RESOLUTION NO. 22-0137

RESOLUTION OF THE MANHATTAN BEACH CITY COUNCIL ADOPTING AN ADDENDUM TO A NEGATIVE DECLARATION PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND ADOPTING THE 6TH CYCLE (2021 – 2029) HOUSING ELEMENT, AS REVISED

THE MANHATTAN BEACH CITY COUNCIL 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. Accordingly, after extensive public engagement, the City Council adopted the 6th Cycle Housing Element ("Original HE") on March 22, 2022. After extensive dialogue with the State Department of Housing and Community Development ("HCD"), staff has drafted revisions to the Original HE to address HCD's comments, suggestions and requested revisions ("Revised HE").

SECTION 2. The City has engaged in robust public outreach concerning the 6th Cycle Housing Element, including but not limited to the following meetings, workshops, and study sessions:

- 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
- January 12, 2022 – Planning Commission Public Hearing
- February 1, 2022 – City Council Meeting
- February 4, 2022 – City Council Meeting
- February 9, 2022 – City Council Meeting
- February 15, 2022 – City Council Meeting
- March 22, 2022 – City Council Meeting
- September 14, 2022 – Planning Commission Meeting

SECTION 3. The Revised HE was released for public review on August 8, 2022 and submitted to HCD for review on August 15, 2022. On September 14, 2022, the Planning Commission considered the Revised HE and voted unanimously to recommend adoption of the Revised HE to the City Council.

SECTION 4. On September 23, 2022, the City Council held a duly noticed public hearing to consider the Revised HE, during which the City Council received a presentation by staff and provided an opportunity for members of the public to provide comments.

SECTION 5. The September 23, 2022 City Council public hearing was duly noticed on the City's website, at various locations including City Hall, in a newspaper of general circulation on September 8, 2022, and via email to interested parties.

SECTION 6. The City has reviewed the Project for compliance with the California Environmental Quality Act. The City Council previously adopted a Negative Declaration ("ND") for the Original HE per Resolution No. 22-0014. The anticipated environmental impacts of the Revised HE were explained in detail in an Addendum (incorporated by reference herein as "Exhibit A") to the ND, which concluded that no substantial changes are proposed in the Revised HE, and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previously approved ND due

to the involvement of new significant environmental effects. In addition, there is no "new information of substantial importance" as defined in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND adequately discusses the potential impacts of the project, and the City Council hereby adopts the Addendum.

SECTION 7. The Revised HE 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 on the analysis presented in revised Appendix E, Adequate Sites Analysis, of the Housing Element providing substantial evidence of the likelihood of the development or redevelopment on non-vacant sites with lower-income affordable housing units, the City Council finds, based on the substantial evidence and information provided in the record, that the existing uses on the sites identified in the site inventory to accommodate the lower-income Regional Housing Needs Allocation are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the housing element.

SECTION 9. Based upon the foregoing, the City Council hereby adopts the Revised HE, incorporated herein by reference and as "Exhibit B." The City Council authorizes staff to make non-substantive changes to the Housing Element as necessary to make it internally consistent, compliant with HCD requirements, and in conformity with the final City Council action on the project. Should HCD require substantial changes to the Housing Element adopted herein, staff shall bring such changes back to the City Council for review and adoption.

SECTION 10. City Council hereby incorporates by reference Resolution Nos. 22-0014 and 22-0015 and all findings therein, the staff report from Council's March 22, 2022 meeting (and all attachments thereto), and the staff report from Council's September 23, 2022 meeting (and all attachments thereto).

SECTION 11. The City Council'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 12. The City Clerk shall certify to the adoption of this Resolution.

ADOPTED on September 23, 2022.

AYES:
NOES:
ABSTAIN:
ABSENT:

STEVE NAPOLITANO
MAYOR

ATTEST:

LIZA TAMURA
City Clerk

Exhibits

Exhibit A:	Addendum to the Negative Declaration
Exhibit B:	Revised Housing Element

Exhibit A

Addendum

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

SEPTEMBER 2022

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADU	accessory dwelling unit
APN	Assessor's Parcel Number
CD	Downtown Commercial District
CEQA	California Environmental Quality Act
CG	General Commercial
City	City of Manhattan Beach
CL	Local Commercial District
CNE	North End Commercial District
County	County of Los Angeles
EIR	Environmental Impact Report
GHG	greenhouse gas
HCD	California Department of Housing and Community Development
HEU	City of Manhattan Beach 6th Cycle Housing Element Update
HVAC	heating, ventilation, and air conditioning
IS	Initial Study
JADU	junior accessory dwelling unit
LCP	Local Coastal Plan
MBMC	Manhattan Beach Municipal Code
MND	Mitigated Negative Declaration
ND	Negative Declaration
NOD	Notice of Determination
NOI	Notice of Intent
NPDES	National Pollution Discharge Elimination System
OS	Open Space
PD	Planned Development
RH	High-Density Residential District
RHNA	Regional Housing Needs Allocation
RM	Medium-Density Residential District
RS	Single-Family Residential District
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
TCR	tribal cultural resource(s)
VHFHSZ	Very High Fire Hazard Severity Zone

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1 Introduction

1.1 Purpose of Addendum

The City of Manhattan Beach (City) adopted an Initial Study (IS)/Negative Declaration (ND) for the 6th Cycle Housing Element Update (Originally Adopted HEU) in March 2022 (State Clearinghouse No. 2021110408). The Final IS/ND was prepared pursuant to the California Environmental Quality Act (CEQA) and contains a disclosure and analysis of potential environmental effects associated with implementation of the Originally Adopted HEU. Based on the analysis contained in the Final IS/ND, the Manhattan Beach City Council adopted the 6th Cycle Housing Element Update (HEU) on March 22, 2022.

State law empowers the California Department of Housing and Community Development (HCD) to review and certify cities' housing elements to ensure compliance with state housing element law (Government Code Article 10.6). Pursuant to Government Code Section 65585, subdivision (h), HCD reported the results of its review of the Originally Adopted HEU to the City in writing on June 3, 2022. According to HCD's review letter, revisions to the Originally Adopted HEU were necessary to fully comply with state housing element law. In response to HCD's June 3, 2022, review letter—provided as Appendix A, HCD Review Letter (June 3, 2022), of this Addendum—the City is proposing to revise the Originally Adopted HEU to fully comply with state housing element law. Proposed revisions include updates to Section 5, Goals and Policies, and Section 6, Implementation Programs, of the Originally Adopted HEU, as well as to the HEU's Appendix C, Constraints and Zoning Analysis, Appendix D, Affirmatively Furthering Fair Housing and Appendix E, Sites Analysis and Inventory. The recent Housing Element Update (HEU) revisions made in response to HCD's June 3, 2022, review letter will be referred to as the "Revised HEU" in this Addendum.

The previously adopted IS/ND (Final IS/ND) determined that the Originally Adopted HEU would not result in any significant environmental impacts and no mitigation measures were required. The purpose of this Addendum is to analyze the proposed revisions to the Originally Adopted HEU and to determine whether implementation of the Revised HEU would result in any new or different environmental impacts than those identified in the Final IS/ND for the Originally Adopted HEU. The Final IS/ND and Originally Adopted HEU are hereby incorporated by reference.

1.2 CEQA Compliance

Under CEQA, an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary, or none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent negative declaration have occurred (CEQA Guidelines Section 15164[b]). Pursuant to CEQA Guidelines Section 15162, when a negative declaration is adopted for a project, no subsequent EIR shall be prepared for a project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following (CEQA Guidelines Section 15162[a]):

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new

significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    C. Mitigation measures or alternative previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA recommends that a brief explanation of the decision to prepare an Addendum rather than a subsequent negative declaration be included in the record for a proposed project (CEQA Guidelines Section 15164[e]). This Addendum has been prepared because the Revised HEU is consistent with the Originally Adopted HEU evaluated in the Final IS/ND (State Clearinghouse No. 2021110408).

The Revised HEU does not require major revisions to the Final IS/ND because no new significant impacts would occur. The anticipated environmental impacts of the Revised HEU, as explained in detail in the following analysis and checklist, have been analyzed accordingly in the Final IS/ND prepared for the Originally Adopted HEU in January 2022, and there have been no new circumstances since that time that would result in new significant environmental impacts.

Per CEQA Guidelines Section 15164(c), an Addendum need not be circulated for public review, but can be included in or attached to the Final IS/ND. Prior to approval of the Revised HEU, the City will consider this Addendum together with the Final IS/ND when making a decision regarding the Revised HEU.

1.3 Project Overview

On March 22, 2022, the City Council adopted the City of Manhattan Beach General Plan Amendment: 6th Cycle Housing Element Update and Final IS/ND with the approval of City Council Resolution Nos. 22-0014 and 22-0015. The purpose of the Originally Adopted HEU is to provide an update to the Housing Element of City's General Plan. The HEU is a policy document that conceptualizes how the City will provide the capacity for a total of 774 housing units, as assigned by the Southern California Association of Governments (SCAG) during the 2021 thorough 2029 Regional Housing Needs Allocation (RHNA) planning period, referred to as the "6th Cycle RHNA". No development is proposed under the Originally Adopted HEU; however, implementation of the Originally Adopted HEU is designed to facilitate construction of 774 new dwelling units ("units") throughout the City. Additionally, the Originally Adopted HEU

includes programs that support the existing and future residents of the City, including future rezoning necessary to accommodate a community-wide "shortfall" of lower-income units, as discussed in further detail below.

The City is proposing to revise the Originally Adopted HEU per the June 3, 2022, HCD Review Letter (provided as Appendix A of this Addendum) to bring the City's General Plan Housing Element into compliance with Article 10.6 of the Government Code. The Originally Adopted HEU includes an adequate sites program (i.e., Program 2, Adequate Sites), which establishes an overlay district adhering to the standards set forth in Government Code Sections 65583.2 (h) and (i) to address shortfall and create opportunity for at least 406 units of multifamily housing for lower-income households. Sites identified for the adequate sites program overlay may be subject to future rezoning to accommodate additional housing necessary to satisfy the 6th Cycle RHNA. The Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would increase the number of lower-income RHNA units ultimately required to be accommodated though the adequate site program overlay from 406 to 412 (representing an increase of 6 units). Additionally, the Originally Adopted HEU identifies a total of 34 underutilized sites with the potential to accommodate 1,018 lower income units[1] and 5 buffer rezone sites with the potential to accommodate 26 lower-income units.

The Revised HEU would add one new site to the adequate sites program overlay (i.e., 1700 North Sepulveda Boulevard, Assessor Parcel Number [APN] 4166023016) identified within Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU and would include other slight revisions to the list of sites, APNs, and potential capacity identified in Table 15 and Table 16, Rezone Sites to Accommodate the Buffer, of Appendix E of the Originally Adopted HEU. These revisions would reduce the total capacity (i.e., the "realistic" lower-income unit capacity) on potential underutilized sites from 1,018 units to 844 (provided Table 15 of the Revised HEU) units and would increase the total capacity on 7 potential low-income buffer sites from 26 to 115 (provided in Table 16 of the Revised HEU). The Originally Adopted HEU identified a surplus of sites (i.e., 1,018) which could potentially be rezoned as part of a future action to accommodate additional lower-income RHNA units. Although the Revised HEU would add one site to this list (i.e., 1700 North Sepulveda Boulevard), most of the lower-income units required to satisfy RHNA in the Revised HEU would still be accommodated from amongst sites previously identified in Table 15 of the Originally Adopted HEU.

In addition to the above proposed changes, the Revised HEU would also do the following:

- Modify Program 3, Affordable Housing Streamline, of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the Local Commercial District (CL), Downtown Commercial District (CD), and North End Commercial District (CNE) zones;

- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues, as outlined in HCD's Affirmatively Furthering Fair Housing Guidance Memo (HCD 2021); and

- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

[1] As provided in Table 15 of Appendix E, Sites Analysis and Inventory, of the Revised HEU, "realistic" lower-income unit capacity is identified as 20 dwelling units per acre.

Proposed changes to the Originally Adopted HEU that could potentially result in physical impacts to the environment are discussed in further detail in Section 2.3, Revised HEU, of this Addendum.

The City, as lead agency for the Revised HEU, has the responsibility for reviewing, processing, and approving the Revised HEU. This document is an Addendum to the Final IS/ND to accommodate a subsequent discretionary action for the proposed HCD mandated revisions to the HEU. As such, the City will consider the following discretionary action:

- Approval of the City of Manhattan Beach General Plan Amendment: 6th Cycle Revised Housing Element Update

1.4 Previously Adopted Final IS/ND

As stated previously, the Final IS/ND for the Originally Adopted HEU was adopted on March 22, 2022. The Final IS/ND evaluated and analyzed the potential environmental impacts associated with the implementation of the Originally Adopted HEU. The Final IS/ND concluded that the Originally Adopted HEU would not result in any potentially significant environmental impacts. A Notice of Intent (NOI) was circulated for 34 days, from November 24, 2021, to December 27, 2021. During that time, one comment letter was received from the California Department of Transportation. A subsequent Notice of Determination (NOD) was filed on April 18, 2022.

2 Project Description

2.1 Project Location and Setting

The City of Manhattan Beach (City) is 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 City's General Plan Land Use Element as Low-Density Residential and zoned as Single-Family Residential District (RS). Medium-Density Residential District (RM) zone and High-Density Residential District (RH) zone areas extend eastward from the City's coastline and comprise much of the City's Local Coastal Program (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 Revised HEU include: the RM zone, in only Area District 3; 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.

2.2 Originally Adopted HEU

Each local government must demonstrate that it has planned to accommodate all its regional housing need allocation in its Housing Element. The City has been assigned total of 774 units for the 6th Cycle RHNA, which are further broken down by income level. 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.

Summary of Capacity to Accommodate RHNA

The Originally Adopted HEU identified an existing 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 accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs). Because the City does not have large swaths of land available for development, there were no opportunities to identify new housing capacity on undeveloped lands. With no vacant sites, the City's housing capacity was identified in the form of underutilized sites that are most suitable for redevelopment. To accommodate the 6th Cycle RHNA, the City prepared an analysis and inventory of sites within City limits that were suitable for residential development during the planning period. These sites were identified as a part of Program 2, Adequate Sites, of the Originally Adopted HEU. As provided below in Table 2-1, after calculating the City's existing 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 existed a shortfall of 406 units for the

lower-income RHNA category, plus the need to accommodate an additional 73 lower-income unit "buffer,"[2] for a collective shortfall of 479 units.

Table 2-1. Originally Adopted HEU: Total RHNA Compared to Credits and Capacity Identified

Category	Total Units	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units
RHNA	**774**	**487**	**155**	**132**
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
Totals	**377**	**81**	**163**	**133**
Capacity Deficit (-)/ Surplus (+)	**—**	**- 406**	**+8**	**+1**
Additional Capacity for Buffer Through Rezoning and Overlay	73	73		

Source: City of Manhattan Beach 2022

To accommodate the remaining lower-income RHNA, the City 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 6th Cycle RHNA eight-year planning period. This process, together with the potential sites identified to accommodate future lower-income RHNA units, is part of the Originally Adopted HEU's "adequate sites program" (i.e., Program 2). As proposed in the adequate sites program, the City would establish an "overlay" which is a regulatory planning tool that creates special provisions or makes allowances over an existing base zoning district to guide development within a specific area. The adequate sites program overlay established in the Originally Adopted HEU (as illustrated in Figure 2.2-1, Potential Sites to Accommodate the Lower-Income Shortfall, of the Final IS/ND) 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, 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. [3]

Furthermore, through implementation of Program 18, Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts, and to further incentivize affordable housing

[2] The capacity to accommodate an additional "buffer" of approximately 15% is recommended by HCD to ensure sufficient capacity exists to accommodate the RHNA throughout the eight-year planning period and comply with the provisions of Senate Bill 166 (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.

[3] For the purposes of CEQA, it is necessary to clarify that not all the sites identified in the adequate sites program overlay district would ultimately support additional residential development. Sites identified may be subject to future land use changes (e.g., zone changes) to accommodate the RHNA, however, these land use changes would be implemented through future actions, which are not considered part of the Originally Proposed HEU nor the Revised HEU.

in the City, the Originally Adopted HEU proposes to remove the discretionary requirements for multifamily housing meeting the minimum requirements for a state density bonus in the CL, CD, and CNE zones (as detailed in the Originally Adopted HEU's Program 11, Density Bonus). The underutilization of existing sites, paired with programs identified in the Originally Adopted HEU were intended to ensure that the City would realistically meet the RHNA targets at all income levels during the required eight-year planning period.

Summary of Housing Plan

As required by state housing element law, the Originally Adopted HEU includes a Housing Plan to facilitate and encourage the provision of housing. 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 implementation programs (specifically Program 1 through Program 31) in the Originally Proposed HEU are detailed in the Final IS/ND.

Scope of Analysis

No development is proposed under the Originally Adopted HEU, however, implementation of the Originally Adopted HEU is designed to facilitate construction of 774 new units throughout the City. Additionally, the Originally Adopted HEU includes programs intended to support the existing and future residents of the City, including the adequate sites program, which is necessary to accommodate the City's lower-income RHNA shortfall. Given the developed and built out nature of the City, new housing units facilitated as a result implementation for the Originally Adopted HEU may qualify for one or more categorical exemptions under CEQA—such as Class 3, Small Structures or Class 32, Infill Development Project—consistent with State CEQA Guidelines Section 15332, or for CEQA Streamlining and and/or other state laws to promote the development of infill affordable housing. As appropriate, the Final IS/ND analysis addressed the potential physical impacts associated with implementation of the Originally Adopted HEU.

2.3 Revised HEU

As previously discussed above in Section 1.1, Purpose of Addendum, state law empowers HCD to review and certify cities' housing elements to ensure compliance with state housing element law (as codified in Government Code Article 10.6). In accordance with the HCD's June 3, 2022, review letter—provided as Appendix A of this Addendum—the City is proposing to revise the Originally Adopted HEU to fully comply with state housing element law. Proposed revisions include updates to Section 5, Goals and Policies, and Section 6, Implementation Programs, of the Originally Adopted HEU, as well as to the HEU's Appendix C, Constraints and Zoning Analysis, Appendix D, Affirmatively Furthering Fair Housing, and Appendix E, Sites Analysis and Inventory, as further detailed, below.

The Revised HEU would continue implementation of the Originally Adopted HEU, including the adequate sites program, but would increase the total number of units required to accommodate the lower-income RHNA from 406 to 412 (representing an increase of 6 units). This increase in units is not due to an increase in the overall RHNA (which remains at 774). Rather, upon further analysis, it was determined that a City owned parking structure (i.e., Table ID No. 1, Rosecrans Avenue/Highland Avenue, within Table 7, Lower Income Sites Identified, of Appendix E,

of the Originally Adopted HEU) does not have capacity to support six net new lower-income units under existing conditions. Thus, the total existing capacity identified to support lower-income RHNA units would be reduced from 24 net new units in the Originally Adopted HEU to 18 net new units in the Revised HEU. The Revised HEU would also remove one site previously identified as having capacity to support six moderate-income RHNA units (i.e., Table ID No. 26, Highland/Rosecrans, in Table 8, Moderate Income Sites Identified, of Appendix E of the Originally Adopted HEU). As the Originally Adopted HEU identifies an existing surplus capacity of eight moderate-income units, the six unit decrease in existing moderate-income site capacity identified in the Revised HEU would not impact the total number of adequate sites program units required to satisfy the City's moderate-income RHNA. Pursuant to the Revised HEU, there would be an existing surplus capacity of two moderate income units. The underutilized sites capacity, total capacity, total capacity deficit/surplus, and additional capacity to accommodate a buffer in the Revised HEU are provided below in Table 2-2.

Table 2-2. Revised HEU: Total RHNA Compared to Credits and Capacity Identified

Category	Total Units	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units
RHNA	**774**	**487**	**155**	**132**
Underutilized Site Capacity	189* / *(201)*	18* / *(24)*	152* / *(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
Totals	**365* / *(377)***	**75* / *(81)***	**157* / *(163)***	**133**
Capacity Deficit (-)/ Surplus (+)	—	**- 412* / *(-406)***	**+2* / *(+8)***	**+1**
Additional Capacity for Buffer Through Rezoning and Overlay	73	73		

Source: City of Manhattan Beach 2022
Notes: Numbers provided in parentheses in the above Table 2.3-1 denote number of units included in the Originally Adopted HEU.
* Denotes a change compared to the Originally Adopted HEU.

As previously discussed in Section 1.3, Project Overview, of this Addendum, the Revised HEU would add one new site to the adequate sites program overlay (i.e., 1700 North Sepulveda Boulevard, APN 4166023016, with a realistic capacity of 89 lower-income units) and would include slight revisions to sites and/or APNs and the potential capacity identified in Table 15 and Table 16 of Appendix E of the Originally Adopted HEU. The sites identified in Table 15 and 16 of the Revised HEU are illustrated in Figure 1, Potential Sites to Accommodate Lower-Income Shortfall and Buffer. These proposed revisions in the Revised HEU would reduce the total capacity (i.e., the "realistic" lower-income unit capacity) from 1,018 units to 844 units and would increase the total capacity on 7 potential low-income buffer sites from 26 to 115. The two sites added to Table 16 of the Revised HEU were originally identified in Table 15 of the Originally Adopted HEU. The total acreage of land included within the adequate sites program overlay district would be reduced from 50.49 acres in the Originally Adopted HEU, to 42.75 acres in the Revised HEU, while the total acreage of land identified within the potential buffer sites would be increased from 3.96 acres to 8.47 acres. The Originally Adopted HEU identified a surplus of sites which could potentially be rezoned

as part of a future action to accommodate additional lower-income RHNA units. Although the Revised HEU would add one site to this list (i.e., 1700 North Sepulveda Boulevard), most of the 412 lower-income units required to satisfy the RHNA under the Revised HEU would still be accommodated from amongst sites previously identified in Table 15 of the Originally Adopted HEU.

In addition to minor revisions affecting existing capacity and adequate sites, the Revised HEU would modify Program 3, Affordable Housing Streamline, of the Originally Adopted HEU to remove discretionary review requirements for future multifamily projects within the CL, CD, and CNE zones, regardless of whether these projects would qualify for a density bonus. The removal of the density bonus qualification would result in slightly more development review streamlining than initially considered in the Final IS/ND for the Originally Approved HEU. The Revised HEU would also add discussion and analysis to each of the implementation programs (i.e., Section 6 of the Revised HEU) related to fair housing issues and would incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

The purpose of this Addendum is to evaluate the difference(s) between the Originally Adopted HEU and the Revised HEU and to determine if proposed changes would result in new significant environmental effects. The proposed increase of six lower-income RHNA units required to be accommodated through the adequate sites program, the addition of one site to the adequate sites program overlay, and the additional streamlining of future multifamily projects within commercial zones will be the focus of the analysis provided in Chapter 3, Initial Study Checklist, of this Addendum.

