CD, and CNE zones. In addition, to meet a capacity deficit of approximately 406 lower-income units, as well as 73 additional “buffer” low income units, the City has identified potential sites in the CG, PD, RM, and RS districts to be made available to accommodate residential uses appropriate for lower-income households (i.e., through a rezoning program) within the mandated three-year planning horizon.

The proposed rezoning areas for additional housing would encourage infill development in areas with existing infrastructure, rather than continuing sprawling land use patterns. These changes would not introduce radically different land uses into neighborhoods, propose new street patterns, or otherwise divide these areas. In addition, sites where existing or potential capacity has been identified to accommodate future housing are dispersed throughout the previously identified seven City zoning district and would not result in a large-scale grouping of residential developments. As such, the HEU would not physically divide an established community. Impacts would be less than significant, and no mitigation is required.

**b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

**Less Than Significant Impact.** The California Government Code requires that a General Plan prepared by a local government contain an integrated, internally consistent set of goals, policies, and programs. The structure of the Housing Element, as well as the HEU, which is one of the required elements within a General Plan, is built on the same foundation upon which all other elements of the plan were formed. In addition, the HEU goals complement those found in the other elements of the General Plan. Cohesive housing policies that are appropriate to Manhattan Beach were designed through this coordination.

The RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan (SCAG 2020). SCAG is required to develop a RHNA for existing and projected housing needs for each jurisdiction, which covers the planning period of October 2021 through October 2029. The City is required to ensure the availability of residential sites at adequate densities and with appropriate development standards to accommodate its fair share of the RHNA set forth by SCAG.

The HEU is a policy document that would update the General Plan to meet state Housing Element law. As described in Threshold 3.11(a), while the HEU is a policy document that is not anticipated to produce environmental impacts, the future rezoning effort included within the HEU would allow for greater densities than currently allowed within the City to accommodate the City's 6<sup>th</sup> Cycle RHNA allocation. As a result, the HEU would be consistent and would meet the goals of the SCAG's Connect SoCal, the 2020–2045 RTP/SCS, which is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The future rezoning effort would encourage new development and redevelopment on infill parcels within urban and semi-urban areas of the PD, CG, RS, and RM zoning districts. In addition, implementation of any overlay or rezoning program would trigger additional CEQA review and the corresponding program level analysis, which would in-turn be required to assume the maximum build out made allowable by the proposed zone change(s). Therefore, impacts related to compatibility between the HEU and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant, and no mitigation is required.

### 3.11.4 References

City of Manhattan Beach. 1999. Sepulveda Boulevard Design Guidelines. Accessed October 30, 2021. <https://www.manhattanbeach.gov/Home/ShowDocument?id=83>.

City of Manhattan Beach. 2001. Manhattan Beach Municipal Code. Revised and republished 2001. Accessed September 19, 2021. [https://library.municode.com/ca/manhattan\\_beach/codes/code\\_of\\_ordinances?nodeId=MANHATTAN\\_BEACH\\_CALIFORNIAMUCO](https://library.municode.com/ca/manhattan_beach/codes/code_of_ordinances?nodeId=MANHATTAN_BEACH_CALIFORNIAMUCO).

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

SCAG (Southern California Association of Governments). 2020. The 2020–2045 Regional Transportation Plan /Sustainable Communities Strategy of the Southern California Association of Governments, Connect SoCal. <https://www.connectsocial.org/Documents/Adopted/fConnectSoCal-Plan.pdf>.

## 3.12 Mineral Resources

### 3.12.1 Environmental Setting

According to the Department of Conservation's Mineral Lands Classification map, the City is within the Mineral Resources Zone-3 within the San Fernando Valley Production-Consumption Region, which is characterized as areas containing mineral deposits of significance, which cannot be evaluated from available data (DOC 1979). Ordinarily, classification of a mineral deposit as MRZ-2a or MRZ-2b by the State Geologist will constitute adequate evidence

that an area contains significant mineral deposit; however, due to the highly built out nature of the City, current on-site land uses do not allow for oil/mineral extraction.

The City's Manhattan Village district occupies an area that was once devoted to extensive industrial uses, including a Chevron oil field (City of Manhattan Beach 2003a). However, the oil resources have been extracted, and there are no longer active wells in the City (City of Manhattan Beach 2003a, 2003b). Other than the defunct oil field, there are no known mineral resources of significant value within the City (City of Manhattan Beach 2003b).

## 3.12.2 Regulatory Setting

### Federal

There are no applicable federal policies or regulations related to mineral resources.

### State

Surface Mining and Reclamation Act: California Public Resources Code, Sections 2710 et seq.

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary regulator of onshore surface mining in the state. It delegates specific regulatory authority to local jurisdictions. The act requires the State Geologist (California Geological Survey) to identify all mineral deposits within the State and to classify them as (1) containing little or no mineral deposits; (2) containing significant deposits; or (3) deposits identified, but further evaluation is needed; (4) containing geologic information that does not rule out either the presence or absence of mineral deposits. Lands are designated MRZ-1, -2, -3, or -4, respectively. Local jurisdictions are required to enact specific procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. A particular concern of State legislators in enacting SMARA was the premature loss of minerals and protection of sites threatened by development practices that might preclude future mineral extraction.

### Mineral Resource Classification

The California Geological Survey Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by SMARA. Nonfuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. Urban preemption of prime deposits and conflicts between mining and other uses throughout California led to passage of SMARA, which requires all cities and counties to incorporate in their general plans the mapped designations approved by the State Mining and Geology Board.

The classification process involves the determination of P-C region boundaries based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C regional boundaries are modified to include only those portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. As previously noted, the classification of these mineral resources is a joint effort of the State and local governments and requires that the State Geologist classify the mineral resources area as one of the four MRZs, a Scientific Resource Zone, or an Identified Resource Area.

As part of the classification process, an analysis of site-specific conditions is utilized to calculate the total volume of aggregates within individually identified Resource Sectors. Resource Sectors are those MRZ-2 areas identified as having regional or statewide significance. Anticipated aggregate demand in the P-C region for the next 50 years is then estimated and compared to the total volume of aggregate reserves identified within the P-C region.

### California Geologic Energy Management Division

The California Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources, oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells, while working to help California achieve its climate change and clean energy goals. CalGEM publishes regular geographic information system data that includes updates to well locations and status, oil field boundaries, lease boundaries, and district boundaries. CalGEM also regulates the drilling, operation, and permanent closure of energy resource wells (CDOC 2021).

### Local

There are no applicable federal policies or regulations related to mineral resources.

## 3.12.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES</b> – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** Manhattan Village occupies an area that was once devoted to extensive industrial uses, including a Chevron oil field (City of Manhattan Beach 2003a). The oil resources have been extracted, and there are no longer active wells in the City. Other than the defunct oil field, there are no known mineral resources of significant value within the City (City of Manhattan Beach 2003b). Due to the built-out nature of the City and the lack of available mineral resources, the City has no General Plan or MBMC policies governing extraction of mineral resources. As such, no impact would occur.

**b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?***

**No Impact.** There are no locally important mineral resource recovery sites operating on or adjacent to the City (CDOC 2021). Although Manhattan Village occupies an area that was once a Chevron oil field, the oil resources have been extracted, and there are no longer active wells in the City (City of Manhattan Beach, 2003b). Other than the defunct oil field, there are no known mineral resources of significant value within the City (City of Manhattan Beach 2003b). As such, there are no locally important resources recovery sites that would be lost due to residential development facilitated by the HEU (City of Manhattan Beach 2003b), and no impact would occur.

### 3.12.4 References

CDOC (California Department of Conservation).2021. CalGEM GIS WellFinder. Accessed October 29, 2021. <https://maps.conservation.ca.gov/doggr/wellfinder/#/-118.40446/33.88608/14>.

CDOC. 1979. Generalized Aggregate Resources Classification Map, Special Report 143 Plate 2.1. [https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR\\_143-MLC-Report02.pdf](https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_143-MLC-Report02.pdf)City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29,2021.

## 3.13 Noise

### 3.13.1 Environmental Setting

The City recognizes that the ocean and coastal zone draw many residents and visitors and that the sounds associated with these areas, including crashing waves and shorebirds, are a valuable resource worth protecting. Excessive noise from traffic, business and industrial operations, construction, and concentrated activities can be disruptive and erode the quality of the City’s community. As such, the City strives to substantially reduce noise and its impacts within the urban environment, with a focus on protecting residential neighborhoods, schools, and similar noise-sensitive uses (City of Manhattan Beach 2003a).

In Manhattan Beach, vehicular traffic represents the primary noise source (City of Manhattan Beach 2003a). Major transportation-related noise sources include Sepulveda Boulevard, and arterials and collectors such as Rosecrans Avenue, Aviation Boulevard, Artesia Boulevard, Marine Avenue, Manhattan Beach Boulevard, Manhattan Avenue, Highland Avenue, and Valley/Ardmore. Vehicular traffic along collector streets that traverse residential neighborhoods, such as Valley Drive/Ardmore Avenue, Highland Avenue, and Manhattan Avenue, also impact residents living along these routes (City of Manhattan Beach 2003a). Stationary sources include industrial and commercial sources, particularly those emanating from the adjacent City of El Segundo, such as the El Segundo Generating Station and the Chevron Oil Refinery, as well as aircraft noise, construction noise and general neighborhood noise (City of Manhattan Beach 2003a).

## 3.13.2 Regulatory Setting

### Federal

#### Federal Transit Administration

In its *Transit Noise and Vibration Impact Assessment* guidance manual, the FTA recommends a daytime construction noise level threshold of 80 dBA  $L_{eq}$  over an 8-hour period (FTA 2018) when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels. In this case, the County does enumerate noise and vibration level limits; thus, FTA guidance is merely informative with respect to noise assessment for purposes of the HEU.

### State

#### Government Code Section 65302(g)

California Government Code Section 65302(g) requires the preparation of a Noise Element in a General Plan, which shall identify and appraise the noise problems in the community. The Noise Element shall recognize the guidelines adopted by the Office of Noise Control in the State Department of Health Services and shall quantify, to the extent practicable, current and projected noise levels for the following sources:

- Highways and freeways
- Primary arterials and major local streets
- Passenger and freight on-line railroad operations and ground rapid transit systems
- Aviation and airport-related operations
- Local industrial plants
- Other ground stationary noise sources contributing to the community noise environment

#### California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research (OPR), provides guidance for the acceptability of specific land use types within areas of specific noise exposure. Table 4.13-3 presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. OPR guidelines are advisory in nature. Local jurisdictions, including the City of Manhattan Beach, have the responsibility to set specific noise standards based on local conditions.



**Table 3.13-1. Land Use Compatibility for Community Noise Environments**

Land Use Type	Community Noise Exposure (CNEL)			
	Normally Acceptable <sup>1</sup>	Conditionally Acceptable <sup>2</sup>	Normally Unacceptable <sup>3</sup>	Clearly Unacceptable <sup>4</sup>
Residential-low density, single-family, duplex, mobile homes	50-60	55-70	70-75	75-85
Residential – multiple-family	50-65	60-70	70-75	70-85
Transit lodging – motel, hotels	50-65	60-70	70-80	80-85
Schools, libraries, churches, hospitals, nursing homes	50-70	60-70	70-80	80-85
Auditoriums, concert halls, amphitheatres	NA	50-70	NA	65-85
Sports arenas, outdoor spectator sports	NA	50-75	NA	70-85
Playgrounds, neighborhood parks	50-70	NA	67.5-77.5	72.5-85
Golf courses, riding stables, water recreation, cemeteries	50-70	NA	70-80	80-85
Office buildings, business commercial and professional	50-70	67.5-77.5	75-85	NA
Industrial, manufacturing, utilities, agriculture	50-75	70-80	75-85	NA

Source: OPR 2017.

Notes: CNEL = community noise equivalent level; NA = not applicable

- 1 Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
- 2 Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
- 3 Normally Unacceptable: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.
- 4 Clearly Unacceptable: New construction or development should generally not be undertaken.

### California Code of Regulations Title 24

The State of California has adopted noise standards in areas of regulation not preempted by the federal government. State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. State regulations governing noise levels generated by individual motor vehicles and occupational noise control are not applicable to planning efforts, nor are these areas typically subject to CEQA analysis. State noise regulations and policies applicable to the HEU include Title 24 requirements and noise exposure limits for various land use categories.

The 2019 California Building Code (CBC, Part 2, Title 24, Section 1204.6, California Code of Regulations) stipulates “interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (L<sub>dn</sub>) or the community noise equivalent level (CNEL)” (ICC 2019).

## Local

### City of Manhattan Beach General Plan

The Noise Element of the General Plan provides the following goals and policies potentially relevant to the HEU (City of Manhattan Beach 2003).

Goal N-1: Provide for measures to reduce noise impacts from transportation noise sources

Policy N-1.1: Use proven methods of reducing the transmission of traffic noise onto adjacent noise-sensitive land uses (e.g., residences, schools, medical facilities).

Policy N-1.2: Ensure the inclusion of noise mitigation measures in the design of new roadway projects in Manhattan Beach.

Policy N-1.3: Reduce transportation noise through proper design and coordination of vehicle routing

Policy N-1.4: Ensure the effective enforcement of City, state, and Federal noise levels by all appropriate City divisions.

Policy N-1.5: Work with appropriate agencies to mitigate impacts from existing and proposed aviation operations.

Policy N-1.6: Work with surrounding jurisdictions and other agencies to mitigate noise impacts.

Goal N-2: Incorporate noise considerations into land use planning decisions.

Policy N-2.1: Establish acceptable limits of noise for various land uses throughout the community.

Policy N-2.2: Ensure acceptable noise levels near residences, schools, medical facilities, and other noise-sensitive areas.

Policy N-2.3: Establish standards for all types of noise not already governed by local ordinances or preempted by State or Federal law.

Policy N-2.4: Encourage acoustical design in new construction.

Policy N-2.5: Require that the potential for noise be considered when approving new development to reduce the possibility of adverse effects related to noise generated by new development, as well as impacts from surrounding noise generators on the new development.

Policy N-2.6: Work with businesses in surrounding jurisdictions to manage noise impacts on City residents and businesses.

Goal N-3: Minimize the impact of non-transportation noise sources.

Policy N-3.1: Monitor and update the Noise Ordinance (Chapter 5.48, Noise Regulation) to mitigate noise conflicts.

Policy N-3.2: Enforce the Noise Ordinance.

Policy N-3.3: Minimize impacts associated with single-event noise activities.

Policy N-3.4: Recognize in the Noise Ordinance that nighttime noise levels create a greater sensitivity than do daytime noise levels.

Policy N-3.5: Encourage jurisdictions, including cities, and other agencies to require compliance with the City of Manhattan Beach Noise Ordinance where activities affect Manhattan Beach residents and businesses.

Policy N-3.6: Monitor and minimize noise impacts associated with construction activities on residential neighborhoods.

### Manhattan Beach Municipal Code

#### Chapter 5.48, Noise Regulations

The purview of Chapter 5.48 is to maintain and preserve the quiet atmosphere of the City, to implement programs aimed at retaining ambient noise levels, and to mitigate noise conflicts. This includes establishing interior and exterior noise standards, establishing appropriate hours for noise generating activities, and establishing criteria for the issuance of noise permits.

Section 9.44.030, Construction hours and prohibited days.

As part of Chapter 9.44, Construction Rules, this section dictates that construction activity shall occur only between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. to 6:00 p.m. on Saturdays. Section 9.44.030 also prohibits construction activities on Sundays and on City recognized holidays.

### 3.13.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE</b> – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**Less Than Significant Impact.** Development pursuant to the HEU has minimal potential to expose residents to noise levels in excess of regulatory standards. The General Plan recognizes that vehicular traffic represents the primary undesirable noise source in the City (City of Manhattan Beach 2003a). Any future development facilitated by the HEU adoption would be required to comply with regulations set forth by the MBMC (Chapter 5.48, Noise Regulations), the General Plan Noise Element goals and policies, and all other applicable State and federal regulatory requirements. Construction would be subject to additional requirements set forth in Chapter 9.44, Construction Rules, of the MBMC including limiting construction hours to between 7:30 a.m. and 6:00 p.m. on weekdays, and between 9:00 a.m. to 6:00 p.m. on Saturdays and prohibiting construction on certain holidays. Any future development project(s), including the future rezoning effort, would be required to undergo the appropriate level of CEQA review, which would take into consideration impacts related transportation, including any transportation noise impacts. Other provisions related to traffic noise have been incorporated into the Design Overlay District policies. The City has established eight Design Overlay Districts which establish development standards specific to the unique needs of each Overlay District. For example, in Overlay Districts D1 and D4, where traffic related noise is of particular concern, higher fences are permitted to mitigate traffic noise impacts. Policies such as this could help to mitigate any future transportation noise impacts resulting from future development.

The HEU is a policy document, outlining the framework for the City’s housing program; no actual development is proposed as part of the HEU. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City’s 6<sup>th</sup> Cycle RHNA allocation. The majority of such development is expected to be located on infill sites. Adherence to the City’s Noise Ordinance and compliance with General Plan Noise Element polices would ensure that any increases in noise levels, both temporary and permanent, would result in less than significant impacts; as such, no mitigation is required.

**b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

**Less Than Significant Impact.** Residential uses typically do not generate excessive groundborne vibration or groundborne noise levels. However, demolition and construction associated with new housing could result in impacts related to groundborne vibration or groundborne noise levels. For example, demolition and construction activities could generate vibration through the use of drills, jackhammers, pile drivers, operation of compressors and generators, cement mixing, and general truck idling. However, the City has policies that would ensure that groundborne vibrations and groundborne noise levels were minimized. Per the City’s Community Development Department, activities that have the potential to cause significant groundborne vibrations—including pile drivers/hammer/vibration installation methods, and/or pile extraction—are not permitted unless specifically pre-approved by the City’s Building Official (City of Manhattan Beach 2020). In addition, Policy N-3.6 requires that a project monitor and minimize noise impacts associated with construction activities in residential neighborhoods, while Section 10.60.120 of the MBMC dictates that no use, activity, or process can produce vibrations that are perceptible at the property lines of a site.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate future development required to meet the City’s 6th Cycle RHNA allocation. The majority of such development is expected to be located on infill sites and away from vibration sensitive low-density residential areas. Adherence to Chapters 5.48 and 9.44 of the MBMC and compliance with General Plan Noise Element polices would ensure that any noise vibration increases, both temporary and permanent, would result in less than significant impacts within the City; as such, no mitigation is required.

**c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

**No Impact.** Manhattan Beach is not located within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The Los Angeles International Airport, located approximately four miles to the north, is identified as a stationary noise source impacting residents in the City (Manhattan Beach 2003a, 2003b). However, associated noise levels are generally not considered excessive and usually do not impact daily activities in the City (City of Manhattan Beach 2003b). As such, the HEU will have no impact as it relates to airports and noise.

### 3.13.4 References

City of Manhattan Beach. 2003a. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2003b. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29,2021.

City of Manhattan Beach. 2020. Shoring Requirements Community Development Requirements. <https://www.manhattanbeach.gov/home/showpublisheddocument/220/637581428309330000>. Accessed November 22, 2021.

ICC (International Code Council). 2019. California Building Code. Accessed October 1, 2021. <https://codes.iccsafe.org/content/chapter/15426/>.

OPR (State of California Office of Planning and Research). 2017. State Planning Guidelines.

## 3.14 Population and Housing

### 3.14.1 Environmental Setting

#### Population

Manhattan Beach had a population of 35,058 residents in 2021. Manhattan Beach grew very slowly during the 2000s, having grown less than 4% from 2000 to 2010 (City of Manhattan Beach 2021). Most of the growth that has recently occurred has consisted of density increases on existing parcels through demolition and replacement of existing homes. From 2010 to 2021, the City's population remained stable, but with a slight decrease by about 0.22%. This is in contrast with the County, which grew by 3.14% between 2000 and 2010, and an additional 2.3% from 2010 to 2021 (City of Manhattan Beach 2021). As an essentially built-out city, there continues to be few opportunities for growth, except through redevelopment/infill on existing parcels.

#### Housing

According to the California Department of Finance's Population and Housing estimates, there were 15,043 housing units in Manhattan Beach in 2021, an increase of approximately 5% from 2012 (City of Manhattan Beach 2021). Of the total housing stock in 2020, the majority, or 77%, were single-family detached units, and 23% were multifamily units. Mobile homes comprised the remaining 0.1%. From 2012 to 2021, the City had an increase of 111 single-family units and a decrease of 24 multi-family units due to the replacement of existing duplexes with single-family residential structures that include at least one accessory dwelling unit.

#### Employment

Housing needs are influenced by employment characteristics. Significant employment opportunities within a city can increase demand for housing in proximity to jobs. Manhattan Beach has 17,006 workers living within its borders (City of Manhattan Beach 2021). In 2019, the largest industry to employ residents of Manhattan Beach was the Management, Business, Science, and Arts occupations industries, accounting for 69.8% of the labor force (City of Manhattan Beach 2021). Employment is an important factor affecting housing needs within a community. The jobs available in each employment sector and the wages for these jobs affect the type and size of housing residents can afford, and as such, employment and projected job growth have a significant influence on housing needs during the HEU's 6<sup>th</sup> Cycle planning period (2021-2029).

## Jobs/Housing Balance

A jobs/housing balance is a ratio that indicates the number of available jobs in the City compared to the number of available housing units. The ratio is one potential indicator of a community's ability to reduce commuter traffic and overall vehicle miles traveled (VMT) by maintaining a balance between employment and housing in close proximity (e.g., within the City limits). SCAG uses the jobs-housing balance as a general tool for analyzing where people work, where they live, and how efficiently they can travel between the two. The jobs-housing balance for the City would divide the reported 2018 jobs number (16,138) by the reported 2019 housing stock number (13,427) (City of Manhattan Beach 2021), resulting in an existing jobs-housing balance of 1.2. As a comparison, Los Angeles County as a whole has an average job-housing balance of 1.43. Per the Los Angeles County General Plan, one of the most cited studies of jobs-housing balance recommends 1.3 to 1.7 as the range for an ideal jobs-housing balance (County of Los Angeles 2014, Ewing 1996). As such, the City can be considered to have a slightly less than ideal jobs/housing ratio.

### 3.14.2 Regulatory Setting

#### Federal

There are no applicable federal policies or regulations related to housing and population.

#### State

Government Code Section 65580 et seq.

Government Code Article 10.6. Housing Elements, Section 65580, declares that the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order. Governments and private sectors should work cooperatively to expand housing opportunities and accommodate housing needs in California. Furthermore, designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the State's housing goals and the purposes of this article.

#### Regional

##### Regional Growth Management Policies: Southern California Association of Governments

SCAG is recognized by the state and federal governments as the regional planning agency for the six-county south coast region that includes Los Angeles County. In 2004, SCAG adopted a voluntary regional growth strategy known as the Compass Blueprint. SCAG's Compass Blueprint is an advisory or voluntary plan that promotes mixed-use development, better access to jobs, conservation of open space, public/private partnerships, and user-fee infrastructure financing, improving the capacity and efficiency of movement of goods, reducing vehicle miles traveled, improving air quality, improving housing availability and affordability, renovating urban cores, and creating over 500,000 high-paying jobs.

## Regional Transportation Plan/Sustainable Communities Strategy

In 2020, the Regional Council of SCAG adopted the 2020–2045 RTP/SCS to increase mobility for the region’s residents and visitors (SCAG 2020). Furthermore, the 2020–2045 RTP/SCS commits to reducing emissions from transportation sources to comply with SB 375, improving public health, and meeting the National Ambient Air Quality Standards. The SCS envisions combining transportation and land use elements in order to achieve emissions reduction targets set by the California Air Resources Board (SCAG 2020). The 2020–2045 RTP/SCS includes population, jobs, and housing forecasts up to 2045.

## Regional Housing Needs Allocation

The SCAG Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) on September 3, 2020. As part of Connect SoCal, SCAG assigns a number of housing units that the City is required to plan for in the eight-year Housing Element cycle. That number of units is called the Regional Housing Needs Allocation (RHNA), and it is broken down by income category, ensuring that all economic groups are accommodated.

The City’s existing inventory of residential sites is insufficient to accommodate the 774 units in its RHNA for 2021-2029, which includes 487 lower-income units, 155 moderate-income units, and 132 above moderate-income units (SCAG 2021). As such, as part of the HEU, the City proposes a rezoning program to accommodate its RHNA gap. While potential sites have been identified as part of the HEU’s sites analysis, the precise locations and parcels are still to be determined and will need to undergo further review. The City will refine and implement the rezoning program over a three year and 120 day planning horizon, as provided by Government Code Section 65583(c)(1)(A). The 6<sup>th</sup> Cycle RHNA allocation plans for a total housing production need of 774 units for the City.

## City of Manhattan Beach Housing Element

The Housing Element is one of seven mandatory elements of the City’s General Plan. The Housing Element provides an overview of demographics, household, housing stock, economic, and regulatory factors affecting housing development and affordability within the City. The Housing Element sets forth a series of goals and implementing policies to address a variety of housing issues, including identifying vacant and underutilized sites to accommodate the City’s 6<sup>th</sup> Cycle RHNA allocation, discussed above. The HEU is an update to the Housing Element for the 6<sup>th</sup> Cycle RHNA.



### 3.14.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

**Less Than Significant Impact.** Implementation of the programs contained in the HEU would help to accommodate development required to meet the City’s 2021–2029 6<sup>th</sup> Cycle RHNA allocation. Under the RHNA allocation, the City is required to provide the zoned capacity to accommodate the development of at least 774 units using various land use planning strategies. It has been determined that the City’s inventory of residential sites will be insufficient to accommodate future housing needs, resulting in a deficiency of 406 lower-income units. As such the HEU identifies a rezoning program in the HEU to accommodate its RHNA gap. While the HEU consists of a policy document update, which is not anticipated to produce environmental impacts, the rezoning program as part of the HEU would allow for greater densities than currently allowed within the City’s PD and CG zones and will be further evaluated when the parcels to be rezoned are fully identified.

While the HEU does not propose development at this time, the HEU would facilitate additional population growth through the provision of housing within the City. However, the HEU does not require new construction or expansion of existing roadway infrastructure (e.g., new roads) as all identified sites would be located on underutilized infill development sites. Additionally, according to the HEU, methodologies utilized to identify general areas where the rezoning program may be implemented took into account accessibility to existing infrastructure and utilities. Further, all existing sites identified in the HEU as having the potential to accommodate future residential development are in areas appropriately zoned to support such development and the accompanying increase in population, which was planned and accounted for in existing General Plan. Further, any future rezoning efforts facilitated as a result of HEU implementation would be required to undergo the appropriate level of programmatic review, as required by CEQA, which would take into consideration the direct and indirect impacts related to population and would incorporate

any necessary program specific mitigation measures to reduce or eliminate any potentially significant impacts. Therefore, the HEU is not expected to result in extension of roads or infrastructure.

The HEU would be aligned with the dwelling unit needs and increased population as projected SCAG's Connect SoCal, the 2020–2045 RTP/SCS. Additionally, approval of the HEU in and of itself, as a policy document update, would not change these forecasts and would not provide any goals, policies, or programs that would significantly increase the dwelling unit and population projections by SCAG. Therefore, the HEU would not induce unplanned substantial population growth. Impacts regarding population and housing would be less than significant, and no mitigation is required.

**b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

**Less Than Significant Impact.** As described in Threshold 3.13(a), while the HEU consists of a policy document update that is not anticipated to produce environmental impacts, the rezoning program as part of the HEU would allow for greater densities than are currently allowed within the City. However, the rezoning program would not displace a substantial number of existing people or housing; rather, it would facilitate an increase in housing supply, as discussed above, on underutilized infill sites throughout the City. Therefore, implementation of the proposed HEU would have a less-than-significant impact, and no mitigation is required.

### 3.14.4 References

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed September 17, 2020. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

City of Manhattan Beach. 2021. Housing Element Update.

LAC (County of Los Angeles). 2014. County of Los Angeles 2035 General Plan. Accessed October 3, 2021. [https://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_deir.pdf](https://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf).

Ewing, Reid. 1996. Best Development Practices: Doing the Right Thing and Making Money at the Same Time. Chicago: Planners Press.

SCAG (Southern California Association of Governments). 2021. SCAG RHNA Allocation Plan. Adopted March 2021. Revised July 2021. <https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1625161899>.

## 3.15 Public Services and Recreation

### 3.15.1 Environmental Setting

#### Fire Department

Manhattan Beach’s Fire Department provides fire protection services to the City and has daily suppression staffing typically consists of eight Firefighters/Paramedics, plus one Battalion Chief who operates out of two stations. Emergency response is handled by two engines, a Paramedic rescue ambulance, and the Battalion Chief. Fire Station 1 is located adjacent to City Hall, and Fire Station 2 is Located at 1400 Manhattan Beach Boulevard. The Department responds to emergency incidents within an average time of four minutes and thirty seconds.

#### Police

The Manhattan Beach Police Department provides safety and emergency response services and engages in community programs and educational activities. The Department is also generally able to respond to high priority calls in under two and a half minutes. The response time is within the Department’s response time goals.

#### Parks

The City Park system consist of neighborhood parks, community parks, and school grounds for which the City and Manhattan beach Unified School District maintain joint user agreements. The City owns, operates, and maintains eleven parks primarily designed and used for active recreation. Joint-use agreements for use of school grounds and play areas provide residents with additional recreational facilities, particularly athletic fields. The North Porto area, which has no local parks, has immediate access to the beach.

Although Manhattan Beach is well served by parks, overuse has been an increasing issues for residents who live adjacent to parks; however, per the General Plan, the City is actively taking measures to address these concerns.

#### Schools

The Manhattan Beach Unified School District (MBUSD) operates all public schools located in Manhattan Beach. MBUSD operates eight schools, including five elementary schools (K-5), one middle school (6-8), and one high school (9-12). Other facilities include an adult school, transition school site, and several child development centers. In addition to educational services, school facilities provide recreation opportunities for all residents of the City. Schools and parks make up approximately 28% of the City’s park and open space.

#### State Beach and the “Strand”

The State Beach and the two-mile Strand provide recreational opportunities to residents of Manhattan Beach and people living throughout the southland. These resources help define Manhattan Beach and contribute significantly to its attractive living environment. Amenities include volleyball courts, biking and walking paths, play areas, and public parking. The County of Los Angeles, Department of Beaches and Harbor manages these improvements. The pier is owned by the State of California and leased to the City of Manhattan Beach.

## 3.15.2 Regulatory Setting

### Federal

#### National Fire Protection Association

The National Fire Protection Association recommends that fire departments respond to fire calls within six minutes of receiving the request for assistance 90% of the time. These time recommendations are based on the demands created by a structural fire. It is crucial to attempt to arrive and intervene at a fire scene prior to the fire spreading beyond the room of origin. Total structural destruction typically starts within eight to 10 minutes after ignition. Response time is generally defined as 1 minute to receive and dispatch the call, one minute to prepare to respond to the fire station or field and four minutes (or less) travel time.

### State

#### California Health and Safety Code (Section 13000 et seq.)

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

#### California Code of Regulations Title 24, Part 2 and Part 9

Part 2 of Title 24 of the California Code of Regulations refers to the California Building Code, which contains complete regulations and general construction building standards of State adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2019 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This code was revised in January 2019 with a change in the base model/consensus code from the Uniform Fire Code series to the International Fire Code.