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3 Initial Study Checklist

1. **Project title:**

   City of Manhattan Beach General Plan Amendment: 6th 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 Mirzakhanian, 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 to the Housing Element Update or Addendum.

7. **Zoning:**

   Not applicable to the Housing Element Update or Addendum.

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):**

   In response to the California Department of Housing and Community Development's (HCD's) June 3, 2022, review letter—provided as Appendix A, HCD Review Letter (June 3, 2022), of this Addendum—the City of Manhattan Beach is proposing to revise its recently adopted General Plan Housing Element (referred to herein as the "Originally Adopted Housing Element Update [HEU]") to fully comply with state housing element law (Government Code Article 10.6). Proposed revisions include updates to Section 5, Goals and Policies, and Section 6, Implementation Programs, of the Originally Adopted HEU, as well as to the HEU's Appendix C, Constraints and Zoning Analysis, Appendix D, Affirmatively Furthering Fair Housing and

Appendix E, Sites Analysis and Inventory. The proposed revisions made to the previously adopted Housing Element will be referred to as the "Revised HEU" in this Addendum.

The Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay, but would increase the total number of lower-income RHNA units ultimately required to be accommodated within the adequate site program overlay district from 406 units to 412 units, which represents an increase of 6 RHNA "shortfall" units over the Originally Adopted HEU. The land use changes required to facilitate additional development on the sites identified in the adequate sites program overlay district would require future actions, which are not considered part of the "project" under review in the Final IS/ND or this proposed Addendum.

In addition to minor revisions affecting existing capacity and adequate sites, the Revised HEU would modify Program 3, Affordable Housing Streamline, of the Originally Adopted HEU to remove discretionary review requirements for future multifamily projects within the CL, CD, and CNE zones, regardless of whether these projects would qualify for a density bonus. The Revised HEU would also: add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues, as outlined in HCD's Affirmatively Furthering Fair Housing Guidance Memo (HCD 2021); and incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

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

The City of Manhattan Beach is in the southwest portion of Los Angeles 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 City's General Plan Land Use Element as Low-Density Residential and zoned as Single-Family Residential District (RS). Medium-Density Residential District (RM) zone and High-Density Residential District (RH) zone areas extend eastward from the City's coastline and comprise much of the City's Local Coastal Program (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 Revised HEU include: the RM zone, in only Area District 3; 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 is required for the Housing Element Update.

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.?

Not Applicable. Assembly Bill (AB) 52 requires that tribal cultural resources be evaluated under CEQA. However, pursuant to Public Resources Code Section 21080.3.1(b), AB 52 consultation does not apply in this case because the environmental document is not a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report and is instead an Addendum to a previously prepared CEQA document.

Environmental Factors Potentially Affected

New significant environmental effects or substantially more severe significant environmental effects compared to those identified in the previous CEQA document. The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☐ Aesthetics	☐ Agriculture 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	☐ Wildfire	☐ Mandatory Findings of Significance

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous approved ND or MND or certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, there is no "new information of substantial importance" as defined in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND or MND or previously certified EIR adequately discusses the potential impacts of the project without modification.

☒ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous approved ND or MND or certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, there is no "new information of substantial importance" as defined in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted ND, MND or previously certified EIR adequately discusses the potential impacts of the project; however, minor changes require the preparation of an ADDENDUM.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous adopted ND, MND or certified EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as defined in CEQA Guidelines Section 15162(a)(3). However, all new potentially significant environmental effects or substantial increases in the severity of previously identified significant effects are clearly reduced to below a level of significance through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT MND is required.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previously certified EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as defined in CEQA Guidelines Section 15162(a)(3). However, only minor changes or additions or changes would be necessary to make the previously certified EIR adequate for the project in the changed situation. Therefore, a SUPPLEMENTAL EIR is required.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous certified EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as defined in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT EIR is required.

Signature Date

Evaluation of Environmental Impacts

A finding of “No New Impact/No Impact” means that the potential impact was fully analyzed and/or mitigated in the prior CEQA document and no new or different impacts will result from the proposed activity. A brief explanation is required for all answers except "No New Impact/No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No New Impact/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 New Impact/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).

A finding of “New Mitigation is Required” means that the project have a new potentially significant impact on the environment or a substantially more severe impact than analyzed in the previously approved or certified CEQA document and that new mitigation is required to address the impact.

A finding of “New Potentially Significant Impact” means that the project may have a new potentially significant impact on the environment or a substantially more severe impact than analyzed in the previously approved or certified CEQA document that cannot be mitigated to below a level of significance or be avoided.

A finding of “Reduced Impact” means that a previously infeasible mitigation measure is now available, or a previously infeasible alternative is now available that will reduce a significant impact identified in the previously prepared environmental document.

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.

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. 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 proposed action.

c. Infeasible Mitigation Measures. Since the previous EIR was certified or previous ND or MND was adopted, discuss any mitigation measures or alternatives previously found not to be feasible that would in fact be feasible or that are considerably different from those previously analyzed and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives.

d. Changes in Circumstances. Since the previous EIR was certified or previous ND or MND was adopted, discuss any changes in the project, changes in circumstances under which the project is undertaken and/or “new information of substantial importance” that cause a change in conclusion regarding one or more effects discussed in the original document.

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.

- Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 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.
- The explanation of each issue should identify:
    - The significance criteria or threshold, if any, used to evaluate each question;
    - Differences between the proposed activity and the previously approved project described in the approved ND or MND or certified EIR; and
    - The previously approved mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
I. **AESTHETICS** – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);

- Modify Program 3, Affordable Housing Streamline, of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;

- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues, as outlined in HCD's Affirmatively Furthering Fair Housing Guidance Memo (HCD 2021); and

- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

The changes identified within the Revised HEU would not result in aesthetic changes associated with implementation of the HEU. The identified changes would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, aesthetic-related impacts are location specific and cannot be assessed in a meaningful way until the location of project sites are known and the development planned on those sites is defined. Under the Revised HEU, impacts would remain less than significant related to scenic vistas, degradation of visual character, and light and glare; no impacts would occur relative to state scenic highways. For these reasons, the Revised HEU would not result in any new or different aesthetic-related environmental impacts when compared to the Originally Adopted HEU.

3.2 Agriculture and Forestry Resources

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
II. AGRICULTURE AND FORESTRY RESOURCES – 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:				
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?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
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))?	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6 to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As there are no agriculture or forestry resources in the City, the changes identified within the Revised HEU would have no impacts related to conversion of Farmland to non-agricultural use, existing zoning for agricultural use (or a

Williamson Act contract), existing zoning for forestland or timberland, the loss or conversion of forest or timberland to non-forest use, or other changes in the existing environment which would result in conversion or farmland to non-agricultural use or forestland to non-forest use. As the proposed changes are not related to agriculture and forestry resources, and as these resources are not present in the City, the Revised HEU would not result in any new or different agriculture or forestry-related environmental impacts when compared to the Originally Adopted HEU.

3.3 Air Quality

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
III. AIR QUALITY – 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);

- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which does not constitute a substantial change. The changes identified within the Revised HEU would not result in changes to the total number of RHNA units (i.e., 774) associated with implementation of the HEU. As such, there would be no substantial changes to the previously identified and evaluated air quality impacts associated with HEU implementation. The identified changes in the Revised HEU would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to conflicts with the applicable air quality plan, a net increase in criteria pollutants, and exposure of sensitive receptors to pollutants; no impacts would occur related to other emissions, such as those leading to odors. For these reasons, the Revised HEU would not result in any new or substantially different air-quality-related environmental impacts when compared to the Originally Adopted HEU.

3.4 Biological Resources

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase compared to the Originally Adopted HEU, which is not a substantial change. The changes identified within the Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is currently paved and built-out with hotel uses and does not support any sensitive habitat, wetlands, or other undisturbed habitat likely to support special status plant or wildlife species. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on previously disturbed infill parcels, which would help avoid potential impacts to biological resources, and would continue to be subject to existing local, state, and federal regulatory requirements.

The changes proposed by the Revised HEU would not result in biological resource changes associated with implementation of the HEU. The Revised HEU changes would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units, and adoption would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to candidate, sensitive, or special status species, riparian habitat or other sensitive natural community, movement of native wildlife species, wildlife corridors, or policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; no impacts would occur related to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, or state or federally protected wetlands. For these reasons, the Revised HEU would not result in any new or different biological resource-related environmental impacts when compared to the Originally Adopted HEU.

3.5 Cultural Resources

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);

- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;

- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);

- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;

- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and

- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase compared to the Originally Adopted HEU, which is not a substantial change. The rezoning necessary to accommodate these units would still take place under a future, separate action. The Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is previously disturbed and currently built-out with hotel uses. This site does not support any known historic resources or undisturbed terrain where an inadvertent archeological find or uncovering human remains would be likely to occur. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on previously disturbed and/or graded infill parcels, which would help avoid potential impacts to cultural resources, and would continue to be subject to existing local, state, and federal regulatory requirements. Streamlining for multifamily and/or affordable housing is currently permitted in the City, pursuant to state law and the previous (i.e., 2013-2021 or "5th Cycle") Housing Element (City of Manhattan Beach 2014). Implementation of the Revised HEU would not constitute a substantial change in streamlining policy as compared to existing conditions, or to proposed conditions analyzed under the Originally Adopted HEU.

The changes identified within the Revised HEU would not result in changes to cultural resources or cultural resource impacts associated with implementation of the HEU. The identified changes would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA and lower-income buffer units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to historic resources, archeological resources, and human remains. For these reasons, the Revised HEU would not result in any new or different cultural resource-related environmental impacts when compared to the Originally Adopted HEU.

3.6 Energy

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase compared to the Originally Adopted HEU, which is not a substantial change. The changes identified above would not result in changes to the number of

RHNA units (i.e., 774) associated with implementation of the HEU. As such, there would be no changes to the previously identified and evaluated energy impacts associated with HEU implementation. The identified changes in the Revised HEU would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to wasteful, inefficient, or unnecessary consumption of energy resources or a conflict with a state or local plan for renewable energy or energy efficiency. For these reasons, the Revised HEU would not result in any new or different energy-related environmental impacts when compared to the Originally Adopted HEU.

3.7 Geology and Soils

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
VII. GEOLOGY AND SOILS – Would the project:				
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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced 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?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase compared to the Originally Adopted HEU, which is not a substantial change. The changes identified in the Revised HEU would not change the total number of required RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is flat, previously graded, paved, and built-out with hotel uses. Any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient

information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on previously disturbed and/or graded infill parcels, which would help avoid potential impacts to geology and soils, and would continue to be subject to existing local, state, and federal regulatory requirements.

As outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units, and adoption would not, in and of itself, result in environmental impacts. The Revised HEU would not result in changes to geology and soils associated with HEU implementation. Under the Revised HEU, impacts would remain less than significant related to known earthquake faults, seismic shaking, ground failure, liquification, lateral spreading, collapse, landslides, erosion, unstable soil, or expansive soils. For these reasons, the Revised HEU would not result in any new or different geology or soils-related environmental impacts when compared to the Originally Adopted HEU.

3.8 Greenhouse Gas Emissions

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49

acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);

- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase compared to the Originally Adopted HEU, which is not a substantial change. The changes identified above would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. As such, there would be no changes to the previously identified and evaluated greenhouse gas (GHG) emission impacts associated with HEU implementation. The identified changes in the Revised HEU would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to GHG emissions, or conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. For these reasons, the Revised HEU would not result in any new or substantially different GHG-related environmental impacts when compared to the Originally Adopted HEU.

3.9 Hazards and Hazardous Materials

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and

- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase compared to the Originally Adopted HEU, which is not a substantial change. The Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is currently built-out with hotel uses. Any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on previously disturbed and/or graded infill parcels, which would help avoid potential impacts related to hazards and hazardous materials, and would continue to be subject to existing local, state, and federal regulatory requirements.

The changes proposed by the Revised HEU would not result in hazards or hazardous material changes associated with implementation of the HEU. The Revised HEU changes would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units, and adoption would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to the routine transport, use, or disposal of hazardous materials; reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and emissions or handling of hazardous materials near an existing or proposed school; significant hazards to the public or environment due to location on a hazardous materials site. There would continue to be no impact related to safety hazards or excessive noise near an airport, an adopted emergency response or evacuation plan, and wildland fires. For these reasons, the Revised HEU would not result in any new or different hazards and hazardous materials-related environmental impacts when compared to the Originally Adopted HEU.

3.10 Hydrology and Water Quality

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
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:			☒	
v) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
vi) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
vii) 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	☐	☐	☒	☐
viii) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;

- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and

- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change. The Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is almost entirely paved and built-out with hotel uses. Any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on previously disturbed infill parcels, which would help avoid potential impacts related to hydrology and water quality, and would continue to be subject to existing local, state, and federal regulatory requirements.

The changes proposed by the Revised HEU would not result in hydrology and water quality changes associated with implementation of the HEU. The Revised HEU changes would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units, and adoption would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to surface or groundwater quality, sustainable groundwater management, alteration of existing drainage patterns, release of pollution due to inundation; or potential conflicts with a water quality control plan or sustainable groundwater management plan. For these reasons, the Revised HEU would not result in any new or substantially different hydrology or water-quality-related environmental impacts when compared to the Originally Adopted HEU.

3.11 Land Use and Planning

Revised HEU Impact Determination Table

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

The changes proposed by the Revised HEU would not result in a new or substantially different land use and planning impacts associated with implementation of the HEU. As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change. The Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU.

Although the Revised HEU would result in additional streamlining for future multifamily projects, these projects would be located primarily on infill parcels, and would be help bring the City into compliance with state housing law and SCAG's Connect SoCal regional plan. Streamlining for multifamily and/or affordable housing is currently permitted in the City, pursuant to state law and the previous (i.e., 2013-2021 or "5th Cycle") Housing Element (City of Manhattan Beach 2014). Implementation of the Revised HEU would not constitute a substantial change in streamlining policy as compared to existing conditions, or to proposed conditions analyzed under the Originally Adopted HEU. For these reasons, the Revised HEU would not result in any new or substantially different land use and planning-related environmental impacts when compared to the Originally Adopted HEU.

3.12 Mineral Resources

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XII. MINERAL RESOURCES – 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As there are no mineral resources in the City, the changes identified within the Revised HEU would have no impacts related to the loss or availability of a known or locally important mineral resource. As the proposed changes are not related to mineral resources, and as these resources are not present in the City, the Revised HEU would not result

in any new or different mineral resource-related environmental impacts when compared to the Originally Adopted HEU.

3.13 Noise

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XIII. NOISE – 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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;

- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

The changes identified within the Revised HEU would not result in changes to noise impacts associated with implementation of the HEU. While the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is in an urban location and is currently built-out with hotel uses, which currently generates noise from sources such as cars and HVAC equipment. Further, any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. The identified changes would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units, and adoption would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to ambient noise levels or groundborne vibration or groundborne noise levels. There would continue to be no impact related to excessive noise in the vicinity of an airport or airport land use plan. For these reasons, the Revised HEU would not result in any new or substantially different noise-related environmental impacts when compared to the Originally Adopted HEU.

3.14 Population and Housing

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XIV. POPULATION AND HOUSING – Would the project:				
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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);

- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;

- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);

- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;

- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and

- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change and would not result in substantial unplanned growth. The changes identified within the Revised HEU would not result in changes to the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site, any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU would result in additional streamlining for future multifamily projects, these projects would be located primarily on underutilized infill parcels, which would not displace substantial numbers of existing people or housing. Streamlining for multifamily and/or affordable housing is currently permitted in the City, pursuant to state law and the previous (i.e., 2013-2021 or "5th Cycle") Housing Element (City of Manhattan Beach 2014). Implementation of the Revised HEU would not constitute a substantial change in streamlining policy as compared to existing conditions, or to proposed conditions analyzed under the Originally Adopted HEU. As such, there would be no substantial changes to the previously identified and evaluated population and housing impacts associated with HEU implementation.

The identified changes in the Revised HEU would modify text of the HEU document, and, as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to unplanned population growth or the potential for displacement of people or housing. For these reasons, the Revised HEU would not result in any new or substantially different population and housing-related environmental impacts when compared to the Originally Adopted HEU.

3.15 Public Services

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
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?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change as compared to the project conditions analyzed in the Final IS/ND for the Originally Adopted HEU. The changes identified within the Revised HEU would not result in changes to the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is in an urban area served by existing public services. Any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU would result in additional streamlining for future multifamily projects, these projects would be located primarily on underutilized infill parcels in areas already served by existing public service institutions and facilities. Implementation of the Revised HEU would not constitute a substantial change in streamlining policy as compared to existing conditions, or to proposed conditions analyzed under the Originally Adopted HEU. As such, there would be no substantial changes to the previously identified and evaluated public services impacts associated with HEU implementation.

The identified changes in the Revised HEU would modify text of the HEU document, and, as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to fire protection, police protection, parks, schools, or other public facilities. For these reasons, the Revised HEU would not result in any new or substantially different public services-related environmental impacts when compared to the Originally Adopted HEU.

3.16 Recreation

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XVI. RECREATION				
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change as compared to the project conditions analyzed in the Final IS/ND for the Originally Adopted HEU. The changes identified within the Revised HEU would not result in changes to the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, any future zone changes affecting this parcel would require subsequent environmental review under CEQA. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU would result in additional streamlining for future multifamily projects, these changes would not constitute a substantial change in streamlining policy as compared to existing conditions, or to proposed conditions analyzed under the Originally Adopted HEU. As such, there would be no substantial changes to the previously identified and evaluated recreation impacts associated with HEU implementation.

The identified changes in the Revised HEU would modify text of the HEU document, and, as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. There would continue to be no impacts related to the construction or

expansion of recreational facilities. For these reasons, the Revised HEU would not result in any new or substantially different recreation-related environmental impacts when compared to the Originally Adopted HEU.

3.17 Transportation

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and

- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change and would not result in substantial unplanned growth. The changes identified within the Revised HEU would not result in changes to the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU would result in additional streamlining for future multifamily projects, these projects would be located primarily on underutilized infill parcels and would need to be consistent with appliable zoning. As such, there would be no substantial changes to the previously identified and evaluated transportation impacts associated with HEU implementation.

The identified changes in the Revised HEU would modify text of the HEU document, and, as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to a transit plan, program, ordinance, or policy, transportation system demands, transportation hazards, and/or emergency access. For these reasons, the Revised HEU would not result in any new or different transportation-related environmental impacts when compared to the Originally Adopted HEU.

3.18 Tribal Cultural Resources

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XVIII. TRIBAL CULTURAL RESOURCES				
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	☐	☐	☒	☐

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
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.	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change. The rezoning necessary to accommodate these units would still take place under a future, separate action. The Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units,

subject to rezoning, this site is previously disturbed and currently built-out with hotel uses. This site does not support any undisturbed terrain where an inadvertent TCR find or uncovering of burial remains would be likely to occur. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on previously disturbed infill parcels, which would help avoid potential impacts related to TCRs, and would continue to be subject to existing local, state, and federal regulatory requirements.[4]

The changes identified within the Revised HEU would modify text of the HEU document, and as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA and lower-income buffer units. Adoption of the HEU would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to historic resources and/or TCRs, including burial artifacts and human remains. For these reasons, the Revised HEU would not result in any new or substantially different TCR-related environmental impacts when compared to the Originally Adopted HEU.

3.19 Utilities and Service Systems

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

[4]. Pursuant to California Health and Safety Code Section 7050.5 and Public Resource 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.

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in units compared to the Originally Adopted HEU, which is not a substantial change. The Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units, subject to rezoning, this site is in an urban area served by utilities. Any land use changes (i.e., zone changes resulting in an increase in allowable residential density) incorporating this parcel would be subject to future environmental review, as required under CEQA, once sufficient information is made available. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on infill parcels within existing service areas and with access to existing utility connections, which would help avoid

potential impacts related to utilities and service systems, and would continue to be subject to existing local, state, and federal regulatory requirements.

The Revised HEU changes would modify text of the HEU document, and, as outlined in the Final IS/ND for the Originally Adopted HEU, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units, and adoption would not, in and of itself, result in environmental impacts. Under the Revised HEU, impacts would remain less than significant related to the relocation or construction of new or expanded stormwater drainage, electric power, natura gas, or telecommunications facilities; water supplies; wastewater treatment; and/or solid waste. For these reasons, the Revised HEU would not result in any new or substantially different utilities and service system-related environmental impacts when compared to the Originally Adopted HEU.

3.20 Wildfire

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XX. **WILDFIRE** – 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6 to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As the City is not located near any state responsibility area or within a VHFHSZ, the changes identified within the Revised HEU would have no impacts related to wildfire. Therefore, the Revised HEU would not result in any new or different wildfire-related environmental impacts when compared to the Originally Adopted HEU.

3.21 Mandatory Findings of Significance

Revised HEU Impact Determination

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☐	☐	☒	☐

	New Potentially Significant Impact	New Mitigation is Required	No New/No Impact	Reduced Impact
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.)	☐	☐	☒	☐
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Revised HEU Analysis

As detailed in Section 2.3, the Revised HEU would continue implementation of the Originally Adopted HEU, including sites identified for the adequate sites program overlay. The Revised HEU would:

- Increase the number of lower-income RHNA units accommodated through a future rezoning action from 406 to 412 (which could still be accommodated among site previously identified in the Originally Adopted HEU);
- Add one new site to the adequate sites program overlay identified in Table 15, Potential Underutilized Sites for Overlay, of Appendix E of the Originally Adopted HEU;
- Revise several sites and/or APNs identified in Table 15 and Table 16, Potential Buffer Rezone Sites for Lower-Income Units, of Appendix E of the Originally Adopted HEU, which would reduce the total capacity identified on potential underutilized sites from 1,018 units to 844 units (and total acreage from 50.49 acres to 42.75 acres) and increase the total capacity on potential buffer rezone sites from 26 to 115 (and total acreage from 3.96 to 8.47);
- Modify Program 3 of the Originally Adopted HEU to remove discretionary review requirements for multifamily projects that do *not* qualify for state density bonus law within the CL, CD, and CNE zones;
- Add a brief analysis to each of the implementation program discussions within Section 6, Program Implementation, to identify and evaluate "contributing factors" to fair housing issues; and
- Incorporate other administrative changes to fix minor grammatical errors, maintain internal consistency, and provided improved clarity for readers.