#### California Public Resources Code, Section 4201-4204

This section of the California Public Resources Code was amended in 1982 to require the California Department of Forestry to classify all State Responsibility Areas (SRAs) into fire hazard severity zones. The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be used to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

#### California Government Code 66000

According to California Government Code 66000, a qualified agency, such as a local school district, may impose fees on developers to compensate for the impact that a project will have on existing facilities or services. The State

of California legislature passed Senate Bill (SB) 50 in 1998, which inserted new language into the Government Code (Sections 65995.5-65995.7), which authorized school districts to impose fees on developers of new residential construction in excess of mitigation fees authorized by Government Code 66000. School districts must meet a list of specific criteria, including the completion and annual update of a School Facility Needs Analysis, in order to be legally able to impose the additional fees.

### California Government Code Section 65995

California Government Code Section 65995 (the Leroy F. Green School Facilities Act of 1998) set base limits and additional provisions for school districts to levy fees to help fund expanded facilities to house new pupils that may be generated by development projects. Sections 65996(a) and (b) state that such fees collected by school districts provide full and complete school facilities mitigation under the California Environmental Quality Act (CEQA). These fees may be adjusted by the district over time as conditions change.

### Government Code Section 66477

The Quimby Act (Government Code Section 66477), enacted in 1975, creates a framework that allows cities and counties to provide parks for growing communities. The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements.

### 2019 California Fire Code

The California Fire Code (24 CCR Part 9) establishes regulations to safeguard life and property against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The Fire Code includes regulations regarding fire-resistance-rate construction, fire protection systems such as alarm and sprinkler systems, fire service features such as fire apparatus access roads, means of egress fire safety during construction and demolition, and wildland-urban interface areas.

## Local

### Manhattan Beach Municipal Code

#### Section 1.20.070, Public facilities

The City may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries or other public uses subject to the provisions of Section 66479 of the Subdivision Map Act.

### Section 11.20.100 Park and recreation dedications and fees

As a condition of approval of a tentative map, the subdivider/applicant must dedicate land, pay a fee in lieu thereof, or a combination of both, at the option of the City, for park and recreational purposes at the time and according to the standards and formulas contained Chapter 11.20, Dedications, of the MBMC.

### Section 3.16.010 - Adoption of 2019 California Fire Code.

This section adopts the 2019 Edition of the California Fire Code, by reference, as the official Fire Prevention Code of the City of Manhattan Beach, including Appendices B, C, and O, and as amended by Section 3.16.020, Fire Code Amendments.

### City of Manhattan Beach General Plan

The following goals and policies within the City's General Plan pertain to public services:

Goal CR-1: Maintain a park, recreation, and open space system that provides a variety of recreational opportunities accessible to all residents and meets the needs of all residents.

Policy CR-1.1: Promote the acquisition of properties for the purpose of conversion to parks and open space areas to meet the needs of City residents.

Policy CR-1.2: Encourage the development of quality commercial recreation facilities on both privately held and City owned land under long-term lease or concession agreements.

Policy CR-1.3: Acquire properties that are subject to flooding during heavy storms for the purpose of converting them to open space and park facilities, when feasible to do so.

Policy CR-1.5: Accept and actively seek out the donation of private residential properties for the development of strategically located pocket parks and similar open space.

Goal CR-3: Maintain relationships with educational institutions, as they represent a cornerstone of the community

Policy CR-3.1: Work with the Manhattan Beach Unified School District to continue joint-use agreements of City and school district facilities for arts and recreation programs.

Policy CR-3.2: Emphasize crime prevention education in local public and private schools.

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.5: Review the City's emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.7: Support the use of the best available equipment and facilities to ensure safety that meets the changing needs of the community.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Policy CS-3.10: Strive to reduce emergency response time

Goal CS-4: Maintain a high level of police protection services.

Policy CS-4.1: Recognize the importance of calculating the daytime population in determining emergency service needs.

Policy CS-4.2: Support the development and continued updating of public education programs on safety.

Policy CS-4.3: Encourage the formation and continued education of Neighborhood Watch groups to assist the police in crime prevention and detection.

Policy CS-4.4: Work with Los Angeles County Department of Beaches to ensure adequate police protection and emergency services to visitors and residents using the City’s beaches.

Policy CS-4.5: Continue to upgrade the quality of police personnel through continued education, training, and proactive recruiting efforts.

Policy CS-4.6: Support proactive measures to enhance public safety, such as use of increased foot or bicycle police patrols.

Policy CS-4.7: Strive to reduce police response time.

### 3.15.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XV. PUBLIC SERVICES**

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

***Fire protection;***

***Police protection;***

***Parks;***

***Schools; and/or***

***Other public facilities?***

**Less Than Significant Impact.** The City has provisions to mitigate for the impacts of new residential development on public services, including fire and police protection, schools, parks, and other services and utilities. For example, Section 1.20.070 provides that the City may require that areas of real property within a subdivision be reserved for parks, recreational facilities, fire stations, libraries, or other public uses. In addition, fees are charged by the City to defray the cost of providing public services and facilities to new developments, including residential developments accommodated by the proposed HEU. The City also has a requirement to pay water and sewer fees to ensure that these services will be available to serve new developments.

Required developer impact fees for parks are accommodated per the Quimby Act, which authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements. Dedications and in lieu park fees are reinforced in Section 11.20.100 (Park and recreation dedications and fees) of the MBMC. For single-family or condo developments, \$1,817 per dwelling unit is assessed for park purposes in accordance with the MBMC and Quimby Act. School District fees are required to mitigate for the potential addition of school aged children moving into the MBUSD a result of new residential development. The fees paid to the MBUSD for residential development amount to \$3.79 per square foot (City of Manhattan Beach 2021).

The ultimate development facilitated by the adoption of the HEU would be located on infill development parcels throughout the City and would not require any extensions of service areas. The HEU, therefore, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services listed above. This HEU would not change or impact standards, policies, programs, and regulations in place that ensure adequate provision of public services. Based on the above, the HEU would have a less than significant impact related to public services, and no mitigation is required.



## 3.15.4 References

City of Manhattan Beach. 2021. Developer Impact Fees Community Development. Accessed October 2, 2021. <https://www.manhattanbeach.gov/home/showdocument?id=42983>.

## 3.16 Recreation

### 3.16.1 Environmental Setting

#### Parks

The City Park system consist of neighborhood parks, community parks, and school grounds for which the City and Manhattan Beach Unified School District maintain joint user agreements. The City owns, operates, and maintains 11 parks primarily designed and used for active recreation. Joint-use agreements for use of school grounds and play areas provide residents with additional recreational facilities, particularly athletic fields. The North El Porto area, which has no local parks, has immediate access to the beach.

Although Manhattan Beach is well served by parks, overuse has been an increasing issue for residents who live adjacent to parks; however, per the General Plan, the City is actively taking measures to address these concerns.

#### State Beach and the “Strand”

The State Beach and the two-mile Strand provide recreational opportunities to residents of Manhattan Beach and people living throughout the southland. These resources help define Manhattan Beach and contribute significantly to its attractive living environment. Amenities include volleyball courts, biking and walking paths, play areas, and public parking. The County of Los Angeles, Department of Beaches and Harbor manages these improvements. The pier is owned by the State of California and leased to the City of Manhattan Beach.

### 3.16.2 Regulatory Setting

#### Federal

There are no federal regulations related to recreation that would apply to the HEU.

#### State

##### Government Code Section 66477

The Quimby Act (Government Code Section 66477), enacted in 1975, creates a framework that allows cities and counties to provide parks for growing communities. The Quimby Act authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions. The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements.

**Local**

Manhattan Beach Municipal Code

Section 1.20.070, Public facilities

The City may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries or other public uses subject to the provisions of Section 66479 of the Subdivision Map Act.

Section 11.20.100 Park and recreation dedications and fees

As a condition of approval of a tentative map, the subdivider/applicant must dedicate land, pay a fee in lieu thereof, or a combination of both, at the option of the City, for park and recreational purposes at the time and according to the standards and formulas contained Chapter 11.20, Dedications, of the MBMC.

City of Manhattan Beach General Plan

The following goals and policies within the City’s General Plan pertain to public services:

Goal CR-1: Maintain a park, recreation, and open space system that provides a variety of recreational opportunities accessible to all residents and meets the needs of all residents.

Policy CR-1.1: Promote the acquisition of properties for the purpose of conversion to parks and open space areas to meet the needs of City residents.

Policy CR-1.2: Encourage the development of quality commercial recreation facilities on both privately held and City owned land under long-term lease or concession agreements.

Policy CR-1.3: Acquire properties that are subject to flooding during heavy storms for the purpose of converting them to open space and park facilities, when feasible to do so.

Policy CR-1.5: Accept and actively seek out the donation of private residential properties for the development of strategically located pocket parks and similar open space.

### 3.16.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

**Less Than Significant Impact.** While the HEU has the potential to accommodate a higher capacity of housing (resulting in a relative increase in permanent residents placing demands upon existing recreational facilities), the City has provisions to mitigate for the impacts of new residential development on recreational services. For example, Section 1.20.070 provides that the City may require that areas of real property within the subdivision be reserved for parks, recreational facilities, fire stations, libraries, or other public uses. In addition, fees are charged by the City to defray the cost of providing recreational facilities to new developments, including residential developments accommodated by the proposed HEU. Required developer impact fees for parks are required by the City per the Quimby Act, which authorizes jurisdictions to adopt ordinances that require parkland dedication or payment of in-lieu fees as a condition of approval of residential subdivisions (City of Manhattan beach 2021). The Quimby Act also specifies acceptable uses and expenditures of such funds, such as allowing developers to set aside land, donate conservation easements, or pay direct fees for park improvements. Dedications and in lieu park fees are reinforced in Section 11.20.100 (Park and recreation dedications and fees) of the MBMC.

The HEU is a policy document, and adoption of the HEU alone would not produce environmental impacts. The HEU consists of an updated housing program for which no actual development is proposed. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, the HEU, would not result in an increase use of existing neighborhood and regional parks or other recreational facilities such that there are substantial physical deterioration of the facility. This HEU would not change or impact standards, policies, programs, and regulations in place that ensure adequate provision of recreational services and facilities. Based on the above, the HEU would have a less than significant impact, and no mitigation is required.

**b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?***

**No Impact.** As discussed above in Threshold 3.16(a), the City has provisions to mitigate for the impacts of new residential development on recreational facilities, including Section 1.20.070, requiring that areas within a subdivision be reserved for parks, recreational facilities, or other public uses. In addition, per the Quimby Act, the City requires developers to pay impact fees to offset the impacts of an increase in new permanent residents. Dedications and in lieu park fees are reinforced in Section 11.20.100 (Park and

recreation dedications and fees) of the MBMC. For single-family or condo developments, \$1,817 per dwelling unit is assessed for park purposes in accordance with the MBMC and Quimby Act. Ultimately, the HEU involves the adoption of the HEU, which is a policy document would not, in and of itself, result in environmental impacts or result in the need for new or expanded recreational facilities. As such, no impacts to recreational facilities would occur.

### 3.16.4 References

City of Manhattan Beach. 2021. Developer Impact Fees Community Development. Accessed October 2, 2021. <https://www.manhattanbeach.gov/home/showdocument?id=42983>.

## 3.17 Transportation

### 3.17.1 Environmental Setting

CEQA Section 15064.3(a) established vehicle miles travelled (VMT) as the most appropriate measure of transportation impacts. The subdivision (a) defines VMT as “the amount and distance of automobile travel attributable to a project.” The term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. For land use projects and plans, such as the HEU, based on the predominant use, the following VMT efficiency metrics and method of estimation can be used:

- Total VMT per Service Population: The total VMT to and from all zones in the geographic area are divided by the total service population to get the efficiency metric of VMT per service population. The total service population is the sum of the number residents and the number of employees.
- Residential (Home-based) VMT per capita: All home-based auto vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the population within the geographic area to get the efficiency metric of home-based VMT per capita (or per resident).
- Employment (Home-based work) VMT per employee: All auto vehicle trips between home and work are counted, and then divided by the number of employees within the geographic area to get the efficiency metric of home-based work VMT per employee.

According to the County of Los Angeles modelled VMT by City (2016) the City of Manhattan Beach has an average per capita VMT of 24.27 (per person per year) (County of Los Angeles 2021).

The City is within the County’s South Bay Planning Area for regional transportation. This area is served by portions of Interstate 405 (I-405), Interstate 110 (I-110), Interstate 105 (I-105), State Route 91 (SR 91), and State Route 47 (SR 47). The main north-south highways include Vermont Avenue, Hawthorne Boulevard (SR-107), and La Cienega Boulevard. East-west highways and secondary highways include Torrance Boulevard, Manhattan Beach Boulevard, and Sepulveda Boulevard. As previously discussed, Sepulveda Boulevard is the only State Highway in Manhattan Beach. As a major transportation corridor for the South Bay region, Sepulveda Boulevard also functions as a commercial corridor for the City and supports heavy traffic volumes.

## 3.17.2 Regulatory Setting

### Federal

There are no applicable federal regulations related to transportation that would apply to the HEU.

### State

#### Senate Bill 743

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline review under the CEQA process for several categories of development projects, including the development of infill projects in transit priority areas, and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit Oriented Infill Projects, to the CEQA Statute (California Public Resources Code, Section 21099). Section 21099(d)(1) provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. In addition, SB 743 mandates that alternative metric(s) for determining impacts relative to transportation shall be developed to replace the use of level of service (LOS) in CEQA documents.

In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity such as widening a roadway or the size of an intersection, which in turn induces more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative modes of transportation such as biking, walking, and transit. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop an alternative metric(s) for analyzing transportation impacts in CEQA documents. The alternative shall promote the state's goals of reducing GHG emissions and traffic-related air pollution by promoting the development of a multimodal transportation system and providing clean, efficient access to destinations. Under SB 743, it was anticipated that the focus of transportation analysis would shift from vehicle delay (and LOS) to VMT within transit-priority areas (i.e., areas well served by transit).

Pursuant to SB 743, OPR released the draft revised CEQA Guidelines in November 2017, recommending the use of VMT for analyzing transportation impacts. Additionally, OPR released updates to the Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdictions. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance...recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence" (CEQA Guidelines Section 15064.7[c]).

#### Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act; SB 375) supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, the California Air

Resources Board sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, the California Air Resources Board established targets for 2020 and 2035 for each region covered by one of the state's Metropolitan Planning Organizations (MPOs). The California Air Resources Board will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its Regional Transportation Plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. California Air Resources Board must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy to meet the targets. The alternative planning strategy is not a part of the RTP.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the alternative planning strategy. Developers can get relief from certain CEQA requirements if their new residential and mixed-use projects are consistent with a region's SCS (or alternative planning strategy) that meets the targets (see California Public Resources Code, Sections 21155, 21155.1, 21155.2, 21159.28).

### Statewide Transportation Improvement Program

The California 2010 Statewide Transportation Improvement Program, approved by the U.S. Department of Transportation in October 2009, is a multi-year, Statewide, intermodal program of transportation projects that is consistent with the statewide transportation plan and planning processes, metropolitan plans, and Title 23 of the Code of Federal Regulations. The Statewide Transportation Improvement Program is prepared by Caltrans in cooperation with the MPOs and the regional transportation planning agencies. The Statewide Transportation Improvement Program contains all capital and noncapital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and Title 23 of the Code of Federal Regulations, including federally funded projects.

### The California Department of Transportation

As the owner and operator of the state highway system, Caltrans implements established state planning priorities in all functional plans, programs, and activities. Caltrans coordinates and consults with local jurisdictions when proposed local land use planning and development may impact State highway facilities. Pursuant to Section 21092.4 of the California Public Resources Code, for projects of Statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities that could be affected by the HEU.