As identified above, the six additional lower-income RHNA units in the Revised HEU required to be accommodated through a future rezoning action represent an approximately 1.5% increase in proposed units compared to the Originally Adopted HEU, which is not a substantial change. The changes identified within the Revised HEU would not change the total number of RHNA units (i.e., 774) associated with implementation of the HEU. Further, while

the Revised HEU identifies one additional site (i.e., 1700 North Sepulveda Boulevard) as having the potential to accommodate future lower-income RHNA units (subject to rezoning), any future zone changes affecting this parcel would be subject to subsequent environmental review under CEQA. All sites identified in Table 16 of the Revised HEU were previously identified in the Originally Adopted HEU. Although the Revised HEU could result in additional streamlining for future multifamily projects, these projects would be located primarily on previously disturbed infill parcels, which would help avoid potential impacts to topics such as aesthetics, air quality, biological resources, cultural resources, hazards and hazardous materials, noise, public services, TCRs or transportation. Streamlined projects would also continue to be subject to existing local, state, and federal regulatory requirements.

As with the Originally Adopted HEU, the Revised 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, and impacts would remain less than significant. As discussed in Sections 3.1 through 3.20 of this Addendum, impacts associated with the adoption of the Revised HEU would remain less than significant or would continue to have no impact. The Revised HEU 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. For these reasons, the Revised HEU would not result in any new or substantially different environmental impacts when compared to the Originally Adopted HEU.

The Revised HEU changes would modify text of the HEU document, and as discussed throughout this Addendum, the HEU is a policy document identifying how the City will go about providing adequate capacity for the future provision of RHNA units, and adoption would not, in itself, result in environmental impacts. Compliance with applicable land use and environmental regulations would ensure that environmental effects associated with the accommodation of future housing development under the Revised HEU would not combine with effects from reasonably foreseeable future development in the City to cause cumulatively considerable significant impacts. Thus, cumulative impacts under the Revised HEU would remain less than significant. For these reasons, the Revised HEU would not result in any new or different cumulative environmental impacts when compared to the Originally Adopted HEU.

4 References and Preparers

4.1 References Cited

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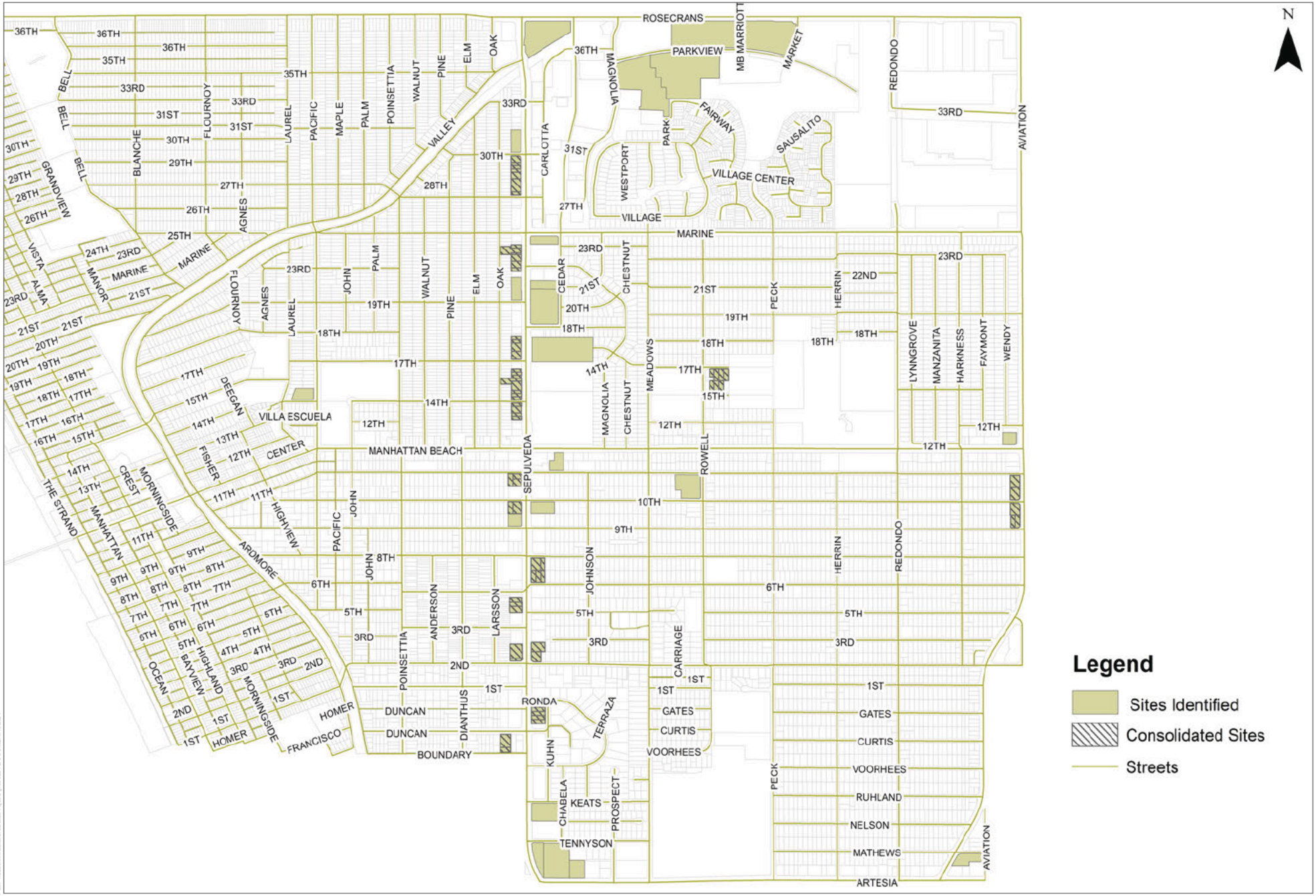
4.2 List of Preparers

City of Manhattan Beach

Talyn Mirzakhanian, Planning Manager

Dudek

Nicole Cobleigh, Senior Project Manager
Samantha Robinson, Environmental Planner



SOURCE: City of Manhattan Beach

FIGURE 1

Potential Sites to Accommodate Lower-Income Shortfall and Buffer

Addendum to the Manhattan Beach Housing Element Update IS/ND

DUDEK

Appendix A

HCD Review Letter (June 3, 2022)

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
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www.hcd.ca.gov

June 03, 2022

Bruce Moe, City Manager
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, CA, 90266

Dear Bruce Moe:

RE: City of Manhattan Beach's 6th Cycle (2021-2029) Adopted Housing Element

Thank you for submitting the City of Manhattan Beach's (City) housing element adopted March 22, 2022 and received for review on April 4, 2022. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Californians for Homeownership and Matthew Gelfand pursuant to Government Code section 65585, subdivision (c).

The adopted housing element addresses some statutory requirements described in HCD's December 14, 2021 review; however, additional revisions are necessary to fully comply with State Housing Element Law (Article 10.6 of the Gov. Code), see enclosed Appendix.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), as the City failed to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), Program 2 (Adequate Sites) to rezone 406 units to accommodate the regional housing needs allocation (RHNA) must 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).

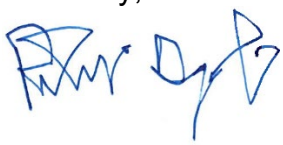
Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. During the housing element revision process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested

notices relating to the local government's housing element at least seven days before submitting to HCD.

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.

HCD appreciates the effort that the housing element team, provided throughout the course of the housing element 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 Tristan Lanza, of our staff, at Tristan.Lanza@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: While the element was revised to add trends, it must analyze patterns related to race across census tracts within the City. In addition, the element must analyze the census tract with a much lower income than the rest of the City including any local knowledge or contributing factors leading to fair housing issues. Lastly, the element must analyze the familial status and contributing factors leading to the one census tract where 40-60 percent of residents live alone compared to less than 20 percent for the rest of the City.

   Disproportionate Housing Needs including Displacement: While the element was revised to include an analysis of cost-burden and persons experiencing homelessness, the element must still address overcrowding and displacement. The element must include a regional analysis for overcrowded households (comparing the City to the region). In addition, the analysis must address patterns and trends for displacement including displacement due to investment, disinvestment, and disaster driven displacement.

   Local Data and Knowledge and Other Relevant Factors: While the element provided local data on homeownership loans and "mansionization", it should address the local voter initiative that limits multifamily developments. For example, the element could include a program that identifies potential remedies and modify and remove the constraint.

   Goals, Priorities, Metrics, and Milestones: While the element highlighted programs that correspond to the contributing factors, goals and actions must create meaningful impact to overcome contributing factors to address fair housing issues. The element must be revised to add or modify goals and actions. Goals and actions 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. *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).)*

   Sites Inventory: While the element clarified compliance with the Surplus Lands Act in Program 30 and described the City owned sites in the inventory, the element must describe how and when the City will support development of City owned lands within the planning period in the sites identified for rezoning, including the Manhattan Country Club site which pursuant to third party correspondence, was recently sold to a national operator and maintains operation. In addition, the electronic sites inventory submitted with the housing element identified a much higher number of units for rezoning than what were included in the analysis section. The element and electronic sites inventory must be revised to include the same assumptions and programs should be added or modified as appropriate based on the outcomes of a complete analysis.

   Realistic Capacity: While the element was revised to include two examples of residential development in commercial zones, it must provide additional support to address the likelihood of residential development in zones allowing 100 percent non-residential uses. For example, the element could indicate the number of applications received for 100 percent commercial development in comparison with applications for projects with a housing component in these areas.

   Small Sites: The element was revised to include one example of a proposed project that has a total of 14 units with one affordable unit within the City and generally states that small sites have been developed in nearby cities to support feasibility assumptions of small site development. However, the element must provide specific examples of nearby cities with similar characteristics (e.g., sites with 0.06 acres) and affordability levels. To support the consolidation of parcels, especially for lower income, the element should provide information on the example projects such as the number of parcels consolidated, size of parcels before and after consolidation and affordability levels and relate them to the sites in the inventory (such as similar number of parcels consolidated into one site at similar affordability levels).

   Suitability of Nonvacant Sites: While the element was revised to describe the methodology used to determine the additional development potential within the planning period for lower-income sites with existing zoning, it must include a similar analysis for candidate sites for rezoning. The element also states that building age is considered in identifying sites because it is correlated to housing conditions, but to further support the redevelopment potential of the sites identified, the element should also include

information on structural conditions or other site specific factors such as whether the use is operating or marginal instead of solely relying on age for this factor. In addition, it is assumed that chosen sites will be consolidated due to trends, but there were only two pipeline projects used to identify trends and the projects do not have similar conditions to the sites identified (i.e. number of parcels being consolidated and similar affordability assumptions). Furthermore, the element states that there is owner and developer interest in the area of the Masonic Center but it should clarify whether there is owner and developer interest on the identified site or other nearby parcels. In addition, as stated above, the element must include additional information on the redevelopment potential of the Manhattan Country Club within the planning period.

While the element analyzes feasibility of nonvacant sites identified for lower income, the element must also analyze feasibility of development of nonvacant sites identified for moderate and above moderate sites, and the candidate rezone sites. The element must also commit to rezoning the sites identified to meet the lower-income RHNA shortfall and describe the feasibility of the sites (e.g., feasibility based on use or any expressed interest in redevelopment). Lastly, the element must describe the feasibility of sites identified as surplus, including feasibility of removing existing residential uses.

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 including identified rezone sites. (Gov. Code, § 65583.2, subd. (g)(2).) The subsequent adopted element must also include findings (e.g., adoption resolution) based on substantial evidence, or 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): While the element was updated to reference Programs 1 and 19, it must still include supporting analysis for potential ADU production at levels higher than previous trends.

3. *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: While the element was revised to address some of the findings in the prior review, the analysis should address the height limit of 30 feet for all zones. The element should also 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. While the element states that the City does not feel that local voter initiative constrains affordable housing through density bonus, it should discuss the initiative as a constraint on all housing, including affordable housing not utilizing density bonus particularly as the City does identify a site in the RH zone covered by the voter initiative to accommodate a portion of the RHNA for lower-income.

Fees and Exaction: While this section was revised, there are fees listed in Appendix A that are not included in the analysis of fees in Table 9. The element must clarify how the table showing combination permit fees for multifamily interacts with the data provided in Table 9. In addition, the analysis should describe the $20,000 neighborhood overlay district application. Lastly, Appendix A identifies fees specifically for emergency shelters and reasonable accommodation application; a program must be added to remove both fees as they act as a constraint to the provision of housing for persons experiencing homelessness and persons with disabilities.

Local Coastal Program: While the element was revised to analyze constraint in permitting timeframes for single-family development, it must also analyze multifamily development. In addition, it must clarify whether coastal commission approval will be required for the one site identified for lower-income housing in the coastal zone.

Design Review: While this section was revised, the element must describe who approves the projects in the design overlay districts and describe the approval process.

Constraints on Housing for Persons with Disabilities: The element discusses licensed residential care facilities for both six or fewer or seven or more. The element must also describe how non-licensed facilities are allowed. For your information, zoning should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations such as the number of persons, population types and licenses. These housing types should not be excluded from residential zones, most notably low-density zones, which can constrain the availability of housing choices for persons with disabilities. Requiring these housing types to obtain a special use or conditional use permit (CUP) could potentially subject housing for persons with disabilities to higher discretionary standards where an applicant must demonstrate compatibility with the neighborhood, unlike other residential uses. Program 28 (Specialized Housing Types to Assist Persons with Special Needs) should describe in what zones will the facilities be allowed and clarify that they will be allowed in the same zones that allow residential care facilities for six or fewer persons.

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... (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, programs to be revised include but are not limited to, the following:

- *Program 3 (Affordable Housing Streamlining)*: While the program was revised to remove discretionary requirements in the precise development plan for projects with six or more units that qualify for state density bonus law, the element must also remove the discretionary requirements for multifamily projects that do not qualify for state density bonus law.

- *Program 28 (Specialized Housing Types to Assist Persons with Special Needs)*: The program must include specific timing for the action related to revising the zoning code relative to residential care facilities.

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... (*Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding A2, 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 19 (No Net Loss)*: While the element commits to revising ADU assumptions, the development and affordability assumptions should be monitored and modified if needed more than once in the planning period (e.g., every two years).

   - *Program 16 (Lot Consolidation Incentive)*: The program should be revised to state how often affordable housing providers will be noticed and whether proactive outreach will occur annually.

3. *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 A3, the element requires a complete analysis of potential 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 22 (Parking)*: While Program 22 was revised to include other uses in addition to religious institutions, the program only commits to studying parking outside the coastal zone. The program should also address parking standards within the coastal zone. The program should also include a commitment to reduce parking standards that require two spaces per multifamily unit regardless of bedroom size.

- *Program 18 (Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CND) Commercial Districts)*: While the timeframe was revised, the program must remove the CUP for all multifamily developments in the identified zones, not just projects that meet the requirements for a density bonus.

4. *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... (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.

CITY OF MANHATTAN BEACH

6TH CYCLE
HOUSING ELEMENT
(2021-2029)

ADOPTED MARCH 2022



DUDEK

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Revisions Incorporated August 2022

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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.[1] 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

[1] 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; and provides an overview of the identification and prioritization of contributing factors, goals policies, and actions under the fair housing requirements of AB 686.
- 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.

5.1 Identification and Prioritization of Contributing Factors, and Goals, Policies, and Actions (AB 686)

Existing Housing Element Law requires various analyses, such as a housing needs assessment, housing needs of persons with special needs, housing conditions, potential governmental and non-governmental constraints, and site inventory to accommodate the projected housing need (i.e., regional housing need allocation). Each of these analyses inform the goals, policies and schedule of actions to address the existing and projected housing needs over the planning period. Assembly Bill (AB) 686 (2018) advances this same framework and requires linking analysis with policy and action formulation. AB 686 requires an identification and prioritization of contributing factors to fair housing issues.

The housing element must include an identification and prioritization of significant contributing factors to:

- Fair Housing Enforcement and Outreach Capacity
- Segregation and Integration; Racially and Ethnically Concentrated Areas of Poverty
- Disparities In Access To Opportunity
- Disparities in Access to Opportunity for Persons with Disabilities
- Disproportionate Housing Needs, Including Displacement Risks

Examples of contributing factors by fair housing area are provided in the California Department of Housing and Community Development's (HCD) Affirmatively Furthering Fair Housing handbook and were used to form the analysis included in this Housing Element.

Additionally, Housing Element Law requires programs with a schedule of actions with timelines and specific commitment to have a "beneficial impact" within the planning period to achieve the goals and objectives of the housing element. AB 686 builds upon these program requirements, including modifying the existing program requirement to promote fair housing opportunities to

now include actions that promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons. As part of this requirement, the housing element now requires an identification of priorities and goals based on identified contributing factors that limit or deny fair housing choice or access to opportunity, or that negatively impact fair housing or civil rights compliance. Similar to the existing Housing Element Law, AB 686 also requires identification of metrics or quantified objectives and milestones for determining what fair housing results will be achieved. Strategies and actions to implement priorities and goals may include, but are not limited to:

- Enhancing mobility strategies and promoting inclusion for protected classes
- Encouraging development of new affordable housing in high-resource areas
- Implementing place-based strategies to encourage community revitalization, including preservation of existing affordable housing
- Protecting existing residents from displacement

As part of this requirement, relevant programs in the Housing Element have been identified using the handbook criteria and guidance provided by HCD and are included in the tables following each program's objectives, timeframes, responsible agency and funding sources.

The identification and evaluation of contributing factors appears as following:

- Fair Housing Issues: Identifies fair housing issues and significant contributing factors.
- Contributing Factor(s): Prioritizes contributing factors, including any local information and knowledge.
- Program/Action Type: Discusses strategic approaches to inform and strongly connect to goals and actions.

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.

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. Beyond those requirements under State law, the City offers more flexibility by permitting two ADUs on a lot with a proposed or existing single-family dwelling.[2]
- Consistent with State law, the City permits ADUs for existing multifamily dwelling units, Beyond those requirements under State law, the City permits one ADU on a lot with a newly constructed multifamily development.[3]

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 (Section 5.4), 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 that the City adopted in January 2021. As fully

[2] 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).

[3] 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).

explained in Appendix E, the City permitted 3 ADUs in 2020, 15 ADUs in 2021, 18 ADUs to date in 2022 (January 2022 -July 2022), and an additional four ADU permit applications received in July 2022 are currently under City review. Not accounting for the applications under review or the second half of 2022, an average of 12 ADUs were permitted per year over the last 3 years (2020-2022). Based on the local incentives, ADU and JADU trends since January 2018, recent sharp upward trends in 2021 following adoption of the local ordinance, 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.

Objectives	• 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. • Amend the ADU Ordinance if needed to conform to future amendments to State law and submit to HCD. Process LCP Amendments as required.

	• Incentivize affordable ADUs: 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. • Based on the results of the planning cycle mid-point review of ADU trends, including affordability, to be completed as part of Program 19, No Net Loss, 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. • Issue building permits for an average of 10 ADUs annually.
Timeframe	• 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. • Annual monitoring of ADU programs. • Develop public engagement and informational tools for ADU/JADUs incentive program by January 2024. • Based on the planning cycle mid-point review to be completed by November 2025 as part of Program 19, No Net Loss, adopt additional incentives to encourage ADU/JADU development by June 2026. • Ongoing tracking of ADU permits issued throughout the planning period and reported annually.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.1, 2.2, 2.3, 4.1
Relevant Programs	Program 19: No Net Loss
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	The availability of affordable units in a range of sizes
Program/Action Type	New Housing Choices and Affordability in Areas of Opportunity • Incentivize ADUs affordable to lower- and moderate-income households throughout the community.

	• Increase ADU production by an average of five times compared to the yearly average[1] in the previous planning period and issue building permits for an average of 10 ADUs annually.
1. Average is based on 2017-2020 ADU permits issued as fully discussed in Appendix E, Section 5.4, Accessory Dwelling Unit Projections.	

Program 2: Adequate Sites

As fully analyzed in Appendix E, Sites Analysis and Inventory, the City has a remaining lower-income RHNA of 412 units for the 6th Cycle planning period. The City will establish an overlay district that encompasses a minimum of 20.6 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 412 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 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)[4] 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 permit a minimum density of 20 dwelling units per acre, consistent with State law, and 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.

4. 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.

In addition, the City commits to establishing 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 selected from the sites identified in Table 15 of Appendix E. 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).

Objective	• Establish overlay district adhering to the standards set forth in Government Code sections 65583.2 (h) and (i) to address shortfall and create opportunity for at least 412 units of multifamily housing for lower-income households with priority for all rezones in areas with access to amenities such as recreation, services, education, and other needs. • Establish additional capacity in the overlay district 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.
Timeframe	• Pursuant to the requirements as set forth in AB 1398 (2021), the City will rezone by February 2025[5] to accommodate the lower-income shortfall of 412 units. • Rezone by February 2025 to accommodate the lower-income buffer of 73 units.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.1, 2.2, 2.3, 4.1
Fair Housing Issue	Disparities in Access to Opportunity for Persons with/ or without Disabilities
Contributing Factor(s)	Land use and zoning laws; Lack of zoned capacity for multifamily housing
Program/Action Type	Housing Mobility Strategies; New Housing Choices and Affordability in Areas of Opportunity • Create opportunity for at least 412 units of multifamily housing for lower-income household through adoption of new overlay. • As 100% of sites identified to address the lower-income shortfall and the additional buffer are in Highest Resources[1]

[5] 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.

	areas, the rezone efforts will create the opportunity for at least 487 affordable, multifamily housing units on at least 24.25 acres of sites with access to amenities such as recreation, services, education, and other needs.
1. 2022 TCAC/HCD Opportunity Map	

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, including, but not limited to housing for lower-income, very low-income, and moderate-income households, and units for older adults, 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).

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.[6] 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.

[6] 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).

Objectives	• Continue to offer concurrent processing of all discretionary applications for a project. • Amend Zoning Code to ensure a non-discretionary approval process for Precise Development Plan applications. • Process proposals for SB 35 permit streamlining consistent with State law. • Develop internal staff procedures to assist staff in responding to SB 35 proposals and permit streamlining.
Timeframe	• Ongoing concurrent processing of all discretionary applications for a project throughout the Housing Element planning period. • Amend the Zoning Code to ensure a non-discretionary approval process for Precise Development Plan applications and related LCP Amendments by August 2023. • Ongoing SB 35 processing throughout the Housing Element planning period and report annually. • Develop staff assistance materials by January 2023.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.2, 2.3, 2.4, 4.2
Relevant Programs	Program 11: Density Bonus Program 18: Multifamily Residential Development Standards and Streamlining in the Mixed-Use (CL, CD, and CNE) Commercial Districts
Fair Housing Issue	Disparities in Access to Opportunity for Persons with/ or without Disabilities
Contributing Factor(s)	Regulatory barriers to providing affordable, accessible housing in range of unit sizes.
Program/Action Type	New Housing Choices and Affordability in Areas of Opportunity • Ensure a 100% objective approval process for Precise Development Applications to incentivize housing development for, but not limited to lower-income, very low-income, and moderate-income households, and housing for older adults. • Streamlined approval for residential multifamily projects with six or more units that qualify for a density bonus to increase housing choices, and opportunities for development community wide.