Caltrans Draft Transportation Impact Study Guide and Safety Review (Caltrans 2020) replaced the Guide for the Preparation of Traffic Impact Studies (Caltrans 2002). Per the 2020 Transportation Impact Study Guide, Caltrans' primary review focus is VMT, replacing LOS as the metric used in CEQA transportation analyses (Caltrans 2020). Caltrans recommends use of OPR's recommended thresholds and guidance on methods of VMT assessment found in OPR's Technical Advisory (OPR 2018) for land use projects. In addition to VMT, the 2020 Transportation Impact Study Guide states that it may request a targeted operational and safety analysis to address a specific geometric or operational issue related to the state highway system and connections with the state highway system.

## Local/Regional

### Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

SCAG develops the RTP, which presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura counties. SB 375 was enacted to reduce GHG emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, SCAG is tasked with developing an SCS, an element of the RTP that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board. The SCS outlines the plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

The 2016 RTP/SCS identifies priorities for transportation planning within the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area (SCAG 2016). The Regional Transportation Improvement Programs, also prepared by SCAG based on the RTP, lists all of the regional funded/programmed improvements within the next 5 to 7 years. To qualify for CEQA streamlining benefits under SB 375, a project must be consistent with the RTP/SCS.

The 2020–2045 RTP/SCS, also known as Connect SoCal, is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020). The SCAG Regional Council adopted Connect SoCal on September 3, 2020.

For SCAG member jurisdictions, the 6<sup>th</sup> Cycle Housing Element planning period extends from 2021 to 2029. As part of Connect SoCal, SCAG assigns a number of housing units that the County is required to plan for in the eight -year Housing Element cycle. That number of units is called the Regional Housing Needs Assessment (RHNA), and it is broken down by income category, ensuring that all economic groups are accommodated. If a jurisdiction cannot show that there are enough sites to address the housing need, the jurisdiction is required to develop a rezoning program. The rezoning ensures that there are enough sites with sufficient densities to address the housing need identified through the RHNA.

### Los Angeles County Metropolitan Transportation Authority

Metro is the county-level transportation planning and public transportation operating agency that was created by the State of California to set policy, coordinate, plan, fund, build, and operate transit services and transportation programs throughout Los Angeles County. Metro supports the transportation improvement programs of the 88 cities and 16 municipal transit operators within the County, as well as Los Angeles's paratransit provider, Access Services, and its regional commuter rail service provider, Metrolink. Metro is also responsible for the preparation of the Long-

Range Transportation Plan and the Short-Range Transportation Plan (SRTP). The current Long- and Short-Range Transportation Plans are the 2020 Long-Range Transportation Plan and the 2014 Short-Range Transportation Plan. The transportation plans include all major transit and highway projects (partially or fully funded), existing programs and policies, and new policies and initiatives required to achieve Metro’s regional goals.

### Congestion Management Plan

The Congestion Management Plan (CMP) is a program adopted by the State Legislature and approved by the State voters in 1990 through Proposition 111. The CMP was created for the following purposes:

- To link land use, transportation, and air quality decisions;
- To develop a partnership among transportation decisionmakers on devising appropriate transportation solutions that include all modes of travel; and
- To propose transportation projects which are eligible to compete for state gas tax funds.

The Los Angeles County Metropolitan Transportation Authority (MTA) is responsible for preparing the County’s CMP. The MTA is required by State law to monitor local implementation of all CMP elements. Local jurisdictions are required to monitor arterial congestion levels, monitor transit services along certain corridors, and implement an adopted trip reduction Refer to the Circulation section of the Infrastructure Element ordinance and land use analysis program. In addition, a key CMP component is the deficiency plan through which jurisdictions track and report their local development activity as “debits” and transportation improvements as “credits.” Jurisdictions must maintain an annual positive balance of credits over debits to be in conformance with the CMP.

### Los Angeles County Measures R and M

Measures R and M are half cent sales tax measures for Los Angeles County to finance new transportation projects and programs and accelerates many of those already in the pipeline – everything from new rail and/or bus rapid transit projects, commuter rail improvements, The Los Angeles County Metropolitan Transit Authority rail system improvements, highway projects, improved countywide and local bus operations, and local city sponsored transportation improvements. Measure R and Measure M were approved by the minimum two-thirds vote in the November 2008 election and November 2016 election, respectively. The highway, bus and rail projects identified in the Measures respective expenditure plans are spread throughout Los Angeles County. In addition, each of the individual cities and unincorporated areas within Los Angeles County will receive a share of the revenue to use at their discretion for local transportation needs. There are three Metro funded transit projects in the South Bay region; the Crenshaw/LAX Transit Corridor Project, the Airport Metro Connector 96th Street Transit Station, and the South Bay Green Line Extension. The South Bay Cities Council of Governments (SBCCOG) administers a sub fund to improve local and regional highways including those that serve Manhattan Beach.

### City of Manhattan Beach General Plan

The General Plan “Mobility Plan” for the City of Manhattan Beach seeks provide for a balanced, multi-modal transportation system for the movement of people and goods within, to and from the City. In keeping with State and Federal laws and regulations, the Mobility Plan states that a balanced system is required, and that it must meet the needs of all users including motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods and users of public transportation. The Mobility Plan places an emphasis on non-motorized modes of transportation (bicycling and walking) as well as implementing streets that serve the mobility of all users



by providing high quality pedestrian, bicycling, and transit access to all destinations throughout the City, as appropriate, and design streets to be inviting places for all users, with beauty and amenities.

Pursuant to the SCAG's RTS/SCS, "mobility" refers to the movement of people, goods, and resources within or beyond a city or region.

The following goals and policies from the Mobility plan would apply to the HEU.

Goal I-1: Provide a balanced, safe, and efficient multi-modal transportation system that serves the mobility needs of all community members, including children, seniors, and the disabled.

Policy I-1.1: Review the safety and functioning of the street system on a regular basis to identify problems and develop solutions.

Policy I-1.2: Improve street signage citywide, to enhance safety, visibility, and ensure street signs are not obstructed.

Policy I-1.3: Encourage the development of Transportation Demand Management (TDM) plans for all major developments or facility expansions to encourage ride-sharing and other improvements, thereby reducing vehicle trips.

Policy I-1.4: Work with neighboring communities, other South Bay cities, the state and other agencies to develop regional solutions to transportation problems that are regional in nature, and to mitigate impacts of development in neighboring communities that impact the City.

Policy I-1.5: Support Dial-A-Ride or other para-transit systems for the senior and disabled members of the community.

Policy I-1.6: Require property owners, at the time of new construction or substantial remodeling to dedicate land for public improvements such as roadways, wider sidewalks and/or bicycle lanes, as appropriate and warranted by the project.

Policy I-1.7: Improve multi-modal connections to transit facilities, especially to the Metro Green Line stations.

Policy I-1.8: Improve multi-modal connections between the portions of the City east and west of Sepulveda Boulevard.

Policy I-1.9: Consider implementing a development impact fee program to collect funds from developers constructing new projects. Such fees would fund "fair-share" costs of mobility improvement projects required to mitigate project impacts.

Policy I-1.10: Promote car-sharing and neighborhood electric vehicles as important means to reduce traffic congestion and further promote climate action projects.

Policy I-1.11: Allow for flexible use of public rights-of-way to accommodate all users, while maintaining safety standards.

Policy I-1.12: Integrate the financing, design and construction of pedestrian facilities and improvements with street projects where feasible at the same time as improvements for vehicular circulation.

Goal I-2: Move commuter traffic through the City primarily on arterial streets and collector streets, as appropriate, to protect other streets from the intrusion of cut-through traffic.

Policy I-2.1: Utilize the Neighborhood Traffic Management Program (NTMP) tools to mitigate neighborhood intrusion by cut-through traffic and improve conditions for pedestrians and bicyclists.

Policy I-2.2: Monitor all major intersections and arterial streets and pursue capital projects as needed to minimize traffic diversion into local streets, improve pedestrian and bicycle conditions to keep traffic moving efficiently.

Policy I-2.3: Minimize vehicular access for new developments on local residential streets, and in locations with high pedestrian and bicycle activity, and design access and egress to avoid traffic intrusion on local streets to the maximum extent possible.

Policy I-2.4: Require property owners, at the time new construction is proposed, to either improve abutting public right-of-way to its full required width per the street master plan or to pay in-lieu fees for improvements, as appropriate.

Policy I-2.5: Encourage the use of Intelligent Transportation Systems (ITS), such as advanced traffic signalization, motorist information, advanced transit, advanced emergency vehicle access, and intelligent parking systems, as well as other appropriate communication technologies, to efficiently and safely move traffic.

Policy I-2.6: Review on-street parking in neighborhoods adjacent to commercial areas where neighbors request such review and develop parking and traffic solutions for those neighborhoods adversely impacted by spillover parking and traffic.

Policy I-2.7: Monitor and minimize traffic, parking and truck loading issues associated with construction activities.

Policy I-2.8: Carefully review commercial development proposals with regard to parking, loading and planned ingress/egress, and enforce restrictions as approved. Policy I-2.9: Comprehensively review downtown merchant and other parking permits including valet parking to ensure effective utilization of existing parking capacity.

Policy I-2.10: Protect and enhance on-street public parking including identifying appropriate motorcycle, small car, electric vehicle and bike corral parking opportunities.

Policy I-2.11: Develop a new multi-modal level of service methodology that includes:

- Emphasis on pedestrian and bicycle access and circulation
- Support for reduced vehicle miles traveled
- Maintenance of appropriate emergency vehicle access and response time

Goal I-3: Ensure adequate parking and loading facilities are available to support both residential and commercial needs while reducing adverse parking and traffic impacts.

Policy I-3.1: Periodically review existing Downtown and North Manhattan Beach parking and loading needs and implement solutions as needed to address deficiencies.

Policy I-3.2: Periodically evaluate the adequacy of parking codes in light of land use and parking demand to ensure rightsized parking facilities are provided.

Policy I-3.3: Review development proposals to ensure potential adverse parking impacts are minimized or avoided, and pedestrian and bicycle circulation are not negatively impacted.

Policy I-3.4: Encourage joint-use and off-site parking where appropriate and develop procedures and templates for use in shared parking arrangements.

Policy I-3.5: Require private development to provide public on street parking in the public right-of-way according to Public Works standards in compliance with the street master plan.

Policy I-3.6: Consider emergency vehicle access needs when developing on-street parking and other public right-of-way development standards.

Policy I-3.7: Work to preserve on-street parking within beach areas.

Policy I-3.8: Encourage the school district and private schools to promote active modes of transportation for students and employees as a means of reducing peak-hour traffic.

Policy I-3.9: Work with the school district and private schools to improve pedestrian and bicycle routing and safety around schools. Focus pedestrian access to the elementary schools and bicycle and pedestrian access to the middle and high schools.

Policy I-3.10: Discourage parking associated with schools, particularly at Mira Costa High School, within surrounding neighborhoods.

Policy I-3.11: Work with the school district and private schools to address high traffic volumes during the morning and afternoon peak school hours and improve drop-off and pick-up circulation.

Policy I-3.12: Continue to support and enhance Safe Routes to School programs such as Walking School Bus, walk audits, classroom safety instruction and promotional events

### 3.17.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION – Would the project:</b>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

**Less Than Significant Impact.** Future development associated with implementation of the HEU would be expected to generate more multi-modal trips than conventional development. In addition, the HEU is required to be in compliance with the Mobility Plan of the General Plan, which has goals and policies such as providing a balanced, safe, and efficient multi-modal transportation system; routing commuter traffic primarily on arterial and collector streets, as appropriate, to protect other streets from the intrusion of cut-through traffic; and ensuring that adequate parking and loading facilities are available to support both residential and commercial needs while reducing adverse parking and traffic impacts.

The HEU identifies that the City has the existing capacity to accommodate 377 new residential dwelling units. Through a future rezoning program, capacity for an additional 479 units would be identified. The rezoning effort will include the evaluation of potential traffic impacts related to increased transportation system demands associated with specific future residential projects, and mitigation measures would be adopted as necessary, in conformance with CEQA to address these larger scale Citywide impacts. The HEU in and of itself would not conflict with adopted policies, plans, or programs supporting alternative transportation.

Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. As such, the HEU would result in a less than significant impact on transportation, and no mitigation is required.

**b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

**Less Than Significant Impact.** and of Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. Potential traffic impacts related to increased transportation system demands associated with specific future residential projects would be assessed at the programmatic level at such a time that the rezoning program is being considered, consistent with local and state guidelines. Mitigation measures would be adopted as necessary, in conformance with CEQA. Future development projects implemented following the adoption of the rezoning program would more than likely qualify for streamlining and/or an exemption under CEQA, consistent with State and local laws encouraging the development of housing, especially affordable housing, on infill sites. Based on the above, the HEU would result in a less than significant impact related to CEQA Guidelines Section 15064.3, and no mitigation is required.

**c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

**Less Than Significant Impact.** Potential traffic impacts related to increased transportation system demands associated with specific future residential projects, including the planned rezoning program, would be assessed at the time the projects are actually proposed and would be consistent with local and state guidelines. Mitigation measures would be adopted as necessary, in conformance with CEQA. The HEU as a policy document would not increase hazards due to design features or incompatible uses.

Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. As such, the HEU would result in a less than significant impact on transportation, and no mitigation is required.

**d) *Would the project result in inadequate emergency access?***

**Less Than Significant Impact.** The City's General Plan contains specific goals and polices to maintain effective and high-quality emergency response services for the community, including cooperating with other South Bay jurisdictions to maintain an up-to-date regional emergency response system; disseminating information to residents, businesses, and schools on preparing for and responding to natural disasters; and ensuring that all street signs and street numbers are visible and legible to minimize emergency response time.

Although the HEU would provide for an eventual rezoning program, allowing for higher density residential development than is currently allowed for in the City, the development anticipated by the HEU would occur primarily on urban and semi-urban infill sites and consist primarily of multifamily and mixed-use development, and would likely not require a significant overhauls of existing transportation infrastructure. However, this is not one of the discretionary actions being undertaken at this time. As such, the HEU would result in a less than significant impact on transportation, and no mitigation is required.

## 3.17.4 References

Caltrans. 2020. Transportation Impact Study Guide, Vehicle Miles Traveled-Focused. Accessed November 1, 2021. <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

County of Los Angeles. 2021. A County VMT (Total and Per Capita) by City (2016). Accessed October 5, 2021. <https://data.lacounty.gov/Transportation/LA-County-VMT-Total-and-Per-Capita-by-City-2016-/tb57-43ih>.

SCAG. 2020. Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy. Accessed March 24, 2021. <https://scag.ca.gov/connect-socal>.

## 3.18 Tribal Cultural Resources

### 3.18.1 Environmental Setting

#### Prehistoric Setting

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions.

#### Ethnographic Setting

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Bean and Shipek 1978; Geiger and Meighan 1976; Harrington 1935; Sparkman 1908; Boscana 1846). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach by recording languages and oral histories within the region (Kroeber 1925). Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities.

It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of

pre-contact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California. This is a particularly important consideration for studies focused on tribal cultural resources (TCRs), where concepts of “cultural resource” and the importance of traditional cultural places are intended to be interpreted based on the values expressed by present-day Native American representatives and may vary from archaeological values.

## 3.18.2 Regulatory Setting

### Federal

#### National Historic Preservation Act

The National Register of Historic Places (NRHP) is the United States’ official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by the National Park Service.

The National Park Service’s guidance for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation’s history and heritage. The criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in the National Park Service’s National Register Bulletin, How to Apply the National Register Criteria” as “the ability of a property to convey its significance.” To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity” (NPS 1990). NRHP guidance further asserts that properties be completed at least 50 years ago to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be “exceptionally important” (consideration criteria G) to be considered for listing.