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.

Objectives	• Increase coordination with affordable project owners by contacting and meeting with property owners of project. • Monitor affordability throughout the planning period as a proactive measure to preserve 100% of affordable units in the Manhattan Village Senior Villas development and preserve units for older adults and adults with disabilities. • Create and maintain list of non-profit organizations as potential purchasers/managers of affordable housing units.
Timeframe	• Contact and meet with property owners of project by January 2023 and again mid-cycle by January 2026. • Monitor affordability throughout the planning period. • Biannually update list of non-profit and affordable housing developers starting January 2023.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.3, 1.4, 2.3, 4.1
Fair Housing Issue	Disparities in Access to Opportunity for Persons with/ or without Disabilities
Contributing Factor(s)	Access to publicly supported housing for persons with disabilities
Program/Action Type	Place-based Strategies to Encourage Community Conservation and Revitalization

	• Increased local coordination to increase the preservation of existing affordable housing units. • Monitor affordability throughout the planning period as a proactive measure to preserve 100% of affordable units and preserve units for older adults and adults with disabilities.

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, connecting the Senior Villas, Village Field, and the City Public Park through an ADA compliant pathway. 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 CDBG funds for the Annual ADA Improvements Program 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.

Objectives	• Complete ADA-compliant infrastructure improvements as part of the Manhattan Senior Villas ADA Pathway Project. (See objective related to Manhattan Village Senior Villas preservation efforts in Program 4). • Construct ADA-compliant concrete access ramps at various locations throughout targeted areas of the City.
Timeframe	• Complete Manhattan Senior Villas ADA Pathway Project infrastructure improvements by January 2023.

	• Annual allocation of CDBG funding to ADA-compliant improvements during the planning period, as part of the Annual ADA Improvements Program.
Responsible Agencies	• Public Works Department • Community Development Department
Funding Sources	CDBG Funds
Relevant Policies	2.3, 3.1, 4.1, 4.3
Fair Housing Issue	Disparities in Access to Opportunity for Persons with Disabilities
Contributing Factor(s)	Inaccessible sidewalks, pedestrian crossings, or other infrastructure
Program/Action Type	Housing Mobility Strategies; Place-based Strategies to Encourage Community Conservation and Revitalization • Accessibility program focused on improving access to sidewalks, signage, and pedestrian crossings for older adults and residents with disabilities. • Dedicated funding to targeted infrastructure improvements that proactively enhance accessibility through allocation of CDBG funds.

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).

Objectives	• Report to HCD annually on progress made toward the Housing Element. • Report to the City Council annually on Housing Element progress.
Timeframe	Annually reporting throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	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, two nonvacant parcels (Assessor's Parcel Number 4170-026-003 and 4170-026-004 in Lower-Income Site 1) identified in the Sites Inventory to accommodate the lower-income RHNA were identified in a prior housing element.[7] As such, Site 1, 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.

Objective	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.
Timeframe	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).
Responsible Agency	Community Development Department
Funding Sources	Community Development Department Budget
Relevant Policies	1.2, 2.1, 2.2, 2.4

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

[7] 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.

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.

Objectives	• Continue requiring a Report of Residential Building Records. • 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. • Continue referrals to the County of Los Angeles Environmental Health Division to facilitate approximately 55 inspections throughout the planning period. • 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.
Timeframe	• Ongoing; annually throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.3, 1.4, 3.1, 3.2, 3.3, 4.1, 4.3
Fair Housing Issue	Disproportionate Housing Needs, Including Displacement Risks; Fair Housing Enforcement
Contributing Factor(s)	Local public fair housing enforcement; Private investments in specific neighborhoods
Program/Action Type	Place-based Strategies to Encourage Community Conservation and Revitalization • Facilitate approximately 55 inspections throughout the planning period ensuring that multifamily, rental housing is safe, sanitary, and fit for human habitation. • Proactive code enforcement program through building-permit issuance basis to ensure safety of residential buildings.

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.

Objectives	Advertise HOP on the City's website and for distribution at the planning counter.
Timeframe	• Program information will be posted online and made available at the planning counter by March 2023. • 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.
Responsible Agency	LACDA: Program Funding; Community Development Department: Staff time for program advertisement and website updates.
Funding Sources	Los Angeles County HOME Allocation; City General Fund: Staff time.
Relevant Policies	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.

Objectives	• Post program information on the City's website and for distribution at the planning counter. • Increase Coordination with the LACDA with regular contact.
Timeframe	• Program information will be posted online and at the counter by March 2023. • Coordination will be ongoing throughout the planning period through biannual contact beginning June 2023.
Responsible Agency	Los Angeles County Community Development Commission; Community Development Department for program advertisement and coordination efforts.
Funding Sources	HOME funds and CDBG allocations, Tax Exempt Multi-Family Revenue Bond, and other County funding sources.
Relevant Policies	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).

Objectives	• Update Density Bonus Ordinance, consistent with State law. • 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.
Timeframe	• Amend the Density Bonus Ordinance by March 2023. • Ongoing monitoring of future amendments to State Density Bonus Law.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.1, 2.2, 2.4, 3.4, 4.2
Relevant Programs	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).

Objective	Maintain relevant development checklist of materials and other information on the City's website as detailed above and in AB 1483 (2019).
Timeframe	• Update relevant information that is applicable for housing development project proposal requirements within 30 days of any changes, consistent with AB 1483 (2019).

	• Ongoing throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	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.

Objectives	• Adopt Climate Action and Adaptation Plan and related Local Coastal Program–Land Use Plan updates. • Review green building techniques in the MBMC to ensure compliance with State requirements.
Timeframe	• Adopt Climate Action and Adaptation Plan and submit Local Coastal Program–Land Use Plan updates to California Coastal Commission by 2023. • Ongoing review of City codes to integrate energy efficient building techniques throughout the planning period.
Responsible Agencies	• Community Development Department
Funding Sources	City General Fund and California Coastal Commission LCP Grant and California Climate Investments
Relevant Policies	1.3, 3.1, 3.2, 3.3, 3.4

Fair Housing Issue	Displacement Risks
Contributing Factor(s)	Disaster-driven Displacement
Program/Action Type	Protecting Existing Residents from Displacement • Addressing negative impacts from climate change through investments in adaptation measures. • Completing a Sea Level Rise Risk, Hazards, and Vulnerability Assessment and adopting a Climate Action and Adaptation Plan to proactively assess and mitigate displacement risks.

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.

- The City commits to taking 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.

In addition, the City commits to outreach and education to help the community understand the benefits of multifamily housing and several other fair housing topics as part of the South Bay Sustainable Housing Development Education Program. This program will be funded through Regional Early Action Planning grants, which were received by the South Bay Cities Council of Governments (SBCCOG) on behalf of all member agencies, including Manhattan Beach after the City worked with SBCCOG on project development and REAP grant submittal for the project. The Program will include a series of educational workshops (Housing Education Forums) to encourage informed discussions regarding residential density and design that support a range of sustainable and affordable housing options and help decision makers, stakeholders and community members understand optimal ways to meet regional housing needs.

Housing Education Advisory Committee: A Housing Education Advisory Committee will be formed as part of the Housing Education Program. The Advisory Committee will be made up of approximately nine city leaders (e.g., elected officials, planning commissioners, community development staff, and community advocates) from South Bay cities, including Manhattan Beach. As such, the City will commit one Planning Commissioner to volunteer as a City representative on the Advisory Committee to help with anticipated tasks such as: meeting participation to discuss program development and delivery, advising on curriculum development in the Housing Education forum series, identifying questions and topics to address from a local perspective, recommending experts and guest speakers to deliver housing education trainings, reviewing and finalizing curriculum for the workshops, and promoting the Housing Education Forum, including to elected officials, commissioners, and staff. Having a City representative on the Advisory Committee ensures that content in the educational series includes perspectives relevant to the development patterns and land uses in Manhattan Beach from a fair housing lens, and that the Housing Education Forums are promoted throughout the community.

Housing Education Forums: The feedback and curriculum developed through the Advisory Committee meetings will then be used for the Housing Education Forum series. The forums will gather attendees for discussions on housing opportunities and constraints, followed by goals, priorities, and programs for successfully providing a fair and adequate range of housing options across all income categories and special needs. The educational forums will include a series of 10 online webinars and the recordings will be uploaded and made publicly available to ensure community and regional access. Speakers for the educational series will include housing experts that discuss housing topics and what communities can do to encourage housing, and the forums will cover topics such as affordable housing development, housing law, land use, gentrification, the RHNA allocation process, including population forecasts influencing RHNA allocations.

The educational outreach will play an important role in informing city leaders about residential density and design, including affordable and multifamily housing, that supports a range of fair and equal housing choices and help decision makers and community stakeholders to understand ways to meet the City's housing needs through different strategies for addressing design, density, and affordability.

Objectives	• Support and engage in the Regional Analysis of Impediments to Fair Housing. • Post fair housing information on the City's website. • Develop a handout for developers to be made aware of fair housing advertisement material compliance and make publicly available. • Implement a procedure that prompts fair housing administration for housing and community development decisions. • Commit one Planning Commissioner to volunteer as a City representative on the Housing Education Advisory Committee to ensures that content in the educational series includes perspectives relevant to the development patterns and land uses in Manhattan Beach from a fair housing lens, and that the Housing Education Forums are promoted throughout the community and to other City leaders. • Support SBCCOG in hosting 10 Housing Education Forums that support discussions regarding residential density and design that support a range of sustainable and affordable housing options and help decision makers, stakeholders and community members understand optimal ways to meet regional housing needs and affirmatively further fair housing, • Promote Housing Education resources after the forums, including series recordings, on the City website.
Timeframe	• Ongoing engagement throughout the planning period with updated Regional Analysis of Impediments to Fair Housing every 5 years. • Website information and developer handout to be posted and made available by January 2023. • Develop fair housing administration procedure by March 2023. • Commit one Planning Commissioner as a City representative on the Housing Education Advisory Committee by October 2022. • Support completion of 10 Housing Education Forums by April 2023 and post Housing Education resources on the City website within a month of the series end date.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.3. 3.1, 4.1, 4.2, 4.3

Fair Housing Issue	Fair Housing Enforcement and Outreach Capacity; Segregation and Integration
Contributing Factor(s)	Lack of regional cooperation; Lack of accessible forums; Community opposition;
Program/Action Type	Housing Mobility Strategies; New Housing Choices and Affordability in Areas of Opportunities • Encouraging inter-governmental coordination as a mechanism to overcome constraints or opposition to the development of affordable housing through City participation in the Housing Education Advisory Committee and ensure that content in the educational series includes perspectives relevant to the development patterns and land uses in Manhattan Beach from a fair housing lens, and that the Housing Education Forums are promoted to other City leaders and throughout the community. • Campaign to combat local opposition through 10 Housing Education Forums and catalyze leadership and future community wide decision-maker.

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.

Objectives	• Support the provision of five vouchers annually to facilitate rent subsidies for very low- and extremely low-income residents. • Enhance City website with information related to the Housing Choice Voucher Program.

Timeframe	• Annually throughout the planning period. • Update City website by January 2023.
Responsible Agencies	• Los Angeles County Development Authority • Community Development Department
Funding Sources	Federal Section 8 funds
Relevant Policies	1.4, 2.3, 4.1, 4.3
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	Lack of rental relief programs or units in higher resource areas
Program/Action Type	Housing Mobility Strategies • Support the provision of five vouchers annually throughout the community. • As all census tracts in the City are designated as Highest Resources[1] areas, the provisions of vouchers in the City increases access to amenities such as recreation, services, education, and other needs, for the voucher recipients.
1. 2022 TCAC/HCD Opportunity Map	

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.[8] See the

[8] See Tables 7, 8, 9, 15 and 16 in Appendix E, Sites Analysis and Inventory, for additional parcel details.

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:

- Publicize the lot consolidation program on the City's website, and to all housing developers at the Planning counter or who contact the City with any interest in development throughout the community.
- Assist affordable housing developers through technical assistance in identifying opportunities for lot consolidation using the City's GIS system and property database.
- Expedite processing for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.
- Waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments.

Through this program's incentives and actions detailed above, the City assumes they will process and approve 6 lot consolidations for qualifying multifamily developments throughout the planning period. The City will complete a mid-cycle effectiveness review to ensure that three projects that utilize the lot consolidation incentive have been approved by the planning cycle mid-point (November 2025). If the City has not reached the mid-cycle goal of three lot consolidations, the City will develop and implement a proactive outreach strategy that includes creating and maintaining a list of affordable housing providers that they will proactively contact on an annual basis to inform them of available incentives and opportunities for lot consolidation opportunities.

Objectives	• Continue to provide a consolidation bonus incentive in the form of a 5 to 10 percent base density increase for sites based on the combined parcel size as provided in Section 10.12.030 of the MBMC. • Publicize the program on the City's website, and to all housing developers at the Planning counter or who contact the City with any interest in development throughout the community. • The City will continue to provide technical assistance to housing developers by assisting affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database. If needed, the City will develop additional outreach strategies as detailed in the mid-cycle objective below.

	• Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments. • Amend Section 10.12.030 of the MBMC to provide a lot consolidation bonus incentive in the form of a 5 percent base density increase for sites between 0.30 acres to 0.49 acres identified in Exhibit A, Electronic Housing Element Site Inventory Form, of Appendix E. • Process and approve 6 lot consolidations throughout the community. • Complete a mid-cycle effectiveness review to ensure that 3 lot consolidations have been approved by the planning cycle mid-point. If the City has not reached the mid-cycle goal, the City will develop and implement a proactive outreach strategy that includes creating and maintaining a list of affordable housing providers that they will proactively contact to inform them of available incentives and opportunities for lot consolidation opportunities.
Timeframe	• Ongoing lot consolidation bonus incentive throughout planning period. • Develop promotional material to publicize program and update City's GIS system and property database by February 2024. • 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. • Ongoing expedited processing and fee waivers for lot consolidations processed concurrently with other planning entitlements throughout the planning period. • Amend Section 10.12.030 of the Zoning Code by August 2023. Process LCP Amendments as required. • Process and approve 6 lot consolidations throughout the community within the planning period. • Complete a mid-cycle effectiveness review to ensure that 3 lot consolidations have been approved by November 2025. If the City has not reached the mid-cycle goal, the City will develop and implement a proactive outreach strategy within six months of the review. Outreach will be conducted on an annual basis throughout the remainder of the planning period.

Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.1, 2.2, 2.3, 2.4, 4.2
Fair Housing Issue	Disparities in Access to Opportunity
Contributing Factor(s)	Land use and zoning laws
Program/Action Type	New Housing Choices and Affordability in Areas of Opportunity • Provide a consolidation bonus incentive in the form of a 5 to 10 percent base density increase to incentive a variety of housing types, including those with special needs, affordable housing and housing for older adults. • Process and approve 6 lot consolidations throughout the community. • Expedite processing for lot consolidations for affordable housing developments to incentivize affordable housing. • Waive fees for lot consolidations for affordable housing developments to incentivize new affordable housing.

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).

Objectives	• Amend the MBMC to ensure consistency with State law regarding manufactured homes. • Amend the MBMC to ensure consistency with State law regarding mobile home parks.
Timeframe	• Amend the MBMC and submit related LCP Amendment applications by March 2023.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	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. 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. 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. All projects that qualify for the State density bonus will be eligible for streamlined approvals through a non-discretionary approval process for Precise Development Plan applications (detailed in Program 3). Residential developments with six or more units that are not eligible to receive a density bonus shall be permitted through a Site Development Permit (review of Site Development Permits are limited to confirming that the project complies with applicable development standards and does not examine the appropriateness of the use itself. See full Site Development Permit processing and Planning Commission's objective findings detailed in Section 2.4.3 of Appendix C).

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 otherwise subject to voter approval for certain amendments to

specific residential development standards.[9] The City will ensure that the adopted standards for residential and mixed-use projects do not reduce the intensity of land use[10] 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.

Objectives	• Amend the Zoning Code to remove discretionary requirements and provide streamlined processing through a Precise Development Plan permit for multifamily housing in the CL, CD, and CNE zones for projects that qualify for a density bonus. • Amend the Zoning Code to permit multifamily developments with six or more units that are not eligible to receive a density bonus in the CL, CD, and CNE zones subject to a Site Development Permit. • Adopt development standards for multifamily residential and mixed-use projects in the CL, CD, and CNE zones.
Timeframe	• Amend the Zoning Code and related LCP Amendments by August 2023. • Streamlining availability to be ongoing throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.1, 2.2, 2.3, 2.4, 3.4, 4.2
Relevant Programs	Program 3: Affordable Housing Streamlining Program 11: Density Bonus Program 20: Objective Design Standards
Fair Housing Issue	Segregation and Integration; Disproportionate Housing Needs
Contributing Factor(s)	Community opposition; The availability of affordable units in a range of sizes
Program/Action Type	New Housing Choices and Affordability in Areas of Opportunities; Housing Mobility Strategies (Developing multifamily housing opportunities)

[9] 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.

[10] 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.

	• Remove Conditional Use Permit requirements for multifamily projects in the City's mixed-use zones to provide opportunities for new, multifamily developments across various areas of the community. • Streamlined, objective approval through a Precise Development Application for multifamily projects with six or more units that qualify for a density bonus to increase housing choices, and opportunities for, but not limited to lower-income, very low-income, and moderate-income households, and housing for older adults.

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.

Projected Versus Actual ADUs for Planning Cycle Mid-Point: June 30, 2021 – October 15, 2025

Income Level	Percent of ADUs	Projected ADUs for 6th RHNA Projection Period[1]	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

Objectives	• Amend staff procedures to ensure all development proposals and rezone proposals are reviewed against the capacity identified for sites in the Sites Inventory (**Appendix E**). • 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. • Monitor the development of ADUs per the ADU projection assumptions in the Sites Inventory (Appendix E) and collect and report data for the Housing Element Annual Progress Report. • Check annual ADU trends to date at the planning cycle mid-point (mid-point is October 15, 2025) and two years after the midpoint and identify additional lower- and moderate-income sites if the ADU production does not keep pace with the ADU production and affordability assumptions toward the RHNA (the City will also develop additional incentives as part of the objectives listed in Program 1, Accessory Dwelling Units). • 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.
Timeframe	• Amend staff procedures and develop a methodology for tracking capacity by March 2022. • 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. • Check annual ADU trends to-date by November 2025 and two years after (by November 2027). Identify additional sites by June 2026 and June 2028, respectively, if ADU production and affordability does not keep pace with the ADU assumptions toward the RHNA and there is not an appropriate buffer remaining. • Ongoing tracking of sites throughout the planning period and make additional sites available within 180 days in the event that a capacity shortfall occurs.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 1.4, 2.1, 2.2
Relevant Programs	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.

Objective	Monitor Zoning Code amendments to ensure any new design standards are objective.
Timeframe	Ongoing throughout the planning period, as new design standards are being drafted.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	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.

Objectives	• Provide services to 1,000 older adults per year through the Older Adults Program. • Provide Dial-a-Ride services to 1,000 older adults and/or residents with disabilities (all ages) per year for 55+ years old or who have disabilities (all ages) to assist them with things such as picking up medication, doctor visits, and groceries. • Coordinate Rotary Cares, a volunteer program that rehabilitates two senior homes per year, consisting of minor repairs, plumbing, carpentry, painting, and other improvements.
Timeframe	• Ongoing, annually throughout planning period.
Responsible Agencies	• Senior Services Care Manager • Fire Department • Parks and Recreation Department
Funding Sources	General Fund / Beach Cities Health District
Relevant Policies	1.3, 2.3, 3.1, 3.2, 4.1
Fair Housing Issue	Disparities in Access to Opportunity for Persons with Disabilities; Disparities in Access to Opportunity
Contributing Factor(s)	Access to transportation for persons with disabilities; access to resources and supportive services
Program/Action Type	Place-based Strategies to Encourage Community Conservation and Revitalization • Provide services to 1,000 older adults per year through the Older Adults Program to locate suitable housing, including referrals to "board and care" residential facilities or multifamily

	apartments, financial resources, health and personal services, and social services and community classes. • Dial-a-Ride services to 1,000 older adults to provide 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. • Targeted rehabilitation efforts for two older adult households per year through Rotary Cares.

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.

While parking is typically perceived as a constraint to development, 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. Understanding that parking requirement reductions in the Coastal Zone are not in the direct purview of the City, the City still takes active steps to mitigate potential constraints related to required parking. The City currently provides flexibility through the City's development standards by excluding areas in multifamily developments used exclusively for vehicle parking and loading, as well as basement areas located entirely below local grade, and 30 percent of the area of all basements of a building that are not entirely below local grade from the final determinations of a developments buildable floor area.

As additional mitigation, the City commits to proactively exploring creative parking strategies in the Coastal Zone and permitting them through objective processes that implement creative ways to mitigate potential parking impacts to the development of housing. Creative parking solutions may include mechanical stack parking, such as park lifts, parking elevators, tandem parking, and fostering cooperation with businesses, residents, and inter-

governmental coordination to address parking needs. The City will develop a menu of creative parking strategies and review existing standards as part of the parking study to be completed by June 2024. Based on the menu of strategies, the City will codify the parking strategies, including objective implementation processes, that align with the Coastal Commission's policies that aim to protect public access and parking in Coastal Zones, and mitigate potential constraints to development as they relate to parking in the Coastal Zone. The City will strategize to obtain Coastal Commission certification for associated updates to the LCP by December 2024. In addition, the City will continue to apply reduced parking ratios for affordable housing projects in the Coastal Zone per local and State density bonus law (as further described in Appendix C).

Objective	• Amend the Zoning Code to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development. • Complete a parking study for reduced parking requirements for multifamily housing and implement flexibility in parking requirements based on findings. • Create a menu of creative parking strategies, such as mechanical stack parking, such as park lifts, parking elevators, tandem parking, review existing standards, and foster cooperation with businesses, residents, and inter-governmental coordination to address parking needs in the Coastal Zone. • Based on the menu of creative parking strategies for the Coastal Zone and review of existing standards, the City will codify the creative parking strategies, including objective implementation processes, that align with the Coastal Commission's policies that aim to protect public access and parking in Coastal Zones and mitigate potential constraints to development. Strategize to obtain Coastal Commission certification for associated updates to the LCP. • Allow for reduced parking ratios for affordable housing projects in the Coastal Zone in accordance with local and State density bonus law.
Timeframe	• Amend the Zoning Code to comply with religious institution–affiliated housing development projects by March 2023. Process LCP Amendments as required. • Complete parking study by June 2024. Based on findings, amend the Zoning Code by January 2025. • Create a menu of creative parking strategies and review existing standards in Coastal Zone by June 2024,

	• Based on the menu of creative parking strategies for the Coastal Zone and review of existing standards, the City will codify the creative parking strategies within a year including objective implementation processes, that align with the Coastal Commission's policies that aim to protect public access and parking in Coastal Zones and mitigate potential constraints to development and strategize to obtain Coastal Commission certification for associated updates to the LCP by December 2024. • Allow for reduced parking ratios for affordable housing projects in the Coastal Zone in accordance with local and State density bonus law throughout planning period.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	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).