A historic property is defined as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria” (Title 36 Code of Federal Regulations Sections 800.16[i][1]).

## State

### California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that Tribal Cultural Resources (TCRs) must be considered under CEQA and also provided for additional requirements for the lead agency to consult with Native Americans. Public Resources Code Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- Included or determined to be eligible for inclusion on the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence (including the significance of the resource to a California Native American tribe), to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the w land areas under City jurisdiction, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

## Senate Bill 18

The Local and Tribal Intergovernmental Consultation process, commonly known as Senate Bill (SB) 18 was signed into law September of 2004 and took effect March 1, 2005. SB 18 refers to PRC Section 5097.9 and 5097.995, which defines cultural places as:

- Native American sanctified cemetery place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9).
- Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.993).



SB 18 established responsibilities for local governments to contact, provide notice to, refer plans to, and consult with California Native American tribes that have been identified by the NAHC and if that tribe requests consultation after local government outreach as stipulated in Government Code Section 65352.3. The purpose of this consultation process is to protect the identity of the cultural place and to develop appropriate and dignified treatment of the cultural place in any subsequent project. The consultation is required whenever a general plan, specific plan, or open space designation is proposed for adoption or to be amended. Once local governments have sent notification, tribes are responsible for requesting consultation. Pursuant to Government Code Section 65352.3(a)(2), each tribe has 90 days from the date on which they receive notification to respond and request consultation.

In addition to the requirements stipulated previously, SB 18 amended Government Code Section 65560 to “allow the protection of cultural places in open space element of the general plan” and amended Civil Code Section 815.3 to add “California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.”

### California Environmental Quality Act

As described further below, the following CEQA Statute and Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines “unique archaeological resource.”
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) define “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource”; it also defines the circumstances when a project would materially impair the significance of an historical resource.
- PRC Section 21074(a) defines “tribal cultural resources.”
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological sites.

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC Section 21084.1; 14 CCR 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]), it is a historical resource and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of an historical resource is materially impaired when a project (14 CCR 15064.5[b][2]):

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, including tribal cultural resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a]-[c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC within 24 hours (Section 7050.5(c)). NAHC will notify the “most likely descendant.” With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

### 3.18.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES</b>				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

- a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); and/or*
- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

**Less Than Significant Impact.** It is not expected that TCRs would be disturbed as a result of implementation of the HEU, which in and of itself, does not require any construction activities and is merely the adoption of a policy document. Furthermore, Manhattan Beach is virtually built out, and the potential for uncovering TCRs during any construction activity is considered remote (City of Manhattan Beach 2003).

Since the HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the HEU. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The HEU would not change or alter state or federal policies to protect tribal cultural resources. Potential environmental impacts to TCRs are location-specific and cannot be assessed in a meaningful way until the location of a project site is known. At such time as a development proposal is considered, that project would be subject to adopted development guidelines/standards, tribal consultation if required by tribes, and any impacts identified with the development project would be addressed through mitigation measures specific to the impact. As such, the HEU would result in less than significant impacts to tribal cultural resources, and no mitigation is required.

Pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City contacted three Native American individuals and/or tribal organizations on August 4, 2021:

- Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians, Kizh Nation
- Kenneth Kahn, Tribal Chairman, Santa Ynez Band of Chumash Indians
- Joseph Ontiveros, Cultural Resources Director, Sobaba Band of Luiseño Indians

The Santa Ynez Band of Chumash Indians, responded on August 9, 2020, and again on August 23, 2021, stating that the Elders' Council requested no further consultation on the HEU but requested to be notified of any changes in scope, or if supplementary literature reveals additional information. No further communication was received by the Santa Ynez Band of Chumash Indians, or any other Native American individuals and/or tribal organizations contacted on August 4, 2021.

## 3.18.4 References

- Bean, Lowell J., and Florence C. Shipek. 1978. "Luiseño." In *Handbook of North American Indians: Volume 8, California*, edited by Robert F. Heizer, 550-563. Washington DC: Smithsonian Institution Press.
- Boscana, Gerónimo. 1846. *Chinigchinich: a historical account of the origin, customs, and traditions of the Indians and the missionary establishment of St. Juan Capistrano, Alta California*. London: Dodo Press.
- City of Manhattan Beach. 2003. Final Environmental Impact Report, Manhattan Beach General Plan. Accessed October 29, 2021.
- Geiger, Maynard, and Clement W. Meighan. 1976. *As the padres saw them: California Indian life and customs as reported by the Franciscan Missionaries 1813-1815*. Santa Barbara: Santa Barbara Mission Archive Library.
- Harrington, John P. 1935. Fieldwork among the Indians of California. In: *Explorations and Fieldwork of the Smithsonian Institution in 1934*, pp. 81-84. Washington, DC. 1985 John P. Harrington Papers.
- Heizer, Robert F., and Karen M. Nissen 1973. *The human sources of California ethnography*. Berkeley: University of California Archaeological Research Facility.
- Heizer, Robert F. 1978. "Introduction." In *Handbook of North American Indians*, edited by Robert F. Heizer, 1-6. Washington: Smithsonian Institution.
- Kroeber, Alfred J. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology Bulletin 78. Dover Publications, Inc., New York.

## 3.19 Utilities and Service Systems

### 3.19.1 Environmental Setting

The City's current service area, as determined by the City's Urban Water Management Plan (UWMP) (2017), covers approximately 3.9 square miles, and encompasses the majority of the City of Manhattan Beach. The City maintains the local water distribution, sewage collection, and storm drain systems. Water is purchased from wholesale providers, and the City is responsible for storage and distribution. Sewage collected in laterals and City trunk lines flows into regional lines maintained by the Sanitation Districts of Los Angeles County (City of Manhattan Beach 2003). With regard to flood control, City storm drains direct runoff into major County-owned channels and other facilities maintained by the Los Angeles County Department of Public Works (LACDPW) (City of Manhattan Beach 2003).

Manhattan Beach obtains water from three sources: (1) Metropolitan Water District (MWD) treated surface water from Northern California and the Colorado River Basin, which is provided to the City by the West Basin Municipal Water District (WBMWD) and represents over 80% of the local water supply; (2) groundwater extracted by City-owned and operated wells; and (3) reclaimed water supplied for landscape irrigation from the West Basin Municipal Water District. Manhattan Beach owns the right to pump 3.8 million gallons per year of groundwater from the West Coast Basin. Imported water flows to Manhattan Beach via 45-inch MWD line in Manhattan Beach Boulevard. (City of Manhattan Beach 2003). Over the past ten years, the City's total water demands (including potable and recycled water) have ranged from 4,887 acre feet per year (AFY) to 5,896 AFY, with an average of 5,312 AFY.

The City's water system consists of pump stations, storage reservoirs, an elevated storage tank, water supply wells, a settling basin, and approximately 112 miles of distribution pipelines (City of Manhattan Beach 2003). Given that the built-out nature of the City accommodates a very modest level of growth, these facilities will likely not require any substantial expansion to meet long term needs (City of Manhattan Beach 2003). The City's efforts focus on maintenance and replacement as needed. Pursuant to the Water Master Plan, the City replaced the deteriorating roof of the Peck Reservoir in 2000, extending the reservoir's life by approximately 25 years (City of Manhattan Beach 2003). Wastewater treatment in the City is managed by the Los Angeles County Sanitation Districts and treated at the Joint Water Pollution Control Plant. In 2015, the total volume of wastewater collected from the City's service area was 3,340-acre feet (City of Manhattan Beach 2017).

Like most counties throughout the state, Los Angeles County is currently experiencing extreme drought conditions (NOAA/NIDIS 2021). In response to continued drought conditions, MWD's Board of Directors declared a Water Supply Alert in August 2021, calling for consumers and businesses to voluntarily reduce their water use and help preserve the region's storage reserves (City of Manhattan Beach 2021a). This declaration came less than a day after the U.S. Bureau of Reclamation declared a first-ever shortage in the Colorado River Basin (City of Manhattan Beach 2021a, BOR 2021). As a result, the City's treated imported water supplies from MWD, through WBMWD, could be impacted during a multi-year drought or other conditions which limit MWD from delivering sufficient water supplies to all of its member agencies, and consequently to the City (City of Manhattan Beach 2021a). The MWD has indicated that its supplies from the Colorado River will not be impacted in 2022 but may be impacted in 2023 and more likely in 2024, if the drought continues (City of Manhattan Beach 2021a).

The City is in the process of preparing and updating their 2020 Urban Water Management Plan (UWMP) to be in compliance with the UWMP Act (California Water Code Section 10610) and the Water Conservation Bill of 2009 (SBX7-7) (City of Manhattan Beach 2021a). The 2020 UWMP also incorporates the City's Water Shortage Contingency Plan (WSCP), which details how the City responds in the event of a declared water emergency or water shortage conditions. According to the draft 2020 UWMP, the City has reviewed its historical water demands to determine the projected water demands and water supply reliability and determined that the City is able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive year drought period (City of Manhattan Beach 2021a).).

## 3.19.2 Regulatory Setting

### Federal

#### Clean Water Act

The federal Clean Water Act, United States Code, Title 33, Sections 1251 et seq. requires that wastewater be treated prior to being discharged to waters of the United States. The Clean Water Act is described in further detail in Section 3.10, Hydrology and Water Quality, of this ND.

### State

#### Porter-Cologne Water Quality Control Act

In California, the State Water Resources Control Board and nine Regional Water Quality Control Boards (RWQCBs) are responsible for implementing the Clean Water Act and the California Porter-Cologne Water Quality Control Act

(Porter-Cologne Act). The Porter-Cologne Act authorizes the State Water Resources Control Board to implement programs to control polluted discharges into State waters. In compliance with the Porter-Cologne Act, the nine RWQCBs establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge.

### Sanitary Sewer General Waste Discharge Requirements

On May 2, 2006, the State Water Resources Control Board adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than one mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system in order to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan. The General Waste Discharge Requirements also requires that storm sewer overflows be reported to the State Water Resources Control Board using an online reporting system.

### Chapter 727, Statutes of 2005 – Water and Sewer Service Priority

Chapter 727, Statutes of 2005 (SB 1087) establishes processes to ensure the effective implementation of Government Code Section 65589.7, the statute requiring preparation of the housing element component off a General Plan. This statute requires local governments to provide a copy of the adopted housing element to water and sewer providers. In addition, water and sewer providers must grant priority for service allocations to proposed developments that include residential dwelling units affordable to lower-income households.

## Regional/Local

### Water Quality Control Plans (Basin Plans)

The Porter-Cologne Act, Section 13000, directs each RWQCB to develop a water quality control plan (Basin Plan) for all areas within its region. The Basin Plan is the basis for each RWQCB's regulatory program. The City is within the purview of the Los Angeles RWQCB (Region 4), and future development facilitated by the HEU must comply with applicable elements of the Basin Plan for Region 4. The Basin Plan gives direction on the beneficial uses of State waters, describes the water quality that must be maintained, and provides programs necessary to achieve the standards established in the Basin Plans.

### City of Manhattan Beach Master Plans

#### **Wastewater System Master Plan (2010)**

The objective of the Wastewater Master Plan is to evaluate the City's sewer collection system to provide a framework for undertaking the construction of new and replacement facilities for the service area in an efficient and cost effective manner. It is designed to aid the City in meeting some of the requirements of the Statewide General Waste Discharge Requirements issued by the California Regional Water Quality Control Board in 2006.

#### **Water Master Plan (2010)**

The purpose of the Water Master Plan (WMP) is to periodically evaluate the City's water system and provide a framework for undertaking the construction of new and replacement facilities for serving the water supply and

distribution needs in an efficient manner. The WMP report presents the methodology, analyses, findings, and recommendations of a comprehensive study of the City's potable water system and describes the water system supplied by the West Basin Municipal Water District.

### **Draft 2020 Urban Water Management Plan (2021)**

The City is a water supplier and is required to prepare an Urban Water Management Plan (UWMP) in accordance with the California Urban Water Management Planning Act (UWMP Act) (California Water Code Section 10610) and the Water Conservation Bill of 2009 (SBX7-7) The Act requires every "urban water supplier" to prepare and adopt a Plan, periodically review its Plan at least once every five years and make any amendments or changes which are indicated by the review. Pursuant to California Water Code Section 10617, an "Urban Water Supplier" is defined as a supplier, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The primary objective of the UWMP Act is to direct urban water suppliers to evaluate their existing water conservation efforts and, to the extent practicable, review and implement alternative and supplemental water conservation measures. The UWMP Act is directed primarily at retail water purveyors where programs can be immediately affected upon the consumer.

The City is in the process of preparing and updating the 2020 UWMP (City of Manhattan Beach 2021). Projected population in the City's service area is based on projections obtained from SCAG's 2020-2045 RTP/SCS (City of Manhattan Beach 2021). The SCAG data incorporates demographic trends, existing land use, general plan land use policies, and input and projections from the Department of Finance and the U.S. Census Bureau.

### City of Manhattan Beach General Plan

Goal I-7: Maintain and protect a reliable and cost-effective water supply system capable of adequately meeting normal demand and emergency demand in the City.

Policy I-7.1: Periodically evaluate the entire water supply and distribution system to ensure its continued adequacy, reliability, and safety.

Policy I-7.2: Ensure that all new development or expansion of existing facilities bears the cost of providing adequate water service to meet the increased demand which it generates.

Policy I-7.3: Educate the public in the importance of water conservation and require new development to comply with local and state codes for water conservation.

Policy I-7.4: Support expanded use of reclaimed water.

Policy I-7.5: Support the exploration of the feasibility of desalinated seawater as a reliable potable water source.

Goal I-8: Maintain a sewage system adequate to protect the health and safety of all Manhattan Beach residents and businesses.

Policy I-8.1: Evaluate the sewage disposal system periodically to ensure its adequacy to meet changes in demand and changes in types of waste.



Policy I-8.2: Ensure that all new development or expansion of existing facilities bears the cost of expanding the sewage disposal system to handle the increased load, which they are expected to handle.

Goal I-12: Protect the quality of the environment by managing the solid waste generated in the community.

Policy I-12.1: Encourage maximum recycling in all sectors of the community, including residential, commercial, industrial, institutional, and the construction industry.

Policy I-12.3: Encourage the maximum diversion of construction and demolition materials.

### 3.19.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

**Less Than Significant Impact.** Pursuant to Chapter 727, Statutes of 2005 (SB 1087) the City is required to deliver its adopted Housing Element and any amendments thereto to local water and sewer service providers. This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects. The City is the direct provider of water, sewer, and storm drain maintenance. As such, the City will internally coordinate with the Public Works Department for review and consideration when reviewing new residential projects. Program 24, Priority Services, of the proposed HEU would require coordination with the City of Manhattan Beach Public Works Department to ensure that adopted policies prioritize water and sewer allocation for affordable housing development facilitated by the HEU.

All existing capacity parcels selected in the HEU sites analysis were reviewed for any known environmental constraints, sewer and water capacity, and dry utilities. The sites included in the existing sites inventory all have access to existing sewer and water capacity, dry utilities, and are not constrained by known site-specific or environmental constraints that would limit development. Potential sites in the CG and PD Districts that require an overlay or rezoning to permit residential uses were also included in the site analysis based on the Adequate Sites Program included in the HEU required to address a RHNA shortfall.