Objectives	• 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. • 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.
Timeframe	• Ongoing implementation of Sections 10.12.030 and 11.32.090 of the MBMC throughout the planning period. • Amend the Zoning Code by January 2024.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 1.2, 1.3, 1.4, 2.1
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	Land use and zoning laws
Program/Action Type	Place-based Strategies to Encourage Community Conservation and Revitalization • Prevent reductions in the City's overall housing stock and preserve opportunities for multifamily developments through targeted Zoning Code amendments to prevent consolidation of lots for the purpose of developing large, single dwelling units.

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.

Objectives	• Internally distribute adopted Housing Element to Public Works Department. • Increased coordination with the Public Works Department to ensure that adopted policies prioritize water and sewer allocation for affordable housing development.
Timeframe	• Internally distribute adopted Housing Element upon local adoption of the 6th Cycle Housing Element by March 2023. • Ongoing coordination throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	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 not require a fee for reasonable accommodation applications and will remove any fees related to reasonable accommodation applications during the community development departments next fee study and corresponding fee schedule update, and develop materials and outreach methods to increase public awareness and ease of access to policies, programs, and processes addressing reasonable accommodation.

Objectives	• 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. • Develop outreach and dissemination programs and materials for the public and City staff. • Accept reasonable accommodation applications without required fees in accordance with fair housing laws. • Complete fee study and remove reasonable accommodation application fees from fee schedule.
Timeframe	• Amend the MBMC by March 2023. • Develop outreach and dissemination materials by January 2024. • Accept reasonable accommodation applications without required fees in accordance with fair housing laws throughout planning period. • Complete fee study and corresponding fee schedule updates to remove fees for reasonable accommodation applications by January 2025.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 2.4, 3.1, 4.1, 4.2, 4.3
Fair Housing Issue	Fair Housing Enforcement and Outreach Capacity
Contributing Factor(s)	Lack of accessible forums (e.g., reasonable accommodation procedures)
Program/Action Type	New Housing Choices and Affordability in Areas of Opportunity • Accessibility modification programs and other measures that proactively enhance accessibility, including removing fees for applications.

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.

Objectives	• Amend staff procedures related to the review and issuance of demolition and development permits. • Enforce replacement requirements in accordance with Government Code Section 66300, and the requirements as set forth in Government Code Section 65915, subdivision (c)(3).
Timeframe	• Amend staff procedures by January 2023. • Continue ongoing replacement requirements throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	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.

Objectives	• Promote and incentivize alternate energy through permit subsidies for approximately 90 solar permits per year. • Continue to track number of solar permits.
Timeframe	• Ongoing annually throughout the planning period. • Annual monitoring to track permits.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	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), and remove current emergency shelter application fees related to reviewing emergency shelters requests in the PS and IP zones.

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 six or fewer persons, referred to as Residential Care, Limited in the MBMC, are a permitted use in all residential zones (RS, RM, RH, RPD, and RSC) in conformance with State law. 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. As of August 2022, a residential care (general, serving seven or more) facility is currently in plan check. The assisted living project for older adults will consist 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 and people with disabilities in the City during the planning period.

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 amend the Zoning Code to allow residential care facilities serving seven or more in the RS and RM zones, and mitigate any constraints that may be posed by a Use Permit by ensuring an objective approval process, that is 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, regardless of licensing. 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.

Objectives	• 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. • 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. • Amend the MBMC to permit supportive housing in accordance with State law. • Amend the parking requirements for emergency shelters to ensure consistency with State law. • Amend the MBMC to permit Residential Care, General (serving seven or more persons) facilities in the RS and RM zones. • Amend the MBMC to include findings specific to Use Permits for Residential Care, General (serving seven or more persons) facilities, regardless of licensing, that are objective and improve certainty in the development approval process. • Complete fee study and remove emergency shelter application fees from fee schedule.
Timeframe	• Annual monitoring of State laws regarding special needs housing, throughout the planning period. • Adopt policies and procedures for processing supportive housing and Low-Barrier Navigation Centers by January 2023. • All Zoning Code amendments as identified in the objectives (including as they relate to supportive housing, emergency shelters, and residential care facilities) to the MBMC by March 2023. • Complete fee study and corresponding fee schedule updates to remove fees for emergency shelter applications by January 2025.
Responsible Agency	Community Development Department
Funding Sources	General Fund
Relevant Policies	1.2, 2.2, 2.4, 4.1, 4.2, 4.3
Fair Housing Issue	Fair Housing Enforcement; Disparities in Access to Opportunity for Persons with or without Disabilities

Contributing Factor(s)	Regulatory barriers to providing housing and supportive services for persons with disabilities; Lack of zoning for a variety of housing types
Program/Action Type	New Housing Choices and Affordability in Areas of Opportunity • Increasing housing choices and affordability by removing regulatory barriers to development (e.g., going beyond State law requirements and implementing fair housing practices by completing amendments to the Zoning Code to allow residential care facilities in all residential zones, including RS and RM zone). • Improve certainty in the development approval process through objective processes and code amendments to remove regulatory barriers and increase housing choices and opportunities for special housing types in areas with access to opportunity and resources. • Zoning to allow supportive housing by right and increase housing choices, and opportunities for the development of supportive housing community wide and therefore in higher opportunity areas.

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. As part of the strategic and regional approach the City has taken to address homelessness, City works with its regional partners at the SBCCOG and Harbor Interfaith Services to connect individuals experiencing homelessness to resources in the South Bay region. Part of these efforts include the Homelessness Task Force which is comprised of city leaders and service providers in the South Bay. The Task Force convenes once every two months to discuss innovative new solutions to combat homelessness, regional updates, and State/Federal updates. The City will increase regional coordination through active participation in SBCCOG Homeless Services Task Force meetings once every two months with neighboring and regional South Bay 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.

Objective	• Seek additional funding sources for continued support services for the population experiencing homelessness. • 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. • 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. • Increased regional coordination through active participation in SBCCOG Homeless Services Task Force.
Timeframe	• Ongoing monitoring of funding sources throughout planning period and apply for additional funding opportunities annually during the planning period, where available, beginning January 2023. • Ongoing – quarterly communications with partner agencies and organizations. • Update resource guide on City website annually during the planning period, to reflect any changes to program or resource offered for those experiencing homelessness. • Participate in Homelessness Task Force meetings once every two months with neighboring and regional South Bay cities.
Responsible Agency	Community Development Department
Funding Sources	Grant awarded from the Los Angeles County Measure H funds; General Funds for the staff time (grant applications and educational material).
Relevant Policies	2.3, 3.1, 4.1, 4.3
Fair Housing Issue	Disproportionate Housing Needs; Fair Housing Enforcement and Outreach Capacity

Contributing Factor(s)	Lack of resources for individuals who need supportive services; regional coordination
Program/Action Type	Housing Mobility Strategies; Place-based Strategies • Increased regional coordination through active participation in Homelessness Task Force meetings once every two months with neighboring and regional South Bay cities.

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).

Objective	• Identify and track surplus City-owned sites. Report on these lands annually through the Housing Element Annual Progress Report. • Comply with Surplus Land Act requirements set forth in Government Code Section 54220-54234.
Timeframe	• Annually conduct inventory and report surplus and excess local public lands on or before April 1 of each year. • Ongoing compliance with Surplus Land Act throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	Community Development Department
Relevant Policies	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.[11] 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

[11] Public Policy Institute of California. 2016. https://www.ppic.org/wp-content/uploads/R_1016AER.pdf.

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 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.

Objectives	• Review green building techniques in the MBMC to ensure compliance with State requirements. • Amend the MBMC to conform to future amendments or updates to State Green Building Standards Code if necessary.
Timeframe	• Review of green building techniques in City codes by January 2024. • Update the MBMC within 1 year after any future amendments or updates to the California Green Building Standards Code.
Responsible Agencies	• Community Development Department
Funding Sources	City General Fund
Relevant Policies	3.2, 3.3, 3.4

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City of Manhattan Beach

6th Cycle Housing Element

Appendices



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>
<tr><th colspan="2">Table 1. Evaluation of Previous Housing Element Implementation</th></tr>
<tr><th>Policy</th><th>Progress/Effectiveness/Appropriateness</th></tr>
<tr><td colspan="2">Goal 1. Preserve existing neighborhoods.</td></tr>
<tr><td colspan="2">Policy 1. Preserve the scale of development in existing residential neighborhoods.</td></tr>
<tr><td>
Program 1a. – Continue to enforce provisions of the Zoning Code which specify District Development Regulations for height, lot coverage, setbacks, open space, and parking.
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:
<table>
<tr><th>District</th><th>Maximum Lot</th></tr>
<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>
</table>
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.
Responsibility: Community Development Department
Funding: City General Fund
Schedule: On-going
</td><td>
Progress: 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.

Effectiveness: 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.

Appropriateness: 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.”
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Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Objective: Continue to preserve the character of existing neighborhoods *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.	
Program 1b. – Continue to apply the Design Overlay as provided under Section 10.44 of the Municipal Code, as appropriate. 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: D1) Rosecrans Avenue, where higher fences in the front-yard setback area are needed to reduce traffic noise; D2) 11th Street, where limitations on building height and density are needed to minimize building bulk and buffer adjoining residences; D3) Gaslamp neighborhood, where special design standards and review procedures are needed to preserve existing neighborhood character; D4) Traffic noise impact areas, where higher fences are needed to reduce traffic noise; D5) North end commercial, where special design standards are needed to accommodate additional residential development; 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; 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** On-going **Objective:** Preserve neighborhood character citywide.	**Progress:** 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. **Effectiveness:** The program successfully enforces specific development standards for each overlay zone while taking into consideration the unique nature of each given neighborhood. **Appropriateness:** 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).

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Program 1c. – Refrain from approval of lot mergers that would result in a reduction in the number of residences allowed. 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** On-going **Objective:** Preserve neighborhood character citywide	**Progress:** 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. **Effectiveness:** 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. **Appropriateness:** 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.
Policy 2. Preserve existing dwellings.	
Program 2a. – Allow non-conforming dwellings to remain and improve. 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. **Responsibility:** Community Development Department **Funding:** City General Fund	**Progress:** Planning staff continuously processes Minor Exceptions, which serve to incentivize preservation of smaller, more affordable housing units by allowing minor additions and remodels. **Effectiveness:** 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. **Appropriateness:** 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.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Schedule: On-going **Objective:** Preserve smaller, more affordable housing units	
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. 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. 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. 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. **Responsibility:** Community Development Department **Funding:** CDBG **Schedule:** Throughout the planning period. **Objective:** Preserve/improve 16 low and moderate income units	**Progress:** 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. **Effectiveness:** 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. **Appropriateness:** 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.
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.	
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.	

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Program 3a. – Continue to facilitate infill development in residential areas. 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** On-going **Objective:** Increase the supply of housing through infill development	**Progress:** 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. **Effectiveness:** 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. **Appropriateness:** 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.
Program 3b. – Facilitate multi-family residential development in the CL, CD, and CNE commercial districts. 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.	**Progress:** 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. **Effectiveness:** 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.

Table 1. Evaluation of Previous Housing Element Implementation

Policy	Progress/Effectiveness/Appropriateness
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: 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). 2. The City will facilitate consolidation and development of small parcels through the following actions: • Assist affordable housing developers in identifying opportunities for lot consolidation using the City's GIS system and property database; • Provide a graduated density bonus for lower-income housing developments that consolidate small parcels into a larger building site according to the following formula:	**Appropriateness**: 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: • Removing discretionary actions related to PDPs to create a truly administrative non-discretionary approval process. • 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. • Adopting development standards for multifamily residential and mixed-use projects in the three commercial zones (CL, CD, and CNE).

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

*Excluding density bonus

• Expedite processing and waive fees for lot consolidations processed concurrently with other planning entitlements for affordable housing developments;
• Publicize the program on the City's website, at the Planning counter, and by notice to affordable housing providers.

Responsibility: Community Development Department
Funding: City General Fund
Schedule: Throughout the planning period.
Objective: Provide adequate sites to accommodate the City's lower-income RHNA allocation

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Program 3c. – Continue to provide for a mixture of uses in the Manhattan Village area. 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** On-going **Objective:** 25 senior units	**Progress:** A mixture of uses in Manhattan Village continues to be maintained. The parking lot has not been redeveloped to date. **Effectiveness:** 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. **Appropriateness:** 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.
Program 3d. – Ensure that development standards for residential uses in the CD and CNE Districts do not pose unreasonable constraints to housing. 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. **Responsibility:** Community Development Department **Funding:** City General Fund	**Progress:** 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. **Effectiveness:** The program will be carried forward because staff has only seen partial progress on this effort. **Appropriateness:** 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.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Schedule: Review development standards and process a Code amendment by December 2014 **Objective:** Facilitate development of affordable multi-family and mixed use developments	
Program 3e. – No Net Loss 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. 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** Continue to implement Government Code Section 65863 **Objective:** Ensure no net loss of housing capacity throughout the planning period.	**Progress:** 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. **Effectiveness:** This program is effective and necessary, and required by State law; therefore, it is appropriate to carry forward. **Appropriateness:** Continue. Revise as needed to comply with current State law.
Policy 4. Preserve the existing affordable housing stock.	
Program 4. – Regulate the conversion of rental housing to condominiums. 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. **Responsibility:** Community Development Department **Funding:** City General Fund, condominium application fees **Schedule:** On-going	**Progress:** Implementation of these regulations continued through the 5th Cycle. **Effectiveness:** No affordable units were converted to condominiums during the 5th Cycle. Program is effective and should continue. **Appropriateness:** Revise to focus on replacement requirements for all housing types in accordance with SB 330 (2019).

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Objective: Preserve 12 affordable units	
Policy 5. Encourage the development of additional low- and moderate-income housing.	
Program 5a. – Provide incentives for housing affordable to low-income households and senior housing. 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. **Responsibility:** Community Development Department **Funding**: City General Fund **Schedule:** Ongoing implementation of the Density Bonus ordinance. **Objective:** Additional affordable housing units commensurate with the City's RHNA allocation	**Progress:** 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. **Effectiveness:** Two density bonus projects are in the planning process currently (401 Rosecrans and 1701 Artesia). **Appropriateness:** Revise accordingly to comply with current density bonus requirements (Assembly Bill 1763/SB 2263).
Program 5b. – Streamline the development process to the extent feasible. 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** Throughout the planning period. **Objective:** Streamline the development review process for multi-family development.	**Progress:** 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. **Effectiveness:** The streamlined permitting option is effective, and the Zoning Code should be amended to accurately reflect the policies in the Housing Element. **Appropriateness:** 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.
Program 5c. – Allow the establishment of manufactured housing on single-family residential lots. 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	**Progress:** The Municipal Code continues to accommodate manufactured housing. **Effectiveness:** No permits have been requested or granted for this type of residential structure during this planning period. Currently,

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
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. 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** Ongoing. **Objective:** Continue to facilitate development of manufactured housing as a means of reducing housing cost.	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. **Appropriateness:** 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)).
Program 5d. – Work with the private sector to facilitate the provision of low-and moderate-priced housing. 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. To increase the likelihood of additional affordable housing development during the planning period, the City will take the following actions: • Assist developers in identifying suitable sites for affordable housing • Provide fast-track processing • Provide density bonus, modified development standards and other concessions • Prioritize funding for projects that include extremely-low-income units • Reduce development fees if feasible • Provide administrative assistance with grant funding applications	**Progress:** 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. **Effectiveness:** The program is effective in that one density bonus project is currently in review and a second is pending submittal. Carry forward. **Appropriateness:** Revise to comply with Assembly Bill 1483 transparency requirements.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Responsibility: Community Development Department **Funding:** City General Fund **Schedule:** Meet with interested affordable housing developers when opportunities arise. **Objective:** Facilitate the production of new affordable units commensurate with the City's RHNA allocation	
Program 5e. – Allow second units in residential areas. 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. **Responsibility:** Community Development Department **Funding:** City General Fund **Schedule:** Adopt a Second Unit ordinance by December 2014 **Objective:** Encourage production of second units	**Progress:** 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. **Effectiveness:** 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. **Appropriateness:** 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).
Policy 6. Encourage means of increasing ability to afford existing housing stock.	
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. 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. **Responsibility:** Los Angeles Community Development Commission; Publicized by City Community Development Department **Funding:** Federal Section 8 funds	**Progress:** 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. **Effectiveness**: Staff continues to publicize availability of resources when requested. Can continue the program and enhance the City's website with information.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Schedule: Ongoing. Publicize to landlords and tenants via City newsletter, link on City website or other means. **Objective:** Facilitate rent subsidies for very-low- and extremely-low-income residents through Section 8 vouchers.	**Appropriateness:** Update program to include a quantifiable objective and enhance City's website.
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.	
Program 7a. – Continue to participate in area-wide programs to ensure fair housing. 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. **Responsibility:** Community Development Department **Funding:** General fund/CDBG **Schedule:** Ongoing, annual review **Objective:** Address 100 percent of fair housing complaints	**Progress:** 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: • 2014–2015: 14 residents • 2015–2016: 11 residents • 2016–2017: 15 residents • 2017–2018: 14 residents • 2018–2019: 16 residents • 2019–2020: 6 residents • 2020–2021: 12 residents Total: 88 residents* *See additional details in Appendix D, Affirmatively Furthering Fair Housing. **Effectiveness:** All housing-related complaints are directed to the Housing Rights Center. **Appropriateness:** 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.
Program 7b. – Provide for the housing needs of seniors. 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	**Progress:** All 81 affordable units have been preserved during this planning period.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
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. 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. **Responsibility:** California Housing Finance Agency **Funding:** State of California **Schedule:** On-going **Objective:** Preserve 81 affordable senior units	**Effectiveness:** The program is effective, as the City has experienced zero loss of affordable units, and will continue. **Appropriateness:** 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.
Program 7c. – Provide for the special needs of seniors so that they may remain in the community. 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: 1. Locates suitable (often more affordable) housing. This may include referrals to "board and care" residential facilities in Manhattan Beach, or multi-family apartments; 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; 3. Coordinates "Rotary Cares," a volunteer program, which rehabilitates two senior homes per year, consisting of minor repairs, plumbing, carpentry, painting, etc., 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,	**Progress:** The City continues to contract with Beach Cities Health District for Care Management needs (https://www.bchd.org/home-services-care-management). 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 (https://www.manhattanbeach.gov/departments/parks-and-recreation/older-adults-program). 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.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
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. 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. **Responsibility:** Fire Department/Senior Services Care Manager **Funding:** General Fund/Beach Cities Health District/CDBG Funds **Schedule:** On-going; add shared housing program in 2014 **Objective:** Maintain part-time Senior Services Care Manager	**Effectiveness:** This program is effective and should be continued. The older adults of the community regularly rely on these resources for services and programming. **Appropriateness:** The program remains appropriate and will be continued, with revision to the funding sources.
Program 7d. – Reasonable accommodation for persons with disabilities. 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. **Responsibility:** Community Development Department **Funding:** General Fund **Schedule:** Throughout the planning period **Objective:** Continue to implement procedures for ensuring reasonable accommodation	**Progress:** The City continues to implement Reasonable Accommodation policies, and received and approved one request during the planning period. **Effectiveness:** The program is effective and should be continued. **Appropriateness:** Program will be revised to remove any potential constraints related to the approvals process in the City's Reasonable Accommodation Ordinance.
Program 7e. – Emergency shelters and transitional/supportive housing. The Zoning Code allows emergency shelters "by-right" subject to appropriate development standards consistent with SB 2 in the Public & 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. Transitional housing is defined in *Health and Safety Code* 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	**Progress:** 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. **Effectiveness:** The City should continue to facilitate the program and make these options available in the event that an application is submitted. **Appropriateness:** Revise to comply with current State law, including adding Low-Barrier Navigation Center requirements.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
above is permitted as a residential use subject to the same permitting processes and requirements as other similar housing types in the same zones. 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. **Responsibility:** Community Development Department **Funding:** General Fund **Schedule:** Throughout the planning period **Objective:** 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.	
Goal 3. Provide a safe and healthy living environment for City residents.	
Policy 8. Eliminate potentially unsafe or unhealthy conditions in existing residential development.	
Program 8a. – Continue the active code enforcement program for illegal and substandard units. 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. **Responsibility:** Community Development Department **Funding:** General Fund **Schedule:** On-going **Objective:** Respond to 100 percent of reports of substandard units	**Progress:** 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. **Effectiveness:** Both components of this program are effective and will be continued. **Appropriateness:** Continue and incorporate Code Enforcement's efforts related to substandard housing conditions, and related resources for residents related to attenuation of those issues.
Goal 4. Encourage the conservation of energy in housing.	
Policy 10. Encourage the use of alternate energy.	
Program 10. – Waive fees for installation of solar panels. 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.	**Progress:** 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. **Effectiveness:** The program is effective and should be continued.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Since 2008, in order to encourage use of alternate energy the City has waived any building fees for photovoltaic panels. **Responsibility:** Community Development Department **Funding:** General Fund **Schedule:** On-going **Objective:** Process permits for new solar panels at no cost.	**Appropriateness:** Continue; program remains appropriate.
Policy 11. Reduce energy loss due to inferior construction/development techniques.	
Program 11a. – Enforce green building techniques. The City has adopted the California Energy Code. In addition, the City requires the following: • 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 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. **Responsibility:** Community Development Department **Funding:** General Fund **Schedule:** On-going **Objective:** 100 percent compliance for new units	**Progress:** 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. **Effectiveness:** 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. **Appropriateness:** Continue; program remains appropriate.
Program 11b. –Encourage water conservation. 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. **Responsibility:** Community Development Department	**Progress:** 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. **Effectiveness:** 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.

Table 1. Evaluation of Previous Housing Element Implementation	
Policy	**Progress/Effectiveness/Appropriateness**
Funding: General Fund **Schedule:** On-going **Objective:** Reduced water consumption	**Appropriateness:** Continue; program remains appropriate.
Policy 12. Encourage reduction in energy consumption for commuting to work and other activities.	
Program 12 – Provide a balance of residential and employment-generating uses in the City, including mixed-use projects. 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. **Responsibility:** Community Development Department **Funding:** General Fund **Schedule:** On-going. **Objective:** Continue to encourage mixed use projects	**Progress:** 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. **Effectiveness:** 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. **Appropriateness:** 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).