While some potential sites for rezoning do not meet the underutilized criteria (particularly related to inappropriate zoning), any future rezoning or residential development facilitated by the HEU would require further review under CEQA, which would include a requirement to determine if the project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Goals and policies provided for in the General Plan also explicitly require the City to plan for and have the capacity to respond to fluctuating levels of utilities demand. For example, Goals I-8 and Policies I-8-1 and I-8-2 of the General Plan require that the City maintain a sewage system adequate to protect the health and safety of all Manhattan Beach residents. This includes conducting periodic evaluation of the sewage disposal system to ensure its adequacy to meet changes in demand, as well as ensuring that all new development or expansion of existing facilities bears the cost of expanding the sewage disposal system to handle the increased load. Further, Goal I-7 mandates the provision of a reliable and cost effective water supply system capable of adequately meeting normal demand and emergency demand while Policy I-7.2 requires periodic evaluation of the entire water distribution system, and would ensure that all new development or expansion of existing facilities bears the cost of providing adequate water service to meet the increased demand which it generates (City of Manhattan Beach 2003). These goals and policies are supported and facilitated by the MBMC requirements, as per the General Plan.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and are unlikely to require expansion of existing systems or the construction of new systems. However, project level review of future development anticipated by the HEU, as required under CEQA, would ensure that

all impacts to the existing utilities facilities are less than significant. The HEU would not change or alter policies related to utilities and system services. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

**b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

**Less Than Significant Impact.** The City's water supply sources include treated groundwater through the West Coast Basin (WCB), treated imported water purchased from MWD through WBMWD, and recycled water supplies from WBMWD (City of Manhattan Beach 2021a). The City's main source of water supply is purchased imported water from MWD through WBMWD (City of Manhattan Beach 2021a). As discussed above in Section 3.19.1, Environmental Setting, the Bureau of Reclamation declared a first-ever water shortage in the Colorado River Basin (BOR 2021). The MWD has indicated that its supplies from the Colorado River will not be impacted in 2022 but may be impacted in 2023 and more likely in 2024, if the drought continues (City of Manhattan Beach 2021a). As such, imported water supplies to the City, through WBMWD, may be impacted in the event MWD implements its Water Supply Allocation Plan (WSAP) due to a water supply shortage. The WSAP provides a means of equitably providing reduced water supplies to each of MWD's member agencies for up to 10 levels of reduction representing up to a 50% reduction (City of Manhattan Beach 2021a). Among other things, the WSAP would implement higher rates for increased use among its member agencies, including the WBMWD and by extension, the City (City of Manhattan Beach 2021a). In the event the WSAP is implemented by the MWD, the City has prepared a Water Shortage Contingency Plan (WSCP) in tandem with the 2020 UWMP update (City of Manhattan Beach 2021a). The City's plan for water usage during periods of shortage is designed to incorporate six standard water shortage levels corresponding to progressive ranges from up to 10, 20, 30, 40, and 50% shortages and greater than a 50% shortage (City of Manhattan Beach 2021a). A full listing of all the restrictions and prohibitions associated with each shortage level is provided in Section 8.4.1 of the City's draft 2020 UWMP (City of Manhattan Beach 2021a). The WSCP also includes permanent water conservation measures related to landscaping irrigation, cleaning and car washing, decorative water features, eating and drinking establishments, hotels, and commercial establishments (City of Manhattan Beach 2021a).

As discussed above, imported water from the MWD is not the City's sole water supply source. The City also extracts water from the Silverado aquifer of the WCB, where it has an adjudicated right of approximated 1,130 AFY. In addition, the WCB Judgment, amended in September 2014, allows up to an additional 10,000 acre-feet of emergency pumping over a four (4) month period in the WCB under specified conditions, which must be shared across all parties of the WCB Judgment, including the City. In addition to groundwater, the City has purchased from the WBMWD and supplied recycled water to customers for non-potable irrigation uses since 1995 (City of Manhattan Beach 2021a). The City has coordinated the preparation of its 2020 UWMP with WBMWD, and will continue to coordinate with WBMWD and take advantage of opportunities to expand recycled water facilities throughout its borders to allow for optimization of recycled water use within the City (City of Manhattan Beach 2021a).

The City has also adopted a revised Water Conservation Ordinance, which is actively enforced during drought situations and specifies water conservation requirements. Enforcement includes patrolling to educate customers and if necessary, issuing warnings and citations for violations. All citations and violations are reported annually (City of Manhattan Beach 2021a). According to the draft 2020 UWMP, the

City has determined that it is able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive year drought period (City of Manhattan Beach 2021a).

Ultimately, the HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and is unlikely to require expansion of existing systems or the construction of new systems. However, project level review as required under CEQA would ensure that all impacts to the existing utilities facilities are less than significant. The HEU would not change or alter policies related to utilities and system services and the City would therefore have sufficient water supplies for the project and reasonably foreseeable future development pursuant to the project. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- c) ***Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

**Less Than Significant Impact.** The City owns, operates, and maintains its local wastewater collection and pumping system. Collected effluent is treated at the Joint Water Pollution Control Plant (JWPCP) in the City of Carson, operated by the Los Angeles County Sanitation Districts (LACSD). According to the General Plan, the collection system adequately serves the City. The City has undertaken a complete inspection of the entire system via videotaping, and priorities for line replacement have been established to ensure long-term reliability (City of Manhattan Beach 2003). In 2015, LACSD's JWPCP had a treatment capacity of approximately 400 million gallons per day and the total volume of wastewater collected from the City's service area was 3,340-acre feet, or approximately 2,981,759 gallons per day (City of Manhattan Beach 2017), which represented less than 1% (or approximately 0.75%) of the total JWPCP capacity.<sup>13</sup> As such, it is unlikely that the increased demand on the wastewater system associated with 774 required RHNA units would have a substantial impact, given that the City's historic total annual generation represents only a small fraction of the treatment provider's total capacity (0.75%).

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<sup>13</sup> The total collected wastewater from the City was converted from 3,340 acre feet per year to gallons per day by multiplying the volume over time value by 893, resulting in 2,981,759 acre feet per year. The acre feet value was then divided by the total capacity of the JWPCP to arrive at .75%.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and are unlikely to require expansion of existing systems or the construction of new systems. However, project level review as required under CEQA would ensure that all impacts to the existing utilities facilities, including facilities maintained by the wastewater treatment provider, are less than significant. The HEU would not change or alter policies related to wastewater treatment systems or services. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- d) ***Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

**Less Than Significant Impact.** Goal I-12 of the City's General Plan mandates the City protect the quality of the environment by managing the solid waste generated in the community (City of Manhattan Beach 2003). This mandate is supported by Policies I-12.1 and I-12.3, which encourage maximum recycling in all sectors of the community, including residential developments, and encouraging maximum diversion of construction and demolition materials.

The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems and are unlikely to require expansion of existing systems or the construction of new systems. However, project level review as required under CEQA would ensure that all impacts to the existing utilities facilities, including waste management facilities, are less than significant. The HEU would not change or alter policies related to waste management system services. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- e) ***Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

**Less Than Significant Impact.** The HEU is a policy document, consisting of a housing program; no actual development is proposed as part of the update. Therefore, its adoption would not, in and of itself, produce environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation. The development anticipated by the HEU would occur primarily on infill sites already served by well-established utilities service systems which are unlikely to require expansion of existing systems or the construction of new systems (City of Manhattan Beach 2003). Any future development projects facilitated by the HEU would be required to comply with all applicable federal, State, and local regulations to avoid potential impacts related to the solid waste facilities, and project level review as required under CEQA would ensure that all impacts to the existing utilities facilities, including solid waste facilities, are less than significant. Approval of the HEU itself, as a policy document, would not change these regulations, and would not provide any goals, policies, or programs that would result in noncompliance with the applicable regulatory environment. Therefore, impacts from the HEU related solid waste would be less than significant, and no mitigation is required.

## 3.19.4 References

- BOR (U.S. Bureau of Reclamation). 2021. *Reclamation announces 2022 operating conditions for Lake Powell and Lake Mead*. August 16, 2021. Accessed October 7, 2021. <https://www.usbr.gov/newsroom/#/news-release/3950>.
- City of Manhattan Beach. 2003. City of Manhattan Beach General Plan. Accessed October 3, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.
- City of Manhattan Beach. 2017. 2015 Urban Water Management Plan. Accessed October 3, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/34878/636547389049430000>.
- City of Manhattan Beach. 2021a. 2020 Urban Water Management Plan (Draft). Accessed October 7, 2021. <https://www.manhattanbeach.gov/home/showpublisheddocument/48186/637698204957230000>.
- City of Manhattan Beach 2021b. Notice of Public Hearing: 2020 Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan. Accessed October 7, 2021. <https://www.manhattanbeach.gov/Home/Components/News/News/4957/43>.
- NOAA (National Oceanic and Atmospheric Administration)/ NIDIS (National Integrated Drought Information System). 2021. Current U.S. Drought Monitor Conditions for California. Accessed October 7, 2021. <https://www.drought.gov/states/california>.

## 3.20 Wildfire

### 3.20.1 Environmental Setting

Per California Government Code Section 51177A, a wildfire is an unplanned, unwanted wildland fire (i.e. a fire that originates in a non-built environment), including unauthorized human-caused fires, escaped wildland fire use events, escaped prescribed fire events, and all other wildland fires where the objective is to extinguish the fire. A wildland-urban interface (WUI) is an area where urban development is adjacent or in close proximity to open space or “wildland” areas (FEMA 2021). CAL FIRE has mapped areas of significant fire hazards in the State, which recognizes areas prone to wildfire hazards. According to the City’s General Plan, due to the City’s built out nature and urbanized adjacent communities, urban fires represent the sole fire threat in the City.

### 3.20.2 Regulatory Setting

#### Federal

##### Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; supports

implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency (County of Los Angeles 2014).

## State

### California Health and Safety Code Section 13000 et seq.

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code [CBC] noted below), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

### California Code of Regulations Title 24, Part 2

The State of California provided a minimum standard for building design through the 2019 CBC, which is located in Part 2 of Title 24 of the California Code of Regulations. This part incorporates by adoption the 2018 International Building Code of the International Code Council with necessary California amendments. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

### California Code of Regulations Title 24, Part 9

Part 9 of Title 24 of the California Code of Regulations refers to the 2019 California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This code is preassembled with the 2000 Uniform Fire Code of the Western Fire Chiefs Association. This part incorporates by adoption the 2018 California Fire Code of the International Code Council with necessary California amendments.

### California Public Resources Code Sections 4201–4204

This section of the California Public Resources Code was amended in 1982 to require the California Department of Forestry to classify all State Responsibility Areas (SRAs) into fire hazard severity zones (FHSZs). The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be used to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

## State Responsibility Area Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry and Fire Protection)

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRAs. Title 14 mandates that the future design and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures.

### Local/Regional

#### Fire Hazard Severity Zones

According to the California Department of Forestry and Fire Protection (CAL FIRE) (2021) while most of California is subject to some degree of fire hazard, there are specific features that make some areas more hazardous. CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These designations, referred to as Fire Hazard Severity Zones (FHSZ), mandate how people construct buildings and protect property to reduce risk associated with wildland fires. The maps were last updated in 2007-2010. They are currently being updated to incorporate improved fire science, data and mapping techniques. The proposed Fire Hazard Severity Zone maps denote lands of similar hazards where the state has financial responsibility for wildland fire protection, known as state responsibility area or SRA, and will be available for review and public comment. It is anticipated that in late 2020 or 2021 CAL FIRE will produce Fire Hazard Severity Zone maps for the areas of California where local governments have financial responsibility for wildland fire protection, known as Local Responsibility Area or LRA. Per law, only lands zoned as Very High Fire Hazard Severity are identified within local responsibility areas (CAL FIRE 2021a).

### Local

#### City of Manhattan Beach General Plan

The following General Plan goals and policies are applicable to the HEU related to wildland fires.

Goal CS-1: Minimize the risks to public health, safety, and welfare resulting from natural and human caused hazards.

Policy CS-1.1: Prepare and disseminate information to residents and businesses on preparing for and responding to natural disasters and threats to public safety.

Policy CS-1.2: Encourage and assist the school district in teaching children annually to respond appropriately in an emergency and to threats to personal safety.

Policy CS-1.3: Ensure that public and private water distribution and supply facilities have adequate capacity and reliability to supply both everyday and emergency fire-fighting needs

Goal CS-3: Maintain a high level of City emergency response services.

Policy CS-3.1: Support the continued active enforcement of the building and fire code.



Policy CS-3.3: Inform all residents of the requirements for visible and clearly legible street numbers to minimize the response time of emergency personnel.

Policy CS-3.4 Ensure that street signs are legible and easy to find by both emergency response personnel and the general public.

Policy CS-3.5: Review the City’s emergency equipment and shelters periodically to ensure that they are adequate to meet the needs of changing land uses and development and types of disasters.

Policy CS-3.6: Review the location, size, and equipment at each designated emergency shelter periodically to ensure that the City will be able to accommodate all people likely to need shelter in the event of a disaster.

Policy CS-3.7: Support the use of the best available equipment and facilities to ensure safety that meets the changing needs of the community.

Policy CS-3.9 Continue to upgrade the quality of emergency response through continued education and training of emergency response personnel.

Policy CS-3.10: Strive to reduce emergency response time

### 3.20.3 Environmental Impacts

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan;*
- b) *Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;*
- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or*
- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

**No Impact.** Based on the CAL FIRE’s Fire Hazard Severity Zones maps (CAL FIRE 2021), the City, is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones (VHFHSZ). As such, risk of wildfire is essentially non-existent. Additionally, the HEU is a policy document and adoption would not, in and of itself, result in negative environmental impacts. Implementation of the programs contained in the HEU would accommodate future development required to meet the City’s RHNA allocation. However, given that no portions of the City lie within VHFHSZ, no impacts would occur.

### 3.20.4 References

CAL FIRE (California Department of Forestry and Fire Protection). 2021a. Fire Hazard Severity Zone. <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildfire-prevention-engineering/fire-hazard-severity-zones>.

CAL FIRE 2021b. Fire Hazard Severity Zone Viewer. Accessed October 2, 2021. <https://egis.fire.ca.gov/FHSZ/>.

City of Manhattan Beach. 2003. General Plan. Adopted 1988. Updated 2003. Accessed October 2, 2021. <https://www.manhattanbeach.gov/departments/community-development/planning-zoning/general-plan/final-general-plan>.

FEMA (Federal Emergency Management Agency). 2021. Wildland Urban Interface (WUI). Accessed October 5, 2021. <https://www.usfa.fema.gov/wui/>.

### 3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

**Less than Significant Impact.** As discussed in Section 3.4, Biological Resources, of this IS/ND, the City is completely developed and does not support sensitive vegetation, sensitive wildlife species, or sensitive habitat. Additionally, the no area of the City functions as a corridor for the movement of native or migratory wildlife. All future activities associated with the HEU would be conducted in the highly urbanized environment of the City. Construction noise related to projects accommodated by the HEU have the potential to disturb nesting birds potentially nesting in the trees and vegetation. However, these impacts would be temporary in nature and would address via compliance with the MBTA, which protects all migratory birds, including their eggs, nests, and feathers. Further, as described in Section 3.5 of this IS/ND, the City does not support any examples of major periods in California prehistory. However, the City does

contain a number of notable historic features, such as the Manhattan Beach State Pier, and historic residences such as Scott House and 2820 Highland Avenue. These features would be protected via compliance with existing State, and local regulations, including relevant CEQA statutes and guidelines.

As discussed throughout this IS/ND, the HEU is a policy document and adoption of the HEU alone would not produce environmental impacts. Although implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle, the HEU does not identify, describe, promote, entitle, or permit any particular residential development project. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time. As such, after compliance with the existing regulatory environment applicable to cultural and biological resources, the HEU would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant, and no mitigation is required.

The HEU does not change the allowed densities or type of development that may occur within the City at this time. The act of adopting the HEU does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered or threatened species; or historic resources. As discussed in Sections 3.1 through 3.19 of this IS/ND, impacts associated with the adoption of the HEU would either result in no impacts or less than significant impacts. As such, the HEU would not substantially degrade the quality of the environment, reduce habitat, cause habitat population decline, threaten plant and animal communities or substantially reduced the range of a species, or eliminate important examples of the major periods of California's history or prehistory. Therefore, impacts from the HEU would be less than significant, and no mitigation is required.