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
Total	38	419

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.

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.[1]

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,

[1] 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.

Table 3. Population Age Groups (2019)

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%
Total	35,500	100%	10,081,570	100%
Median age	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)**.

Table 4. Race/Ethnicity (2019)				
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%
Total	35,500	100%	10,081,570	100%
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.

Table 5. Employment by Occupation (2019)		
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		

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%
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%

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
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.

Table 9. Household Composition (2019)				
Household Type	Manhattan Beach		Los Angeles County	
	Households	Percent of Total Households	Households	Percent of Total Households
Family Households	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%
Non-Family Households:	3,846	28.6%	1,123,683	33.8%
–Householder living alone	3,034*	78.9%*	449,473*	40%*
Households with Individuals Under 18 Years	4,766	35.5%	1,051,774	31.6%
Households with Individuals 65 Years and Over	5,411	40.3%	1,328,031	39.9%
Total Households	13,427	100.0%	3,328,398	100.0%
Average Household Size	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.

Table 10. Household Tenure (2019)				
Housing Type	Manhattan Beach		Los Angeles County	
	Units	Percent	Units	Percent
Occupied Housing Units	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	—
Vacant Housing Units	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%
Total Housing Units	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.

Table 11. Overcrowding (2019)				
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)**.

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.

Table 13. Annual Income Limits for Los Angeles–Long Beach–Glendale Metro Fair Market Rent Area (2020)

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.

Table 14. Overpayment by Tenure (2017)

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%
Low-income households	850	—	525	—
Households overpaying	455	53.5%	450	86%
Subtotal: All Lower-Income Households	**1,810**	**—**	**945**	**—**
Subtotal: Households Overpaying	**995**	**55%**	**789**	**83.5%**
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%
Total	3,866	100%
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%
Total units	15,128	100%	3,425,736	100%
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 unhabitable 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
Total	9,344
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)**).

Table 22. 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 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.

Table 23. Older Adult Households by Tenure in the City (2019)				
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.

Table 24. Older Adult Households by Income and Tenure in Manhattan Beach (2020)				
Income Category	Owner	Renter	Total	Percent of Total Older Adult Households
<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	• Provides a variety of recreational activities, classes, and special programming for older adults. • Location for the Manhattan Beach Senior Club.
Skilled Nursing	
Lawndale Healthcare & Wellness Centre 15100 Prairie Avenue Lawndale, CA 95014 310.679.3344	• 59-bed nursing and rehabilitation facility, providing 24-hour care, seven days a week. • Long-term and short-term care. Services include a variety of therapies.
Providence Transitional Care Center 4320 Maricopa Street Torrance, CA 90503 310.303.5900	• 115-bed facility providing skilled nursing services to patients in a post-acute care setting.
Independent Living	
Manhattan Beach Senior Villas 1300 Park View Avenue Manhattan Beach, CA 90266 310.546.4062	• 104-unit affordable senior housing apartment for 65+ and 55+ for residents with disabilities persons 55+. • 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.
Heritage Pointe Senior Apartments 1801 Aviation Way Redondo Beach, CA 90278 310.318.8418	• 135-unit apartment complex for 62+ lifestyles. • Includes a variety of community amenities such as a pool, library, clubhouse, and disability access.
Assisted Living	
Josephine's Garden Villa 521 North Rowell Avenue Manhattan Beach, CA 90266 310.606.2110 License # 198203121	• Six private rooms, accommodating one person per room. • Services include continuous observations, care and supervision, daily needs assistance, medication management, and transportation.
Mansel Guest Home 317 South Aviation Avenue Manhattan Beach, CA 90266 310.345.5561 License # 197607748	• 6-bed, private home. • Provides customized care programs, as well as workout programs, medication services, activities, and home-cooked meals.
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.	• 95-room and 115-bed facility. • Includes common areas such as foyer, parlor, bistro, dining rooms, and activity rooms) • Offers 64 assisted living rooms and 31 memory care rooms for Alzheimer's patients and individuals with memory loss.

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.

Table 26. Household Size by Tenure in the City (2019)

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.

Table 27. Median Household Income by Household Size

Household Size	Median Household Income
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.

Table 28. Household Type by Tenure in the City (2019)				
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 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.

Table 29. Emergency and Supportive Housing Resources

Provider	Address	Number of Beds	Services	Average Number of Beds Available on Any Given Night (Estimate)
Beacon Light/Doors of Hope	525 Broad Avenue, Wilmington, CA 90744	15/15	Bed, showers, clothing, and meals	2–3
CES Crisis/Bridge Housing – US Vets Inglewood	733 Hindry Avenue, Inglewood, CA 90301	30	Bed, showers, clothing, and meals	5–7
CES Bridge Housing Program for Women – US Vets Long Beach	2001 River Avenue, Long Beach, CA 90810	30	Bed, showers, clothing, and meals	1–2
CES Bridge Housing Project Achieve – Catholic Charities	1368 Oregon Avenue, Long Beach, CA 90813	20	Bed, showers, clothing, and meals	2–5
Long Winter Shelter – Volunteers of America Los Angeles	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.[1]

[1] 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.

Table 1. Residential Land Use Categories in the City's General Plan

Area District	Low-Density Residential (Maximum Density)	Medium-Density Residential (Maximum Density)	High-Density Residential (Maximum Density)
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	51.2 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 supplementary development standards tailored to the neighborhood conditions of each design overlay district. The additional objective development standards do not have an independent process or approval, as they are folded into the plan check and require the same approval body as other required entitlements.

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, predominantly serving to protect residential uses from commercial use impacts. The City does not regulate design through any form of a design review board, commission, panel or any design-related findings or requirements. The requirements of these overlay districts instead act as additional objective development standards and are treated as supplemental Zoning Code standards and are folded into the review of development standards.

The intent of the Zoning Code is to apply these objective standards and ensure compliance during plan check unless the proposed use requires a discretionary approval based solely on base-district regulations, and in accordance with the MBMC, the land-use and development regulations applicable in a design overlay district shall be as prescribed for the base zoning district with which it is combined and does not outline a separate approval process for the design overlay districts. In accordance with Section 10.44.040 (Building permits to conform to overlay district regulations) of the MBMC, applications for building permits in the design overlay district are accepted as follows:

> "Applications for building permits for projects within a D overlay district shall be accepted only if project plans are consistent with the development regulations of this chapter and with all other applicable requirements of this Code. The regulations imposed by this section shall apply to any new structures or improvements, intensification of use, or enlargement of an existing structure."

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 – 11th 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 may pose a constraint to development in that it would increase the time and cost associated with redevelopment of single-family homes in the area.

While the environmental assessment may pose 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 built-out, 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.

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**
Accessory Dwelling Unit	P	P	P	P	P	P	P	P
Accessory Structure[1]	P/U	P/U	P/U	P/U	P/U	—	—	—
Day Care, Small Family Home	P	P	P	P	P	P	U	L[2]
Day Care, Large Family Home	L[3]	L[3]	L[3]	L[3]	L[3]	L[3]	L[3]	L[3]
Emergency Shelters[4]	—	—	—	—	—	—	—	—
Group Residential	—	—	U	—	U	—	—	—
Home Occupation	Home Occupation Permit[5]					—	—	—
Manufactured Housing (on a permanent foundation)	P	P	P	P	P	—	—	—
Mixed-Use	—	—	—	—	—	U	U	U
Multifamily (5 or fewer units)[6]	—	P	P	P	U	U	U	U
Multifamily (6 or more units)[6]	—	PDP/SDP	PDP/SDP	PDP/SDP	U	U	U	U
Residential Care, General[7]	—	—	U	U	U	—	—	—
Residential Care, Limited	P	P	P	P	P	—	—	—
Single-Family	P	P	P	P	P	U	U	L[8]
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

1. See MBMC Section 10.52.050, Accessory Structures.
2. 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.
3. 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.
4. Emergency shelters are permitted by-right in the Industrial Park (IP) District and the Public and Semipublic (PS) District.
5. 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.
6. A Use Permit is required for any condominium development or conversion of three or more units.
7. 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.
8. 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[1]

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; L = Limited (see additional use regulations)

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.

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 Multi family 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[1]	**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.

Table 5. Manufactured Housing Requirements	
General Requirements	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.
Requirements for Certificates of Compatibility	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.
Location Criteria	Manufactured homes shall not be allowed: a. On substandard lots that do not meet the dimensional standards of Chapter 10.12; b. As an additional unit on an already developed lot; c. As an accessory building or use on an already developed lot; or 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%).
Design Criteria	Manufactured homes shall be compatible in design and appearance with residential structures in the vicinity and shall meet the following standards: a. Each manufactured house must be at least sixteen feet (16') wide; b. It must be built on a permanent foundation approved by the Community Development Director; 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; d. The unit's skirting must extend to the finished grade; e. Exterior siding must be compatible with adjacent residential structures, and shiny or metallic finishes are prohibited; f. The roof must have a pitch of not fewer than three inches (3") vertical rise per twelve inches (12") horizontal distance; 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; h. The roof must have eaves or overhangs of not less than one foot (1'); i. The floor must be no higher than twenty inches (20") above the exterior finished grade; and j. Required enclosed parking shall be compatible with the manufactured home design and with other buildings in the area.
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.[1]
- 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.[2]

[1] 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).

[2] 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. Additionally, the development standards do not prevent housing developments from achieving the maximum height permitted in accordance with the MBMC development standards and are not considered a barrier to development. Furthermore, the height limits, which apply to all zones regardless of if they are in the coastal or non-coastal zones, do not prevent development from achieving the maximum densities or number of stories permitted, and in determining compliance with the maximum building height limits prescribed for each zoning district, flexibility is provided for maximum height through below grade flexibility, so long as a building does not exceed a maximum allowable height by more than 20 percent. In addition, in all residential districts, 70 percent of floor area in a basement that is not entirely below local grade, and up to 200 square feet of basement area used for storage and mechanical equipment purposes, is excluded from the determination of buildable floor area. In multifamily residential districts, the area used exclusively for vehicle parking and loading are also excluded from buildable floor area.

Given the high cost of land, most developers are motivated to achieve the maximum height and densities permitted on the typical small lots in the City, and the City is accustomed to working with developers and architects in these cases. For example, by taking a visual inventory of the existing housing stock along Highland Avenue, one of the main roads in the City, between 26th Street and Marine Avenue, 21 of 23 existing residential buildings that front Highland Avenue are three stories and only two existing residential buildings are two stories, and the majority of the buildings have portions that appear to be partially below grade. Meaning that over 90 percent of the existing residential buildings were able to achieve three stories under the existing height limit of 30 feet and utilize the flexibility afforded by the Zoning Code. The photograph below is provided from the visual inventory. The photograph is looking southeast on Highland Avenue and shows the typical housing stock, with a three-story quadplex and a three-story condominium building at the forefront.



Source: Google Maps, 2022.

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, which as detailed below, the City implements in accordance with State density bonus law and is not prevented in any way from doing so in any zone by the voter initiative.

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. One such example discussed in **Appendix E**, the Verandas Project, approved by the City's Planning Commission in April 2022, includes the demolition of existing structures and the construction of a new, 96,217 square-foot, four-story multifamily residential structure, 37 to 50-feet in height, containing 79 rental dwelling units, six of which will be set aside for very low-income households, with an attached 127-car, subterranean garage. Under the existing base zone, CNE in Area District III (RH, Area District III development standards currently apply; see **Program 18** for program related changes), the project's maximum density is 51.2 dwelling units per acre and the maximum height permitted is 30 feet and three stories. Given that the project site is 1.02 acres, the base zone permits for 52 units and three stories. However, through use of a density bonus permitted under State law and the City's existing lot consolidation incentive which grants a separate bonus, it is very evident and clear that the project is exceeding the permitted base zone standards, with a density of approximately 77 dwelling units per acre and four stories.

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.

Refer to **Section 2.6** for further analysis.

Table 6a. Residential Development Standards by Zone for Area District I and II						
Development Regulation	Area District I			Area District II		
	RS	RM	RH	RS	RM	RH
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.					

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.

Table 6b. Residential Development Standards by Zone for Area District III and IV						
Development Regulation	Area District III			Area District IV		
	RS	RM	RH	RS	RM	RH
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	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.**

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. In addition, the program identifies strategies to mitigate potential parking constraints in the Coastal Zone.

See additional discussion in **Section 2.6**, Analysis of Local Efforts to Remove Constraints and Facilitate Affordable Housing.

Table 7. Parking Requirements for Residential Land Uses	
Unit Type	**Required Parking**
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."
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 35th Street and 24th Street, along Grandview Avenue

between 24th Street and 21St street, along Valley Drive between 20th Street and 10th Street, and along Bayview Drive from 10th 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 potential constraint to development, the reduction of permit processing time associated with City approval afforded by the certified LCP 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.

Program 22 of the Housing Element addresses parking in the Coastal Zone.

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 Group Residential

Group residential uses are not considered a residential care facility and is defined in MBMC Section 10.08.030.C as shared living quarters 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.

See **Program 28** for additional action the City will take to remove barriers to development as it relates to residential care facilities.

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).

2.2.8 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).

2.2.9 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.

2.2.10Single-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 charges 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, and remove fees for reasonable accommodation requests. 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. 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.

The City does not consider the permitting timeframes for single-family or multifamily development to be a constraint, however, the City understands that unforeseen potential delays in processing development applications and plans can increase time and costs considerably for development projects. Additionally, discretionary processes create uncertainty in the development process and increase project timelines. Therefore, **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 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.

2.5.2 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.

The Citywide user fee schedule, including Planning and Building fees (also shown as Combination Permit Fees based on project square footage), are provided at the end of this appendix in **Exhibit A, City of Manhattan Beach User Fee Schedule**. (Combination permit fees help streamline the fees for the developers and the City, as there is one total fee that needs to be paid for plan check and for inspection services.)

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**. These example fees in **Table 9** are based on recent projects and the actual fees associated with the projects. The fees included in **Table 9** reflect all applicable fees as provided in **Exhibit A**, including the combination planning and building permit fees as reflected in the Plan Check fees in **Table 9**. (All new construction and tenant improvement fees are set up as combo permit fees to include Mechanical, Electrical, and Plumbing, streamlining the fees for the developers and the City, as there is one total fee that needs to be paid for plan check and for inspection services.) No fees from **Exhibit A** have been omitted from the typical fees for single- and multifamily development shown in **Table 9**. No permit processing and planning fees, or development and impact fees and exactions have been excluded from the examples for typical fees provided in **Table 9**.

Table 9. Typical Fees for Single-Family and Multifamily Development		
Planning/Building Fees	**Single-Family***	**Multifamily****
Processing Fees		
Parcel Map	N/A	$1,397
Coastal Development Permit	$1,509	N/A
Site Development Permit[1]	N/A	$6,388
Plan Check	$7,733.55	$23,297.02
Record Retention Fee	$191	$191
Impact Fees		
Quimby/Parkland Fee[2]	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.
Estimated Total Fees	**$26,980.40**	**$97,792.27**

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.

1. 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.

[2]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[3]" 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.

As is the case in all jurisdictions, other planning fees (that are not included in the typical fees in **Table 9** since typical projects are not subject to these fees) for specific reviews or entitlement applications, such as General Plan or Zoning Map amendments, may be required for specific projects only when that project requires that particular review or entitlement. Unlike fees tied to required building permits, fees tied to specific planning review or entitlement applications are not required for all construction or development project.

While it is not common for projects in the City to require some of these applications, these other planning fees would only be required for the following specific reviews or entitlements: Development Agreement, Specific Plan, Specific Plan Amendment, General Plan Amendment, Zoning Text or Map Amendment, Environmental Impact Report Review, or Neighborhood Overlay District (which shall be by amendment to the Zoning Map). For each of the aforementioned planning reviews or entitlement applications there is a required deposit-based fee of $20,000,[4] which was established City Council Resolution 16-0037.

Unlike fees tied to required building permits, fees tied to specific planning applications are not required for all construction or development project. For example, while the MBMC (Chapter 10.40, Neighborhood Conservation Overlay[5] (NC)) provides a procedure in which property owners within a minimum contiguous area of 2 acres may initiate and file an application with the City to initiate a Neighborhood Conservation Plan for the designation of the area as an NC District and associated Zoning Map amendment. The designation, which shall be by amendment to the Zoning Map, is just an authority within the Zoning Code that provides a broader, comprehensive option for community members, and is not a typical application permit or fee that is relevant to a typical multifamily or single-family project. (No housing development would be subject to this fee, and it is not relevant as a permit processing and planning fee, or development and impact fees and exactions.) The City adopted the ordinance

[3] Report on the Cost of Services (User Fee) Study, City of Manhattan Beach, 2020. https://www.manhattanbeach.gov/home/showpublisheddocument/44350/637338561824300000

[4] Deposit-based fees to ensure consistency with other fees. Actual cost for such fees as appropriate for providing the service based on staff time and materials.

[5] Per Chapter 10.40 of the MBMC, the NC Overlay District is intended for property owners to initiate programs for the revitalization or conservation of older areas or districts possessing distinctive features, identity, or character worthy of retention and enhancement. The NC district takes effect through adoption of a plan and a set of regulations that will facilitate upgrading of the neighborhood and development of vacant lots while reducing or eliminating incompatible mixes of uses. An NC Overlay District shall include a minimum contiguous area of 2 acres, including intervening streets and alleys, and shall contain at least 3 separate parcels. Adoption of an NC Overlay District proposal shall be by amendment to the zoning map, but the map amendment shall not alter the use regulations or development standards of the underlying district. A Neighborhood Conservation Plan shall be approved by the City Council at the same time as the map amendment is adopted and shall establish standards and conditions for development consistent with the purposes of the plan.

authorizing the NC Overlay District in 1991, but there are no existing NC Overlay Districts in the City and staff is unaware of any applications received for a proposed NC Overlay.

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.

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. **Program 22** also includes measures aimed at mitigating parking requirements tied to requirements in the Coastal Zone.

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 for all residential zones 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. As previously described, the provision only applies when there is amendment to the following RS, RM, and RH zoning district standards:

- An increase to maximum: height or buildable floor area,
- Or to reduce minimum: setbacks, lot dimensions, or lot area per dwelling unit.

Generally, the City's development standards are fairly liberal, and standards allow for maximum densities and height to be achieved in each residential zoning district, and nearly all lots in the RS, RM and RH districts have existing residential uses.

Current densities permitted in the RS, RM, and RH districts are provided in **Table 1.** The City's permitted densities in the RS, RM, and RH districts are more permissive and higher than a lot of comparable cities, including coastal cities with similar residential and land characteristics. The permitted densities are consistent with the type of development in the General Plan and enable a variety of typical single- and multifamily housing typologies (e.g., townhomes, duplexes, quadplexes, garden apartments, multi-story apartments). Maximum densities are as high as 51.2 dwelling units per acre and permitted densities in the RM and RH districts surpass the default density of 30 dwelling units per acre, allowing sufficient density to accommodate the economies of scale needed to produce affordable housing. Increasing the current densities higher than the maximum 51 units per acre permitted in those residential zones would be difficult to achieve on small lots due to the need for parking and the desire of the residents for adequate living space.

The existing development standards (refer to **Tables 6a** and **6b**), for residential development do not impede the ability to achieve maximum allowable densities. As discussed in **Section 2.1.3**, the permitted maximum height standards do not constraint development's ability to achieve maximum densities, or the maximum stories permitted (including three stories for RH multifamily districts community wide). The City offers flexibility in maximum height through existing standards (e.g., below grade flexibility), and qualifying density bonus projects may exceed the height limit. Furthermore, countless existing residential structures community wide are three stories.

The existing requirements do 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**.

The requirements of the voter initiative are not considered to constrain the City's ability to provide flexibility through existing standards or incentives, or to constrain development to meet the housing need of the City through a variety of housing types or income levels. However, the City is mitigating potential constraints to development of housing or removing other constraints through the following programs (not an exhaustive list of programs that demonstrate local efforts to remove constraints to meet the housing need for all income levels and housing types):

- Through implementation of **Program 2, Adequate Sites**, of the Housing Element, the City will establish an overlay district that encompasses a minimum of 20.6 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 uses to create an opportunity for future multifamily residential development on sites identified outside of RS, RM, and RH districts. The 20.6 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. (The City will provide for an additional buffer of sites in addition to the 20.6 acres, going above and beyond the City's shortfall of sites. Refer to **Program 2** for full details.)

- 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) and ensure a streamlined approval process (including an objective approval process for Precise Development Plans), 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[6] or reduce the site's residential development capacity, consistent with the Housing Crisis Act of 2019.

- Through **Program 3**, the City will streamline permitting procedures for multifamily development. Ensuring an objective approval process (PDP) to facilitate development community wide. The Housing Education Advisory Committee and Housing Education Forums series through **Program 14**, provides robust outreach and education efforts related to residential density and design, including affordable and multifamily housing, to help decision makers and community members understand ways to meet the City's housing needs through different strategies for design,

[6] 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.

density, and affordability. Through **Program 16** will expand the existing lot consolidation incentive to create new opportunities for bonus incentives through base density bonuses in exchange for lot consolidation and **Program 23** aims to preserve existing housing stock and protect opportunities for additional residential development in the residential districts and excludes multifamily housing with three or more units from minimum and maximum lot sizes.

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. The existing lot consolidation incentive provides an additional density bonus incentive beyond what is permitted under State law for multifamily residential developments in exchange for lot consolidation, which will be bolstered through **Program 16**. Additionally, the City's Local ADU Ordinance goes beyond State requirements. While current State law permits one ADU and one JADU and ADUs for existing multifamily dwelling units, the City complies with State law, and allows more flexibility by allowing two ADUs on a lot with a proposed or existing single-family dwelling in all districts, and one ADU on a lot with a newly constructed multifamily development in all districts. The City also provides opportunities in 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.

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.[7] 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,[8] the average cost for

[7] UC Riverside School of Business, 2020. Demystifying the High Cost of Multifamily Housing Construction in Southern California. https://ucreconomicforecast.org/wp-content/uploads/2020/03/UCR_CEFD_Multifamily_Housing_White-Paper_3_2020.pdf.
[8] 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.[9] 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.

[9] 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

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, 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 Categorically 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 regard 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.