- b) ***Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)***

**Less than Significant Impact.** The HEU would not result in potentially significant project-level impacts. As discussed throughout this IS/ND, the HEU is a policy document and adoption of the HEU alone would not produce environmental impacts. Although implementation of the programs contained in the HEU would accommodate future development required to meet the City's 6<sup>th</sup> Cycle RHNA allocation, the HEU does not identify, describe, promote, entitle, or permit any particular residential development project. While a rezoning program is identified within the HEU, the actual rezoning of property within the City to accommodate RHNA allocations would occur at a future date and is not one of the discretionary actions being undertaken at this time.

All reasonably foreseeable future cumulative development in the City would be subject to the same land use and environmental regulations that have been described throughout this document. Furthermore, all development projects are guided by the policies identified in the City's General Plan and by the regulations established in the MBMC. Therefore, compliance with applicable land use and environmental regulations would ensure that environmental effects associated with the accommodation of future housing

development would not combine with effects from reasonably foreseeable future development in the City to cause cumulatively considerable significant impacts. Cumulative impacts would therefore be less than significant. No mitigation is required.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

**Less than Significant Impact.** As detailed throughout this IS/ND, the HEU in and of itself would not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, air quality, hazards and hazardous materials, noise, public services, or transportation. The HEU does not change the allowed densities or type of development that may occur within the City at this time. The act of adopting the HEU does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting human beings. As discussed in Sections 3.1 through 3.20 of this IS/ND, impacts associated with the adoption of the HEU would either result in no impacts or less than significant impacts. As such, the HEU would not have environmental effects causing substantial adverse effects on humans, impacts from the HEU would be less than significant, and no mitigation is required.

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# 4 Preparers

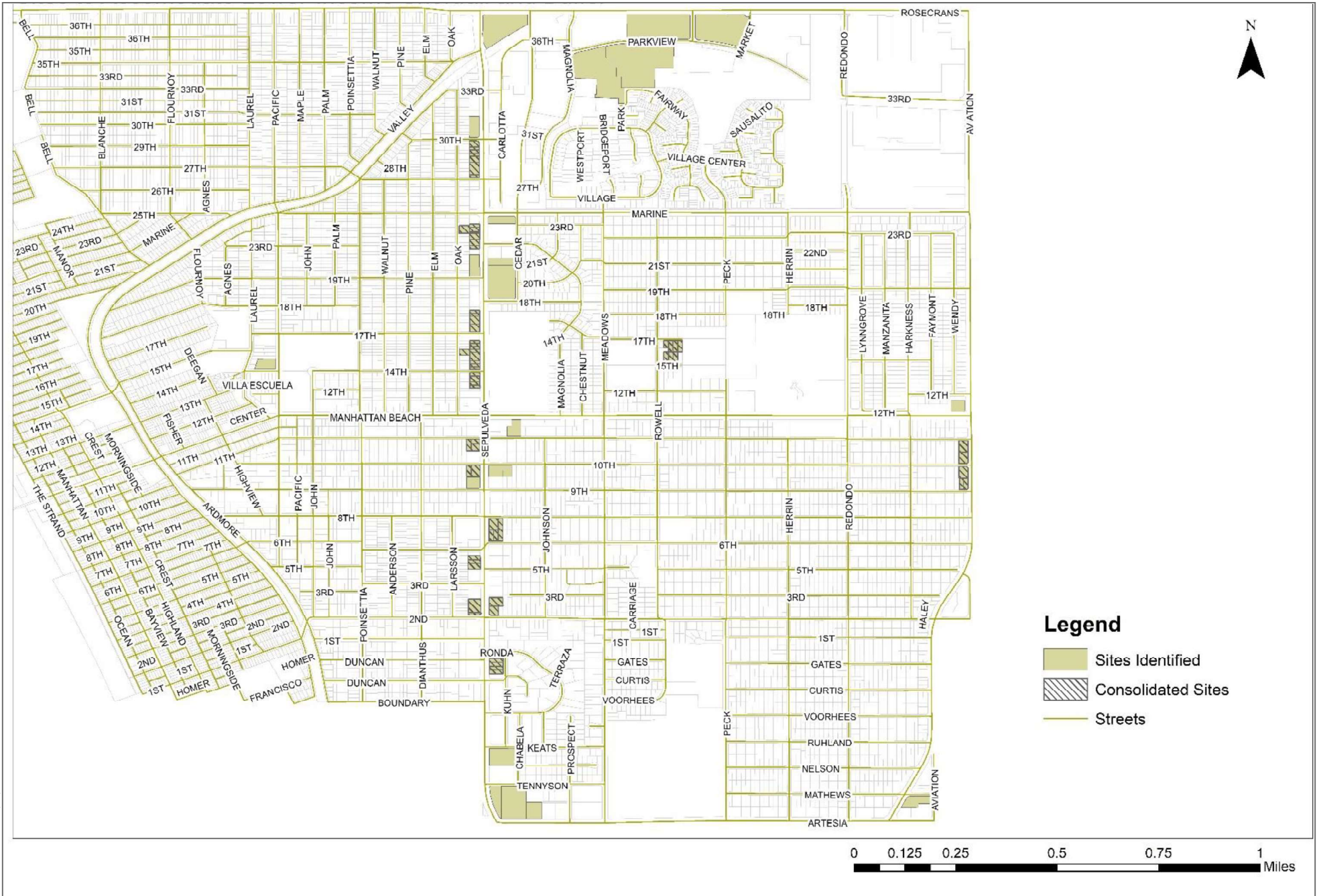
## 4.1 List of Preparers

### Dudek

Nicole Cobleigh, Project Manager  
Samantha Robinson, Environmental Planner  
Jennifer Reed, Air Quality Service Manager  
Ian McIntire, Air Resources Specialist

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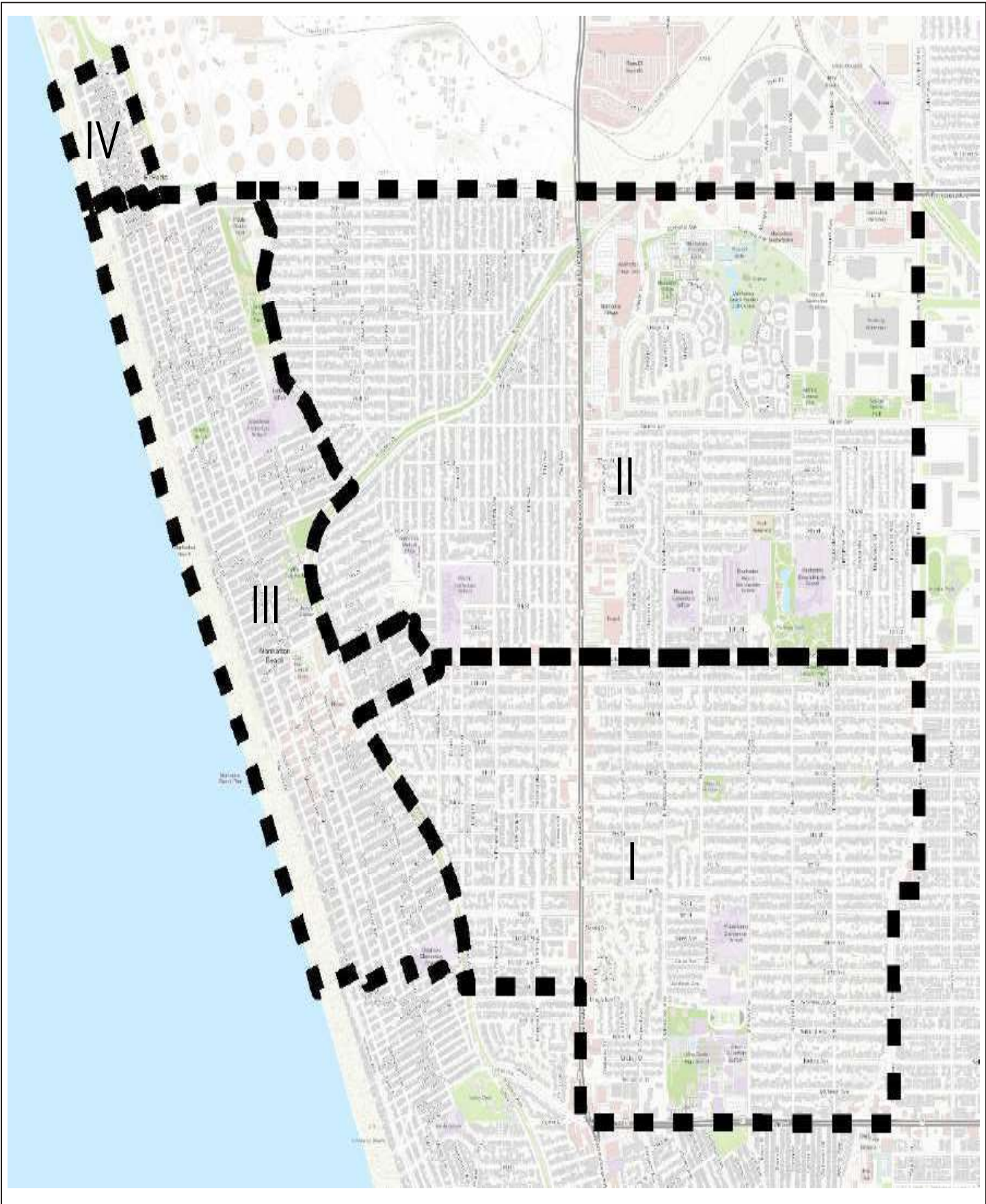


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SOURCE: City of Manhattan Beach

**FIGURE 2.2-1**  
**Potential Sites to Accommodate Lower-Income Shortfall**  
 IS/ND Manhattan Beach Housing Element Update  
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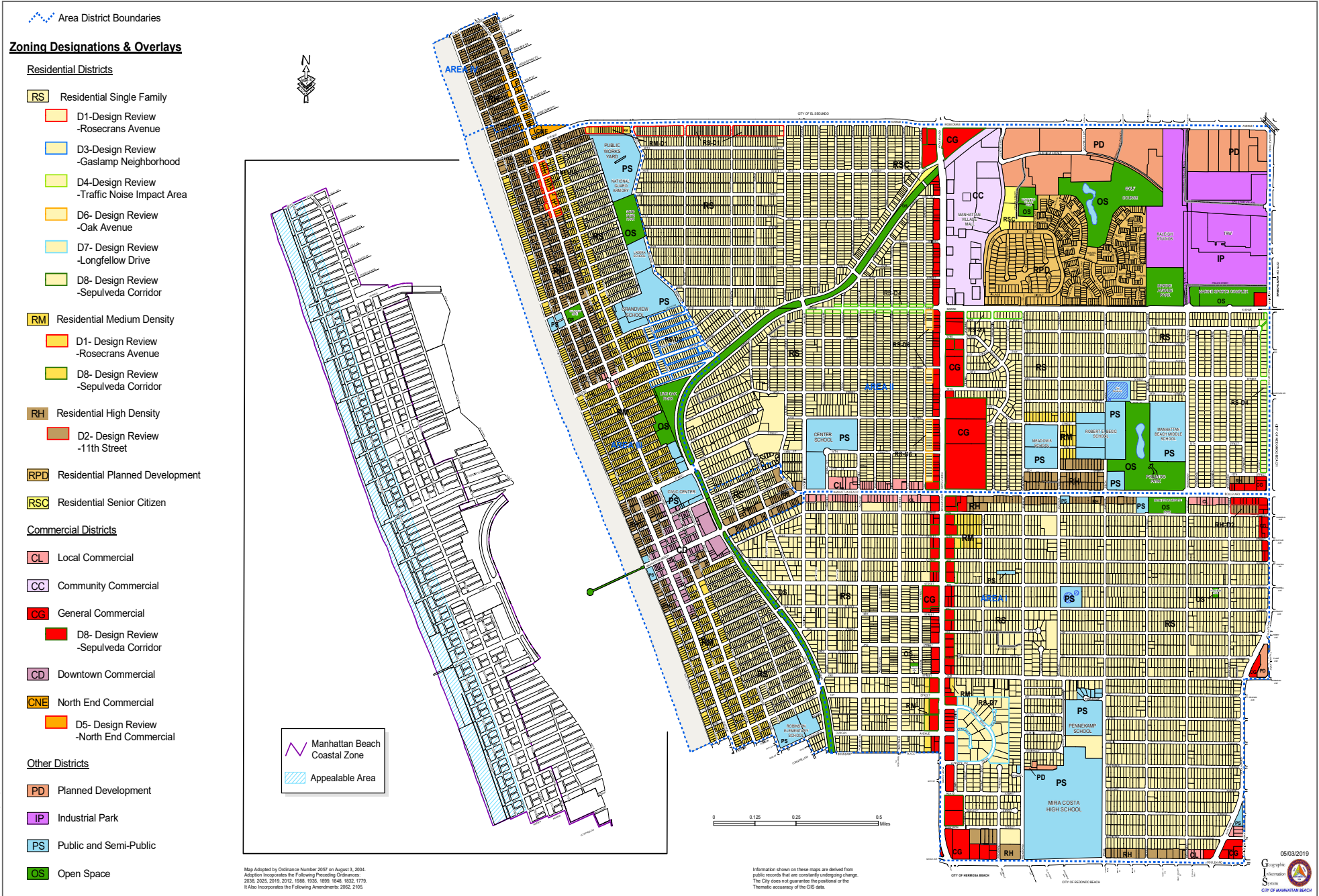


SOURCE: City of Manhattan Beach

**FIGURE 2.3-1**  
Area District Map

IS/ND Manhattan Beach Housing Element Update

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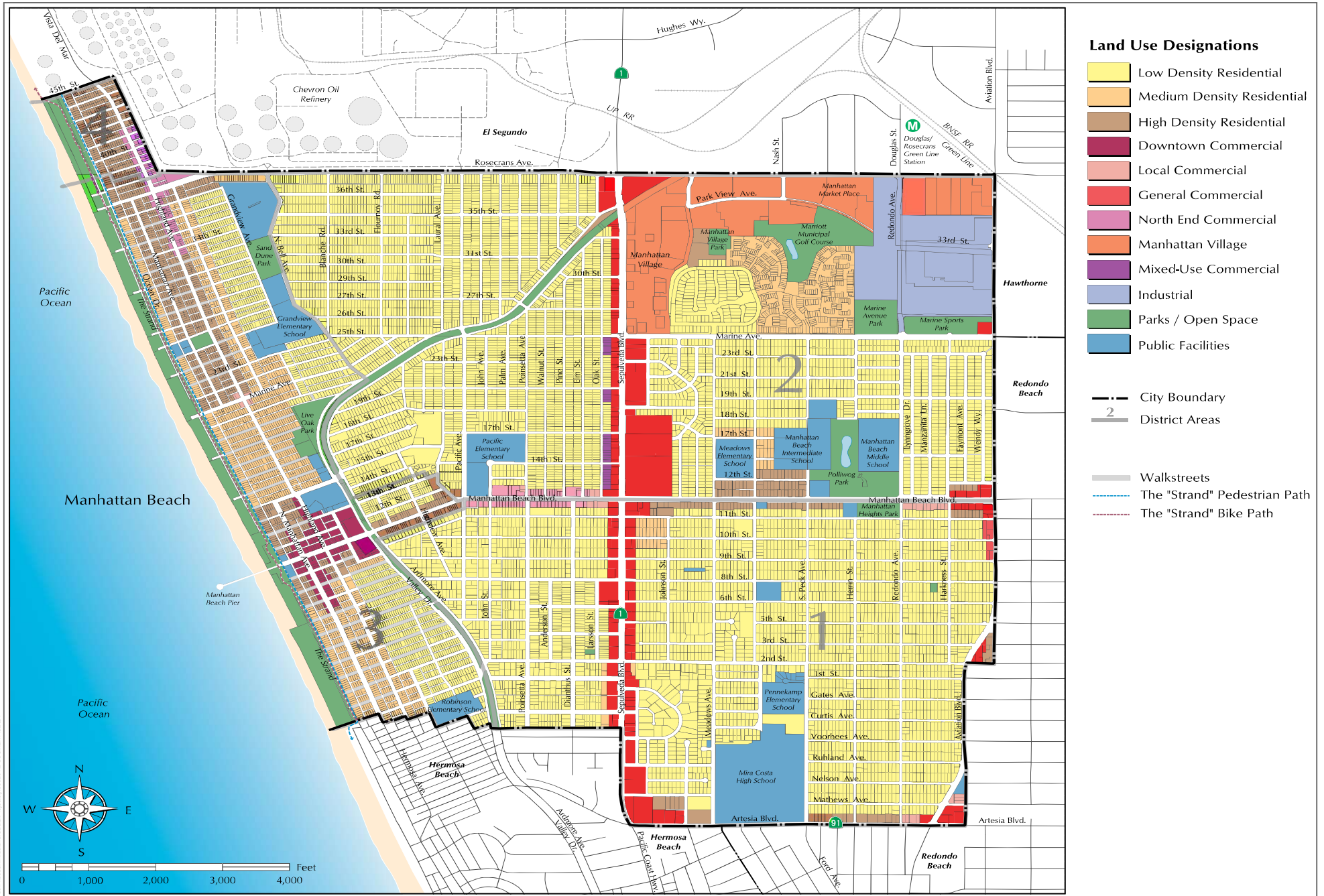


SOURCE: City of Manhattan Beach



**FIGURE 2.3-2**  
Existing Zoning

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SOURCE: City of Manhattan Beach

FIGURE 3.1-1

Existing Land Use

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# **ATTACHMENT A**

## Notice of Intent Comment Letter

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 266-3562  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

December 17, 2021

Talyn Mirzakhanian  
City of Manhattan Beach  
Community Development  
1400 Highland Avenue  
Manhattan Beach, CA 90266

RE: City of Manhattan Beach  
Housing Element Update 2021-2029  
SCH # 2021110408  
GTS # 07-LA-2021-03779

Dear Talyn Mirzakhanian:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced Draft Initial Study (IS). The project would amend the City of Manhattan Beach General Plan by replacing the current Housing Element with the proposed 2021-2029 Housing Element. The Housing Element Update will further the goal of meeting the existing and projected housing needs of all family income levels and provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) Allocation of 774 housing units through the year 2029. The Housing Element Update site inventory does not require zoning changes; however, a future rezoning program may be needed for additional housing needs required by HCD. The City of Manhattan Beach is the Lead Agency under the California Environmental Quality Act (CEQA).

The project covers the City of Manhattan Beach, which includes the State facility SR-1. From reviewing the Draft IS, Caltrans has the following comments:

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/>

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. Caltrans supports the use of TDM measures to decrease VMT. Implementing TDM strategies aligns with Caltrans's mission is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

Talyn Mirzakhianian  
December 17, 2021  
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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>

Caltrans looks forward to reviewing the CEQA documents of future housing developments that emerge from these plan and program updates, and collaborating with the City of Manhattan Beach on identifying TDM strategies to limit VMT from these future projects.

If you have any questions about these comments, please contact Diana DeGroot, the project coordinator, at [Diana.DeGroot@dot.ca.gov](mailto:Diana.DeGroot@dot.ca.gov), and refer to GTS # 07-LA-2021-03779.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

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**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



December 14, 2021

Carrie Tai, Director  
Community Development Department  
City of Manhattan Beach  
1400 Highland Avenue  
Manhattan Beach, CA 90266

Dear Carrie Tai:

**RE: City of Manhattan Beach 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the City of Manhattan Beach's (City) draft housing element received for review on October 15, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on December 13, 2021 with you, Talyn Mirzakhian, Planning Manager, and Erika Van Sickel and Janet Rodriguez, the City's Consultants.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the County to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: [http://opr.ca.gov/docs/OPR\\_Appendix\\_C\\_final.pdf](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and [http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

HCD appreciates the hard work and cooperation of you, Talyn Mirzakhian and rest of the housing element update team during the review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Divya Sen, of our staff, at [Divya.Sen@hcd.ca.gov](mailto:Divya.Sen@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager

Enclosure

## APPENDIX CITY OF MANHATTAN BEACH

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

### **A. Housing Needs, Resources, and Constraints**

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Integration and Segregation: The element provided some data on integration and segregation. The element must also discuss and analyze this data for trends over time and patterns across census tracts particularly for race and income. Additionally, it must evaluate patterns at a regional basis, comparing the City to the region.

Disparities in Access to Opportunity: The element includes limited local data on access to opportunity, but no regional data and analysis on access to transportation and environmental opportunities. The element should include complete data on disparities in access to opportunity and evaluate patterns at a local and evaluate both local and regional patterns and trends, including impacts on access to opportunity for protected characteristics.

Disproportionate Housing Needs: including Displacement: The element includes some data on cost-burdened households, overcrowding, and substandard housing at a City level but should also include analysis at a regional level for cost-burdened and overcrowded households. In addition, the analysis must address patterns and trends for displacement and homelessness.

Local Data and Knowledge, and Other Relevant Factors: While the element includes local data and knowledge (pp. 28 to 30 and p. 57), it must also include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.

Contributing Factors to Fair Housing Issues: The element identifies contributing factors to fair housing issues. In addition, the element should prioritize these factors

to better formulate policies and programs and carry out meaningful actions to affirmatively further fair housing (AFFH).

Goals, Priorities, Metrics, and Milestones: Goals and actions must create meaningful impact to overcome contributing factors to fair housing issues. Currently, programs are not sufficient to facilitate meaningful change and address AFFH requirements. Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions. In addition, Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Housing Characteristics: The element identifies the age of the housing stock (p. B-17). However, it must include analysis of the condition of the existing housing stock and estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

The City has a regional housing need allocation (RHNA) of 774 housing units, of which 487 are for lower-income households. To address this need, the element relies on vacant sites and nonvacant. To demonstrate the adequacy of these sites and strategies to accommodate the City's RHNA, the element must include complete analyses:

Sites Inventory: HCD understands some sites identified in the site inventory are City owned. The site inventory must identify which sites are City owned and how the City will be supporting development of these sites. In addition, how the City will comply with the Surplus Land Act Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5. For small sites that are City-owned that need lot-consolidation, the element should describe plans to facilitate lot-consolidation of these sites with privately-owned sites.



Realistic Capacity: The element should analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses (e.g., mixed-use). This analysis should consider the likelihood of 100 percent nonresidential development, performance standards, and development trends supporting residential development.

Small Sites: Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated, with sufficient evidence, that site. While the element includes some analysis to support lot consolidation, the element needs to relate this analysis and the characteristics of selected sites. The element should provide specific examples with the densities, affordability and, if applicable, circumstances leading to consolidation, such as common ownership. The element should relate these examples to the sites identified to accommodate the RHNA for lower-income households to demonstrate that these sites can adequately accommodate the City's lower-income housing need.

Suitability of Nonvacant Sites: While the element identifies factors for nonvacant sites (p. E-3), it must also describe the methodology used to determine the additional development potential within the planning period. This analysis must be included for both the sites with existing zoning and candidate sites for rezoning. For example, the element includes sites identified as a Masonic center, a church site, a country club, but no analysis was provided to demonstrate whether these existing uses would impede development of these sites within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).) For sites with residential uses, the inventory could also describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment.

In addition, specific analysis and actions are necessary because the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households and any candidate sites for rezone. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Accessory Dwelling Units (ADU): The element assumes an ADU buildout of 10 ADUs per year for a potential buildout of 86 units within the planning period. Given that the City has permitted 1 ADU average from 2018-2020, it is not clear if a production level

of 10 ADUs per year will be achievable over the planning period. As a result, the element should be updated to include supporting analysis for potential ADU production. Depending on the analysis, the element must commit to monitor ADU production throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element. In addition to monitoring production, this program should also monitor affordability (i.e., Program 1). Additional actions, if necessary, should be taken in a timely manner (e.g., within 6 months). Finally, if necessary, the degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land-Use Controls: The element must identify and analyze all relevant land use controls for impacts as potential constraints on a variety of housing types. The analysis must also evaluate the cumulative impacts of land use controls on the cost and supply of housing, including the ability to achieve maximum densities and cost and supply of housing. For example, the analysis should address the height limit of 30 feet for all zones (p. 13 – 14). The element should discuss how residential developments can achieve maximum allowable densities with the restrictions and the inability to provide flexibility per the voter initiative, and whether there is a standard of higher heights outside the coastal zone. Furthermore, the element states “parking requirements are most stringent for larger units and least stringent for smaller, more affordable units,” (p. 14) however, multifamily residential (smaller units) still requires 2 spaces per unit. The analysis should analyze parking standards particularly for studio and one-bedroom units. Finally, the element should describe how the local voter initiative allows incentives, concessions, and waivers and modifications to development standards under State Density Bonus Law. The element should include programs to address or remove the identified constraints.

Fees and Exaction: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis should describe the \$20,000 neighborhood overlay district application. In addition, it is unclear whether Table 9, which provides typical fees reflects of the fees identified in Appendix A.

Local Processing and Permit Procedures: While the element includes voter restriction as part of development standards (p. 12), the analysis should address how this

requirement may constraint the development of housing and how it applies to residential development in commercial ones. The discussion should also discuss any impact on the imposition of the overlay for proposed rezone and any interaction with density bonus law and the waivers, modifications and incentives allowed under the density bonus law.

Local Coastal Program: The element should describe what areas of the City are subject to coastal zone regulations (p. 15). The analysis should address intersections between City coastal preservation policies and the housing element strategy, policies and programs such as any impact on future or existing housing development within the designated coastal zone of the City. Specifically, the impact on the proposed overlay zone and whether Coastal Commission approval would be required.

Design Review: The element states that any new design review would be objective pursuant SB 330, but it does not commit to modify existing standards. The element must describe and analyze the design review guidelines and process, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply and affordability. For example, the analysis could describe required findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint or it must include a program to address this permitting requirement, as appropriate.

Zoning and Fees Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards and fees for each parcel on the jurisdiction's website.

Constraints on Housing for Persons with Disabilities: The element (Appendix C pp. 7 and 18) currently explains that residential care facilities serving seven or more persons are permitted with in RH Zones (Table 2). However, on page 18 it says residential care facilitates are allowed in the RH, RPD, RSC and CG zones with Conditional Use Permit and in the PS zone with a Use Permit. Residential care facilitates serving six or less are allowed in all residential zones but on Table 2 it says RS, RM, and RH zones. The element must be updated for consistency. The analysis should also address constraints on housing for persons with disabilities or residential care facilitate for seven or more persons, including excluding these uses from several residential zones subject to exception processes (e.g., use permit). The element should include actions as appropriate to remove or mitigate the constraints.

5. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

While the element quantifies the City's special needs populations (pp. B-20 to B24)., it must also analyze their special housing needs. For a complete analysis of each population group, the element should discuss challenges faced by the population, the existing resources to meet those needs (availability senior housing units, number of

large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

## **B. Housing Programs**

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

Programs must demonstrate that they will have a beneficial impact within the planning period. Beneficial impact means specific commitment to deliverables, measurable metrics or objectives, definitive deadlines, dates, or benchmarks for implementation. Deliverables should occur early in the planning period to ensure actual housing outcomes. Programs should be evaluated to ensure meaningful and specific actions and objectives. Programs containing unclear language (e.g., “Evaluate”; “Consider”; “Encourage”; “as needed” etc.) should be amended to include specific and measurable actions. For example:

*Program 3 Affordable Housing Streamlining:* Describe when the City will evaluate and amend Chapter 10.84 and provide specific commitments to remove governmental constraints relating to discretionary permit procedures.

In addition, programs that should be revised with discrete timelines (e.g., month and year) include: Program 4 (Affordable Senior Housing Preservation), Program 14 (Manufactured Housing), Program 25 (Specialized Housing Types to Assist Persons with Special Needs) and Program 21 (Reasonably Accommodate Housing for Persons with Physical and Developmental Disabilities).

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding A3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

*Program 1 Accessory Dwelling Unit Program:* The element must include specific commitments and actions to incentivize the production of ADU and include specific dates and actions for monitoring the development of ADU per the ADU projection assumptions in the sites inventory.

*Program 2 Adequate Sites:* The Program should also include a general description of the development standards that will be proposed for the overlay and ensure that standards will be adopted to facilitate development at the maximum densities allowed under the overlay.

*Program 13 Lot Consolidation Incentive:* Program 13 should provide specific commitments to facilitate lot consolidation and development of housing on small sites identified in the inventory. For example, the program could commit to (1) granting density bonuses above state density bonus law. (Gov. Code, § 65915.); (2) deferring fees specifically for consolidation; (3) expediting permit processing; (4) identifying and targeting specific financial resources; (5) modifying development standards, or (6) requests for proposals or assistance in parcel assemblage on city-owned sites. In addition, the program must identify specific timeframes for the City to implement each action outlined in the program.

*Program 22 Housing Replacement:* As the element identifies sites with existing residential uses, the Program must commit to replacing these units pursuant to the requirements as set forth in Government Code section 65915, subdivision (c)(3).

*Nonvacant Sites Reliance to Accommodate RHNA:* As the element relies upon nonvacant sites to accommodate the regional housing need for lower-income households, it should include a program(s) to promote residential development of those sites. The program(s) could commit to provide financial assistance, regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites. Examples of incentives include identifying and targeting specific financial resources and reducing appropriate development standards.

3. *The Housing Element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

The element must include a program(s) to assist in the development of housing affordable to low-, very low- and ELI households. Programs must be revised or added to the element to assist in the development of housing for ELI households. Program actions could include prioritizing some funding for housing developments affordable

to ELI households and offering financial incentives or regulatory concessions to encourage the development of housing types, such as multifamily, SRO units, to address the identified housing needs for ELI households.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding(s) A4, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, the element should be revised as follows:

*Program 15 Multifamily Residential Development Standards and Streamlining in the Mixed- Use (CL, CD, and CNE) Commercial Districts:* Provide specific timeframes for the City to implement actions. In addition, it is HCD's understanding that development standards will apply to the overlay zone, the Program should clarify and or commit to development standards that will facilitate the development at the proposed densities.

*Program to Mitigate Non-Governmental Constraints:* The element must be revised to include a program that mitigates non-governmental constraints that create a gap in the jurisdictions ability to meet RHNA by income category. (Gov. Code, § 65583.2, subd. (c)(3).)

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element must include a complete analysis of affirmatively further fair housing AFFH. Based on the outcomes of that analysis, the element must add or modify programs. In addition, Program 11 (Fair/Equal Housing) should include specific commitments to administer its programs and activities relating to housing and community development in a manner to AFFH and take no action that is materially inconsistent with its obligation to AFFH pursuant to Government Code section 8899.50.

### C. Public Participation

*Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd. (c)(8).)*

While the element includes a general summary of the public participation process (p. 5 and Appendix B and F), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element, specifically lower-income households. The element could describe the efforts to advertise and engage lower-income households in workshops and the Home Town faire, circulate the housing element to low- and moderate-income households and organizations that represent them and to involve such groups and persons in the element throughout the process. In addition, the element should also summarize the public comments and describe how they were considered and incorporated into the element.

In addition, HCD understands the City made the element available to the public after submitting for HCD's review. 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 in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.