Table 10. Summary of Quantified Objectives for 6th Cycle (2021–2029)

Income Category	6th Cycle RHNA	New Construction	Rehabilitation	Conservation/ Preservation
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
TOTALS	**774**	**674**	**16**	**84**

EXHIBIT A - City of Manhattan Beach User Fee Schedule

Community Development Department Fees.....Page 2

Non Community Development Fees.....Page 20

Variable Fees.....Page 29

Referenece Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
		PLANNING FEES			
	Use Permit	**Use Permits:**			
20-085		Review an application for use permit for conformity with code requirements.	Use Permit	$ 6,396.00	$ 8,393.00
		Master Use Permits:			
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

CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020

Referenece 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 ot other that is NOT a Small Cell or eligible facility)	$ 2,746.00	$ 2,428.00
20-109			Ammendment - Private property (Macro, Tower ot other that is NOT a Small Cell or eligible facility)	$ 1,172.00	$ 1,706.00

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

Referenece 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

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

Referenece 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. ****Performance Bond also required.**	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. ***This fee is set by Council Policy.***	Appeal to PC - Admin	**$ 500.00**	**$ 500.00**
20-135		Appeal an administrative decision to the City Council. ***This fee is set by Council Policy.***	Appeal to CC - Admin	**$ 500.00**	**$ 500.00**
20-136		Process an appeal to the City Council of the PPIC - related to traffic .***This fee is set by Council Policy.***	Appeal to CC - PPIC (Traffic)	**$ 500.00**	**$ 500.00**

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

Referenece 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. ***This fee is set by Council Policy.***	Appeal to CC - PPIC (Encroachment)	**$ 500.00**	**$ 500.00**
20-138		Process an appeal to the City Council of a Planning Commission Decision. ***This fee is set by Council Policy.***	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**

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CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020

Referenece 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. ****Map Copy Deposit of $500**		**$ 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**

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Referenece 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
		TRAFFIC ENGINEERING			
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. ***This fee is set by Council Policy***		$ 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. ***This fee is set by Council Policy***		$ 100.00	$ 100.00
20-179	Stop Sign Request (2nd Request)	Processing a request to install a stop sign following initial denial / approval. ***This fee is set by Council Policy***		$ 500.00	$ 500.00
20-180	Appeal to PPIC	Appeal an administrative decision to the Parking & Public Improvement Commission. ***This fee is set by Council Policy***	Traffic	$ 500.00	$ 500.00
20-181			Encroachment	$ 500.00	$ 500.00

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Referenece 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**
BUILDING DIVISION FEES - FLAT AND MISCELLANEOUS					
20-183	**Building / Trades Permit Extension**	Extension of building, mechanical, electrial, 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. ***[See MBMC 9.01.050]***	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

Referenece Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
20-198	**Construction Site Sign Production**	Processing and production of contractor information signs for construction sites.	Base Fee	**$ 26.00**	**$ 32.00**
20-199			Per Sign	**$ 30.00**	**$ 30.00**
20-200	**Building Permit Transfer**	Transfer the ownership of a permit.		**$ 53.00**	**$ 65.00**
20-201	**Residential Bldg Records Report**	Provide a building records report on an address.	Per Application	**$ 309.00**	**$ 294.00**
20-202			Duplicate	**$ 53.00**	**$ 43.00**
20-203	**Staging Residential**	Review request for staging for residential properties.		**$ 761.00**	**$ 295.00**
20-204	**Temporary Certificate of Occupancy**	Review request for a temporary Certificate of Occupancy to allow for occupancy before the final certificate is issued.	Certificate	**$ 1,760.00**	**$ 666.00**
20-205			Extension	**$ 237.00**	**$ 302.00**
20-206	**Board of Building Appeals**	Processing an appeal of a Building Administrative Decision to the Board of Building Appeals.		**$ 488.00**	**$ 938.00**
20-207	**Comm Dev Refund Processing**	Processing a refund of a Community Development fee due to the actions of the applicant.		**$ 92.00**	**$ 112.00**
20-208	**Comm Dev Record Retention**	Retaining a permanent copy of records in Community Development.	Base Fee	**$ 35.00**	**$ 43.00**
20-209			Digital Copy	**$ 53.00**	**$ 65.00**
20-210			Data Extraction:	**$ 67.00**	**$ 83.00**
20-211	**Garage Sale Permit**	Review an application for a garage and yard sale permit. The municipal code allows 3 permits per household per year.		**$ 8.00**	**$ 11.00**

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CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020

Referenece Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
	Building Permits (Combination)				
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
	Building Permits (Miscellaneous)				
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 ***[Plan Check and Inspection are set by council at $50 each and both are required for permit issuance]***	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

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CITYWIDE USER FEE SCHEDULE (COMMUNITY DEVELOPMENT) - ADOPTED FEBRUARY 18, 2020

Referenece 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**

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Referenece Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
	Mechanical, Electrical, and Plumbing Permits				
	Electrical				
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**
	Mechanical				
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**

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Referenece Number	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE APRIL 18, 2020
	Plumbing				
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**
	Code Enforcement Fees				
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**
		RIGHT-OF-WAY (ROW) FEES			
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**

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Referenece 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
	Excavation Permit - Involves Breaking Ground/Infrastructure		**Non-Utility Excavation**		
20-295			Curb & Gutter	$ 231.00	$ 337.00
20-296			Sidewalk	$ 231.00	$ 337.00
20-297			Driveway Approach	$ 231.00	$ 337.00
20-298			Add-Ons	$ -	$ 60.00
20-299			Extend	$ -	$ 60.00
	Excavation Permit - Involves Breaking Ground/Infrastructure		**Utility Excavation**		
20-300			Sewer Line	$ 393.00	$ 474.00
20-301			Water Line	$ 393.00	$ 474.00
20-302			Undergrrounding	$ 393.00	$ 474.00
20-303			Sewer/Water Line Combo	$ 393.00	$ 474.00
20-304			Add-Ons	$ -	$ 60.00
20-305			Extend	$ -	$ 60.00
			Utility Company Excavation		
20-306			0-200 l.f.	$ 393.00	$ 641.00
20-307			200+ l.f.	$ 1,038.00	$ 1,128.00
20-308			200+ l.f. per l.f.	$ 2.00	$ 2.00
20-309			Extra Inspections - per hr	$ -	$ 110.00
20-310			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 - ***Set by Statute***	$ 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
A - New (Other than A2)	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
A2 - New	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 or M - New	Business or Retaial	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
E - New	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
F-1, F-2 - New	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
H1-H5 - New	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
I - New	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
L - New	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
R-1 - New	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
R-2 - New	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)

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
		CITY CLERK			
20-001	Initiative Petition Processing	A formal notice of intent to circulate an initiative petition for a municipal measure. ***[California Election Code Section - 9202(b)]***		$ 200.00	$ 200.00
20-002	Candidate Processing	Process a candidate for office in the City not to exceed $25. ***[California Election Code Section - 10228]***		$ 25.00	$ 25.00
20-003	Candidate Statement	Process a candidate statement for publication electronically or in voter guide per ***California Election Code Section 13307.***	Bi-Annual (10 or less)	Actual Cost	Actual Cost
20-004	Reproduction Service	Making a copy of a City document upon request. ***[Per City Resolution 6302]***	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
		FINANCE FEES			
20-009	Return Check & Insufficient Funds Fee	Re-processing of checks or other payments due to insufficient funds. ***[California Civil Code Section 1719]***	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

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
PARKS AND RECREATION FEES (NON-PROGRAM / ACTIVITY RELATED)					
20-017	**Banner Installation**	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	**Special Events Application**	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	**Film Permits - Application**	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**
POLICE FEES					
20-024	**Amplified Sound Permit**	Reviewing a Request to use amplified sound in a non-commercial area.		**$ 227.00**	**$ 183.00**
20-025	**Retail Firearm Permit**	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	**Block Party Permit**	Review an application for a block party.		**$ 50.00**	**$ 50.00**
20-028	**Weapons Discharge Permit**	Review an application for a weapons discharge permit within the City.		**$ 601.00**	**$ 603.00**
	COMMUNITY AFFAIRS				
20-029	**Alarm System Permit**	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	**Alarm School**	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**

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

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
	TECHNICAL SUPPORT				
20-032	**Fingerprint Card / Live Scan**	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	**Digital Reproduction**	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	**Police Record Clearance Letter**	Research and prepare clearance letter for individuals requesting the service.		**$ 43.00**	**$ 56.00**
20-036	**Police Photos - Film & Digital**	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	**Data Research and Release**	Research and compilation of data in police records upon request.		**$ 105.00**	**$ 119.00**
20-039	**Special Business - DOJ Check**	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	**Police Reports**	Producing a copy of a police report upon request. ***[Per City Resolution 6302]***	Per Page	**$ 0.10**	**$ 0.10**
	JAIL OPERATIONS				
20-041	**Booking Fee**	Process an individual under arrest for booking. *Plus additional County Fees		**$ 259.00**	**$ 266.00**
	PARKING				
20-042	**Impound Vehicle Release**	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	**Vehicle Inspection / Correction**	Inspect vehicle and sign-off citation for correctable violation.		**$ 26.00**	**$ 27.00**
20-045	**Boot Removal**	Installation and removal of a parking boot, due to non-payment of 5 or more parking citations.		**$ 109.00**	**$ 183.00**
20-046	**Handicap Violation Waiver Admin Fee**	Processing of repeated handicap violation waivers for citations issued to individuals with a handicapped placard. ***No charge for the first waiver.***		**$ 25.00**	**$ 32.00**

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

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
	ANIMAL SERVICES				
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**
		FIRE			
	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	**Operational & State Mandated**		
20-050			0-2,000 SF	**$ 223.00**	**$ 232.00**
20-051			2,000-10,000 SF	**$ 223.00**	**$ 349.00**
20-052			10,000+ SF	**$ 223.00**	**$ 465.00**
20-053			Complex Building	**Actual Cost**	**Actual Cost**
			Multi-Family Dwelling Units		
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) ***[Current fees collected by agreement.]***	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 Califrnia 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**

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

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
20-061	**Fire, Temporary Permit**	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	**Fire Re-Inspection**	Reinspection of an Annual Business Inspection or Temporary Permit **Per hour ~~***No charge for first two inspections.***~~		**$ 223.00**	**$ 232.00**
20-064	**Fire Annual Business Inspection**	Providing an annual fire and life safety inspection of a business with the City. ~~***No Charge for first two inspections***~~	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	**Fire Residential Sprinkler**	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	**Fire Commercial Sprinkler**	Review a plan and inspect a commercial fire sprinkler system for conformity with fire code requirements.	Plan Check	**$ 288.00**	**$ 482.00**
			Inspection:		
20-071			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	**Fire Alarm System**	Review a plan and inspect a fire alarm system for conformity with fire code requirements.	Plan Check	**$ 220.00**	**$ 482.00**
			Inspection:		
20-075			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**

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

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
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. ***[Per Resolution 6262]***	ALS	Current LA County Rate	
20-084		Ambulance transport with basic life support. ***[Per Resolution 6262]***	BLS (Service provided by McCormick Ambulance)	Current LA County Rate	
		PUBLIC WORKS FEES			
	ADMINISTRATIVE				
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**

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

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
20-321	**Barricade Rental (Cont.,)**	*Includes the price of the delineators and signs.	Moving Package - Deluxe	**$ 45.00**	**$ 51.00**
	CIVIL ENGINEERING				
20-322	**Final Tract Map Review**	Reviewing the final tract map to determine extent to which it complies with appropriate code requirements. ****Map Copy Deposit of $500**	Application	**$ 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**
	TREES				
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**
	UTILITIES				
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. ****Meter deposit of $1,500 required.**	Installation	**$ 97.00**	**$ 241.00**
20-336			Move	**$ 77.00**	**$ 145.00**

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

FIRE	Category	Description	Additional Information	Current Fee	ADOPTED FEE EFFECTIVE MARCH 18, 2020
20-337	**Water Meter Test**	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	**Water Service Turn-On**	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	**Water Meter Installation Inspection**	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	**Actual Cost**	**Actual Cost**
20-344	**F.O.G. & Clean Bay Restaurant Inspections**	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	**Clean Bay Restaurant Inspection for Stormwater Permit Compliance**	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	**Waste Management Plan**	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**

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

Other Fees

- **Variable Rate Service**

VARIABLE RATE SERVICE

Category	Description	Current Deposit	Source	New Deposit		Est. Annual Volume
PLANNING						
Development Agreement	Review an application for a development agreement to determine special conditions on a project and provide for future improvements with City Council approval. Minimum Deposit - Actual Cost	**$6,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	1
Specific Plan	Review an application for a specific plan, and make comments and revisions as necessary for a development project. Minimum Deposit - Actual Cost	**$6,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	1
Specific Plan Amendment	Reviewing an application and making recommendations regarding proposed amendments to a specific plan for consideration by the Planning Commission and City Council. Minimum Deposit - Actual Cost	**$10,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	0
General Plan Amendment	Reviewing an application and making recommendations regarding proposed amendments to the City's comprehensive general plan to the Planning Commission and City Council. Minimum Deposit - Actual Cost	**$10,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	1
Zoning Text Amendment	Review an application to amend the text of the municipal code involving zoning. Minimum Deposit	**$10,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	0
Zoning Map Amendment	Review a request to change the regulations established by zoning maps. Minimum Deposit - Actual Cost	**$10,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	1
Environmental Impact Report Review	Review of an Environmental Impact Report of a proposed development. Minimum Deposit - Actual Cost	**$10,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	1
Neighborhood Overlay District	Review an application for new development standards for a specific neighborhood at the request of all the property owners in the affected area. Minimum Deposit - Actual Cost	**$10,000**	Actual cost of providing the service includes time and material (fully burdened rates).	**$20,000**	*	0
Street Name Processing	Processing a request to name a street. Minimum Deposit - Actual Cost	**$1,490**	Actual cost of providing the service includes time and material (fully burdened rates).	**$5,000**	*	0

* Note: <u>This proposed deposit is the minimum amount and may be increased pursuant to an agreement approved by the City Manager or City Attorney</u>

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.[1] 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.

[1] 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").[2] 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

[2] 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 original, 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,[3] 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:

[3] “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).[4] 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.

[4] 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 Majority Race (2018), shows that all of the tracts in the City are populated by a majority of White persons with a "Predominant" gap of greater than 50 percent). There are no other races or ethnicities that form a majority in the City which is reflective of the aforementioned population make up., To further analyze race/ethnicity population trends, **Figure 3, 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). While the tract indicates a predominant White majority, analysis at the block group level in this area indicates that the Asian population is represents the second largest racial group living in this area. When comparing the median income in this block group to the City's median income, there were no significant changes with the block group median income at $130,000 which is in line with the City's median income at $153,023. This area is made up of 65 percent of owner-occupied households. Comparison of tenure by race revealed that while 66 percent of White households were owner occupied, 100 percent of Asian households own a home in this block group. Therefore, there are no other indicators such as income constraints, quality of housing, or other socioeconomic demographics that would indicate a fair housing issue as it relates to the population of Asian persons living in this area of the City.

Figure 4, City Racial Demographics (2010), which illustrates the percent of the total non-White population by Census block group 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[5] areas, the City is among the areas with the lower population of non-White persons, as shown in **Figure 5, 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

[5] "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/.

(complete diversity). **Figure 6, 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 3 and 5**, is the location of the Chevron refinery.

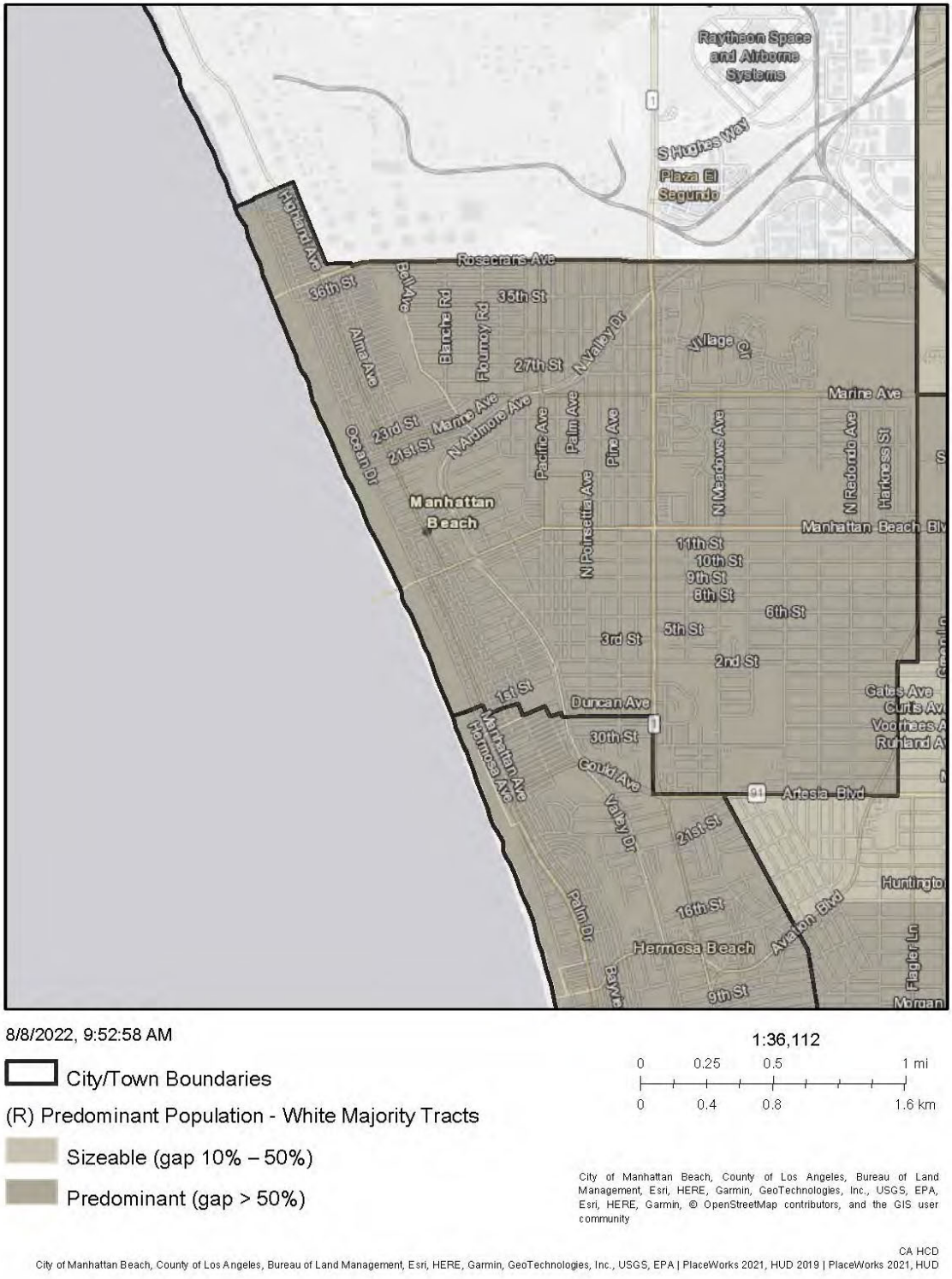


Figure 2. City Majority Race (2018)

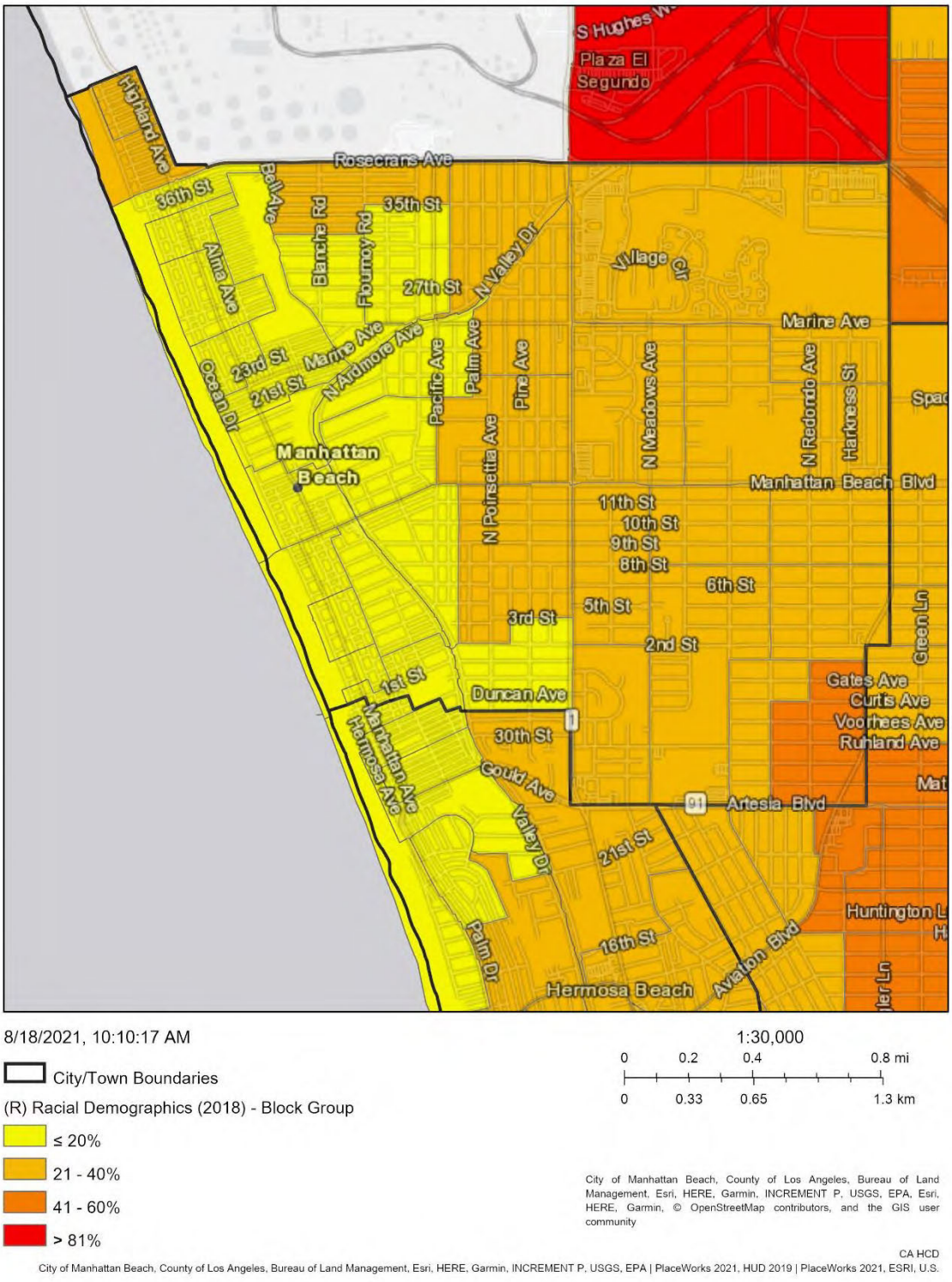


Figure 3. City Racial Demographics (2018)

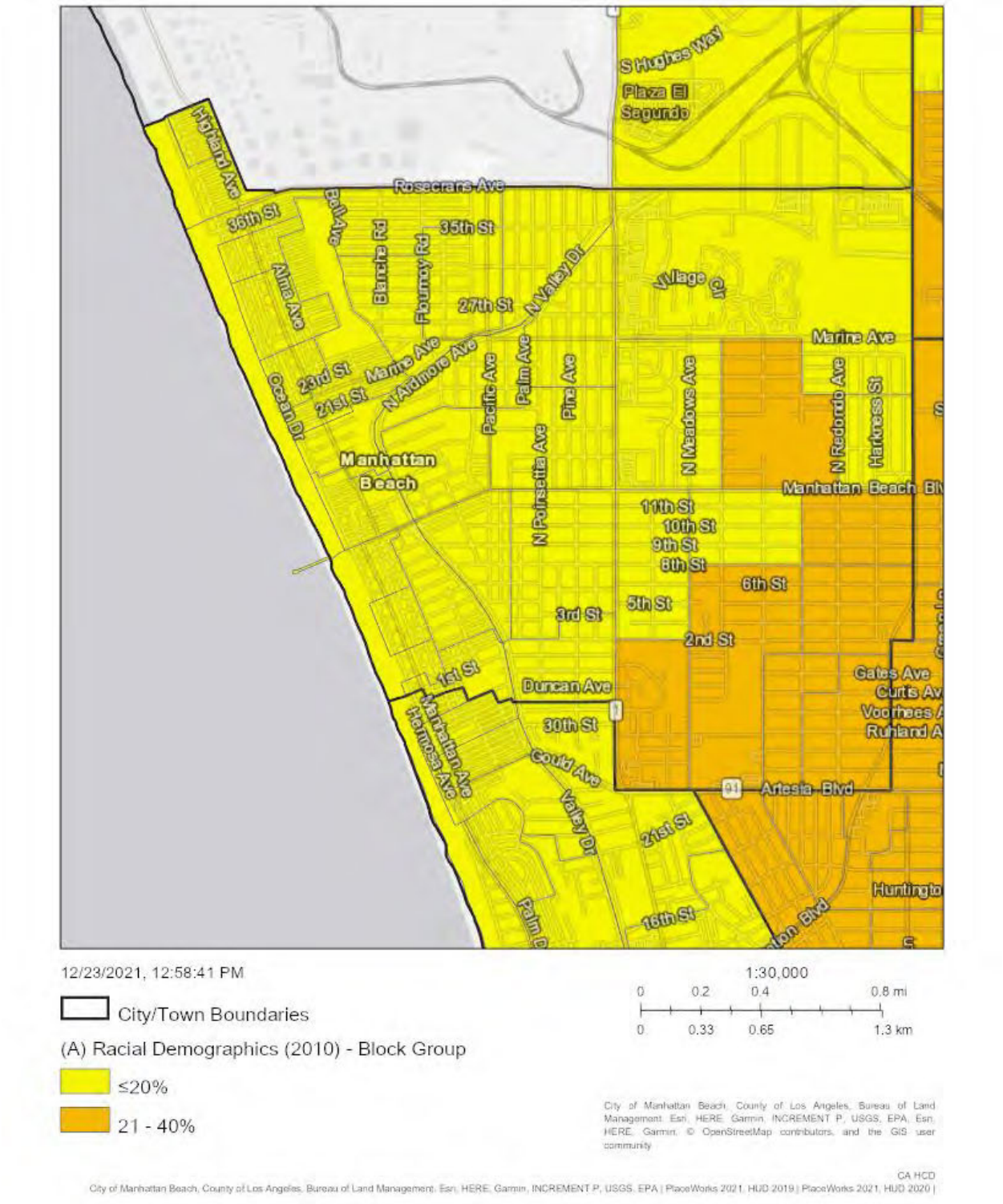


Figure 4. City Racial Demographics (2010)

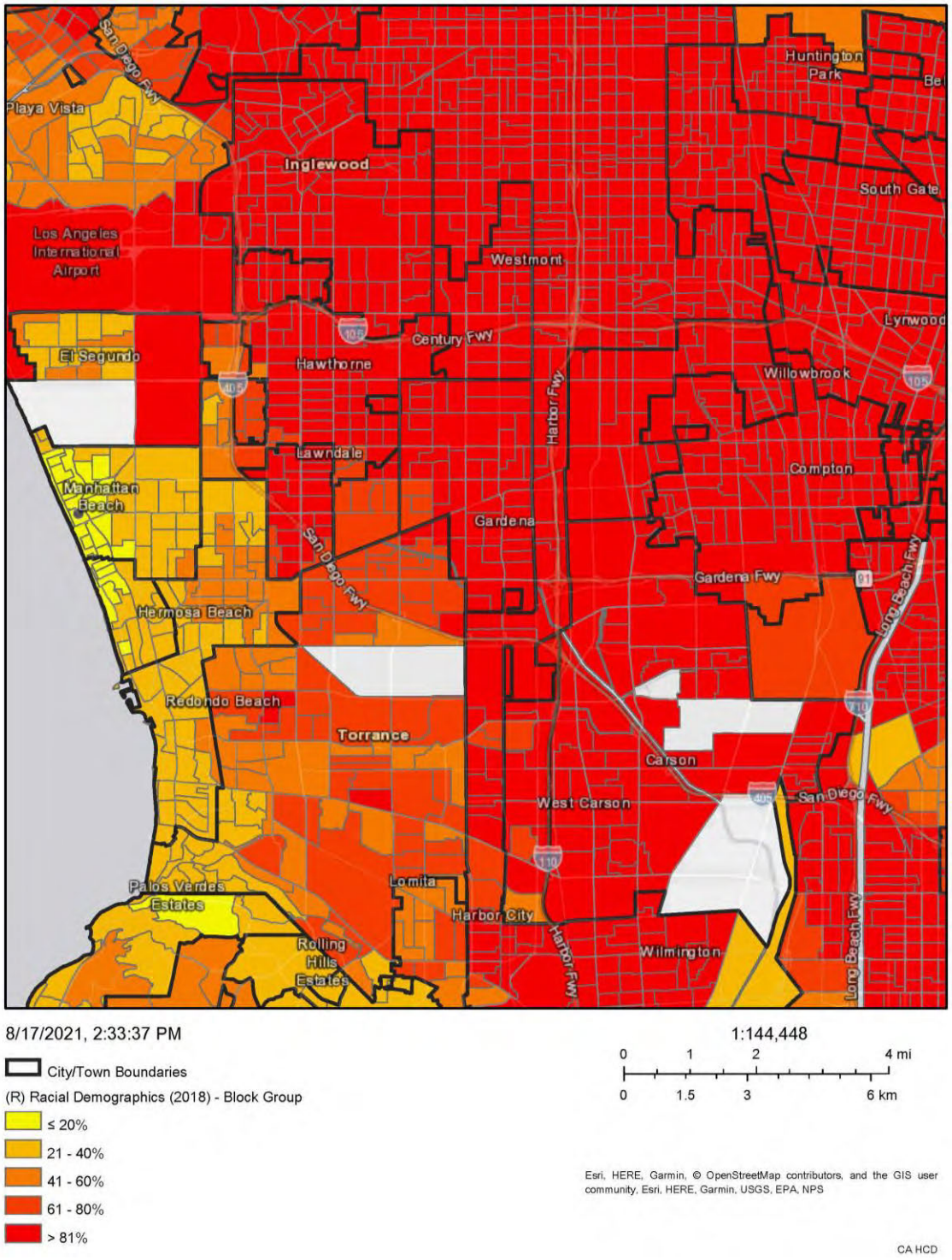


Figure 5. Regional Racial Demographics

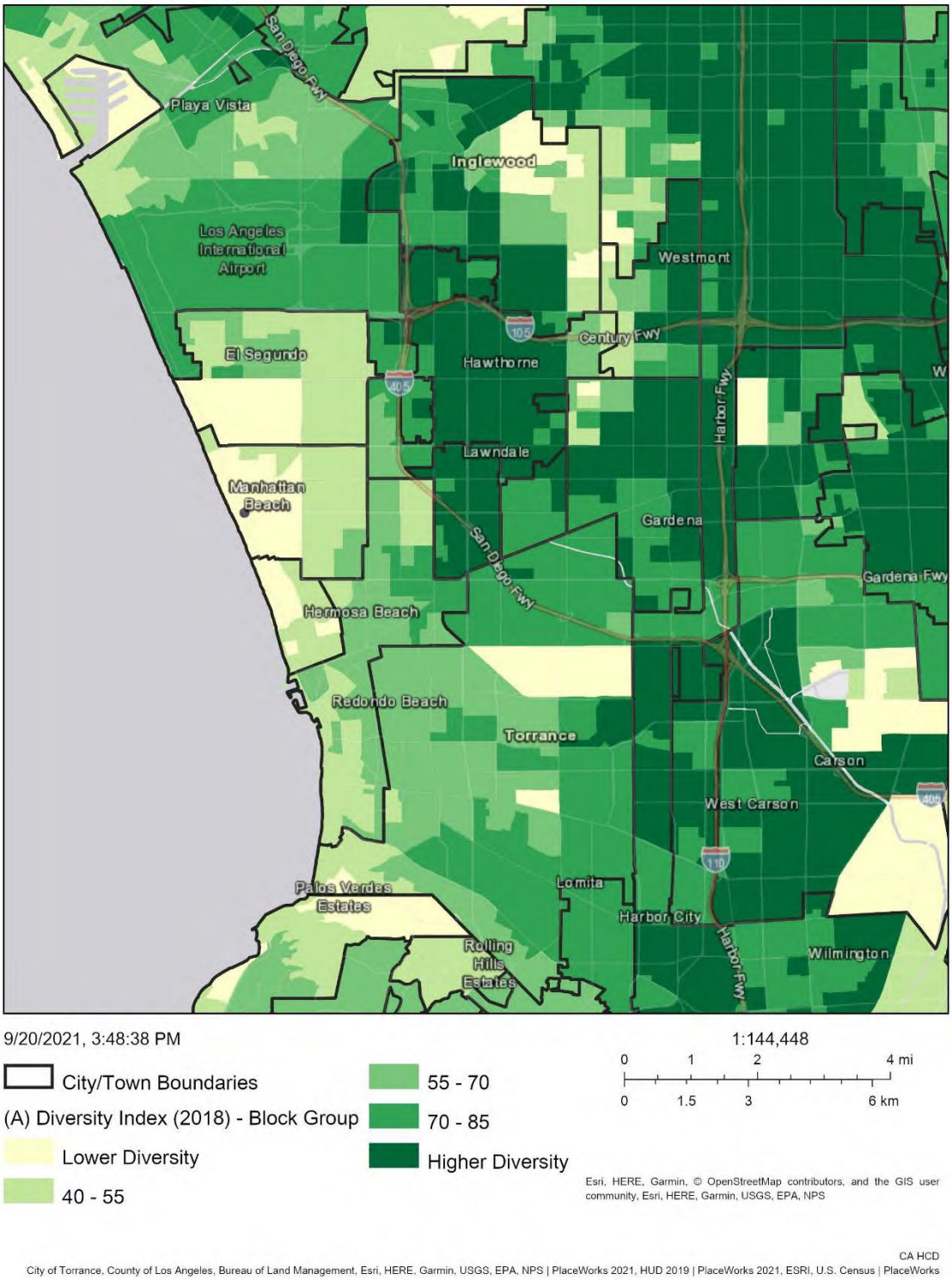


Figure 6. Diversity Index

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.[6] 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 7, 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 8, 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.

Local knowledge attributes the geographical location of this area and the housing stock as contributing factors to this pocket of households with a lower median income when compared to the rest of the City. The area has a high renter population at 53 percent while the City average is 32 percent. This is likely due to the housing stock in this area as it is made up of 48 percent multifamily housing, compared to the City level housing stock at 19 percent multifamily units. As such, this area is more affordable relative to the other areas of the City where more people own their homes and/or rent single family homes. Local knowledge of the area also identifies its location just south of the Los Angeles International Airport which makes this area attractive to younger professionals who work in the aerospace and related industries which are usually a younger individuals with a single income. And therefore, have unique shared living situations as many people who are flight attendants or hold similar jobs often sublet or temporary rent units.

A regional comparison of the median income of $78,833 of this area shows that it is greater than the County's median income by over $7,000 (2020 County median income $71,358). Therefore, while the median income is low, it is only relative to the greater median income groups found in the City. While at a regional level of comparison, the median income is line with median income of households in the County. There are no other race or similar socioeconomic characteristics that have been identified as a contributing factor to a lower median income in this area of the City.

[6] https://www.americanprogress.org/issues/race/reports/2019/08/07/472617/systemic-inequality-displacement-exclusion-segregation/

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 9, Regional Median Income**. **Figure 9** 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 7 and Figure 9**).

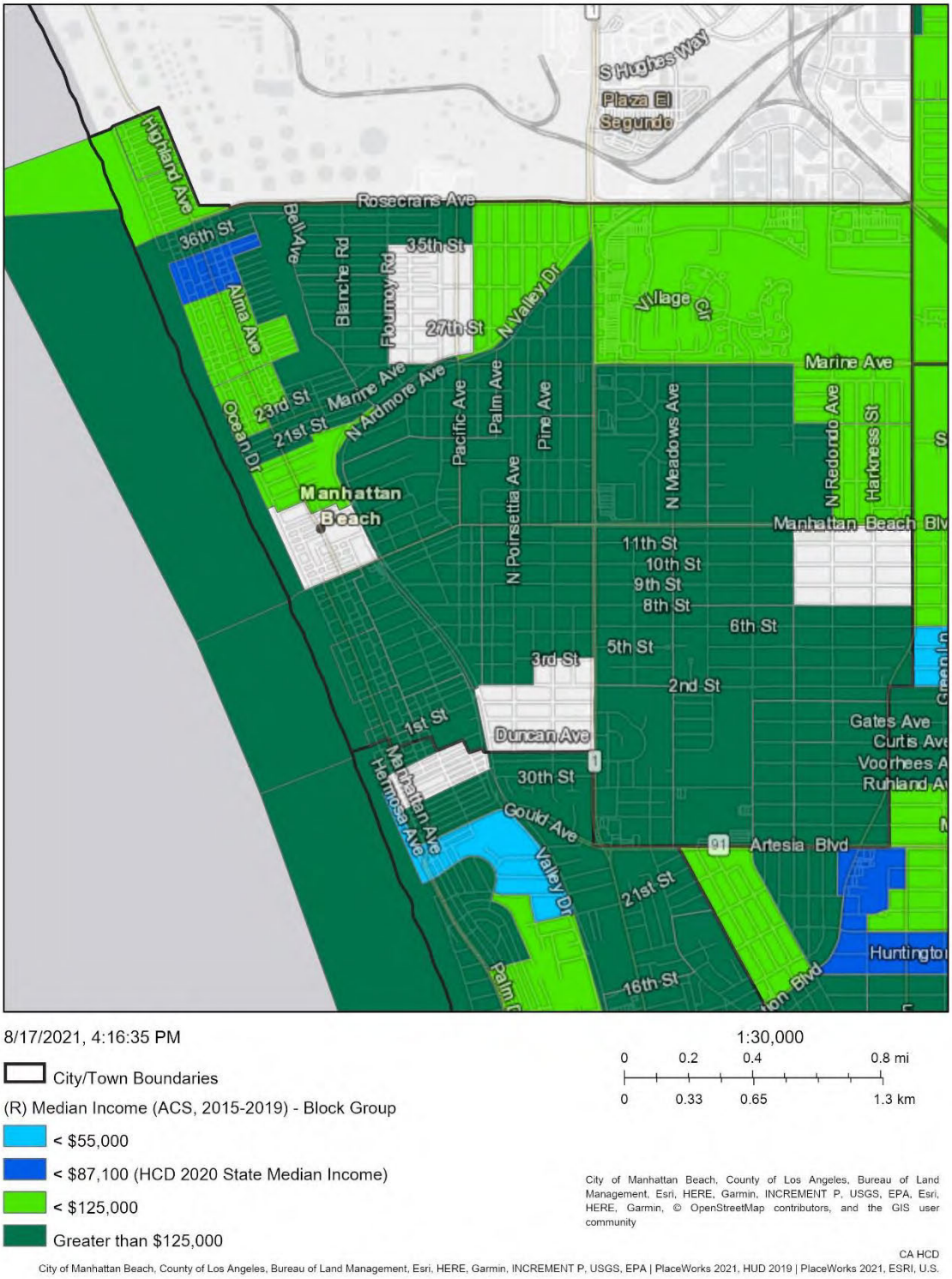


Figure 7. City Median Income (2015-2019)



Figure 8. City Median Income (2010-2014)

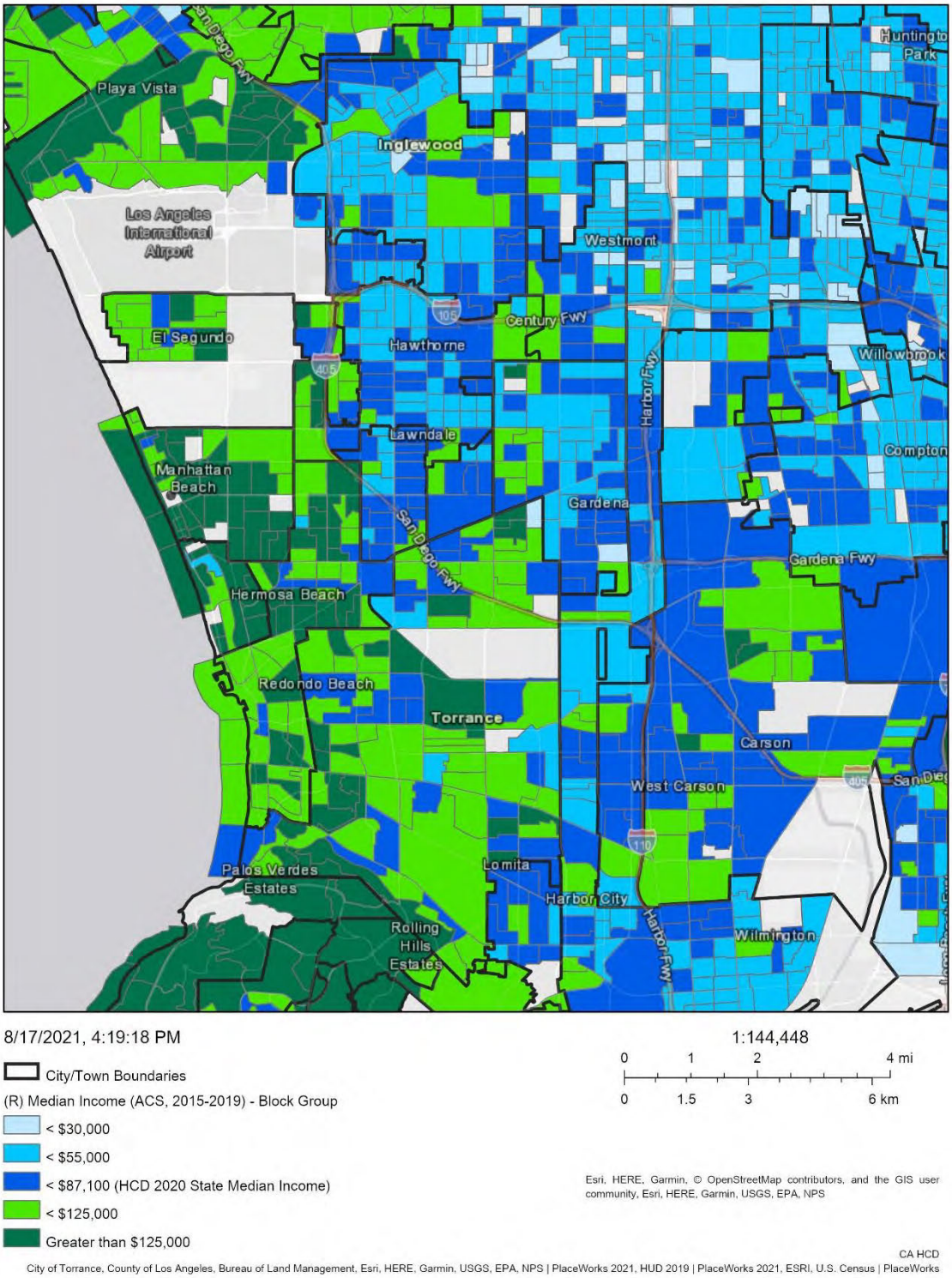


Figure 9. Regional Median Income

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.[7] 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.[8] Therefore, this section will analyze patterns or trends of segregation or integration related to familial status at the local and regional levels.

Figure 10, 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 known as "El Porto" 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. The development history and geography of the El Porto area are two contributing factors identified by local knowledge that explain the higher population of persons 18 years or older living alone. While the City incorporated in 1908, the El Porto area remained part of Los Angeles County unincorporated until approximately 20 years ago (~2002); therefore, development was influenced by development standards set forth by the County and remnants of the County's regulations are visible today through the built environment. A range of housing types and units were developed in this area; the housing stock varies and is made up of 71 percent multifamily housing, 3 percent of which includes multifamily housing with 10 or more units, and the remaining 29 percent are single family units. When compared to the City the inverse is true where the housing stock is made up of 81 percent single family units, 19 percent multifamily units of which 18 percent of multifamily housing have 10 or more units. With relatively affordable housing options, single income, typically, younger individuals are able to afford rent in this area and are less likely able to finance a purchase of a home. This is supported by age and tenure trends in this area as the median age is 34.8 years and over 50 percent of the population are between 22-44 years old and a renter population of 48 percent. The rest of the City houses older age groups and families with age range from 44 to 45 years old and higher median age varying from upwards of 41 years old and has an average renter population of 32 percent.

The geographical location of this area coupled with housing stock characteristics make this area more attractive for young professionals as the area is near the Los Angeles International Airport, and the

[7] https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf
[8] https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf

growing technology and aerospace industries established in Playa Vista, El Segundo, and surrounding areas. There is no other income related, race, or similar socioeconomic characteristics that have been identified as a contributing factor to the population living alone in this census tract. While the City is creating opportunities for a range of housing types including affordable housing in other areas of the City through Program 2 and other programs in the Housing Element, the City cannot influence geographical preferences for people who want a short commute to work.

In contrast, **Figure 11, 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 12, Children in Married-Couple Households**, and **Figure 13, Children in Single-Headed Households**, show the percentage of children in married-couple and single-headed households at the tract level. **Figure 12** 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 13** 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 of higher percentages (60 percent to 80 percent) in Inglewood and Playa del Rey–Westchester, located north of the Los Angeles International Airport (LAX).

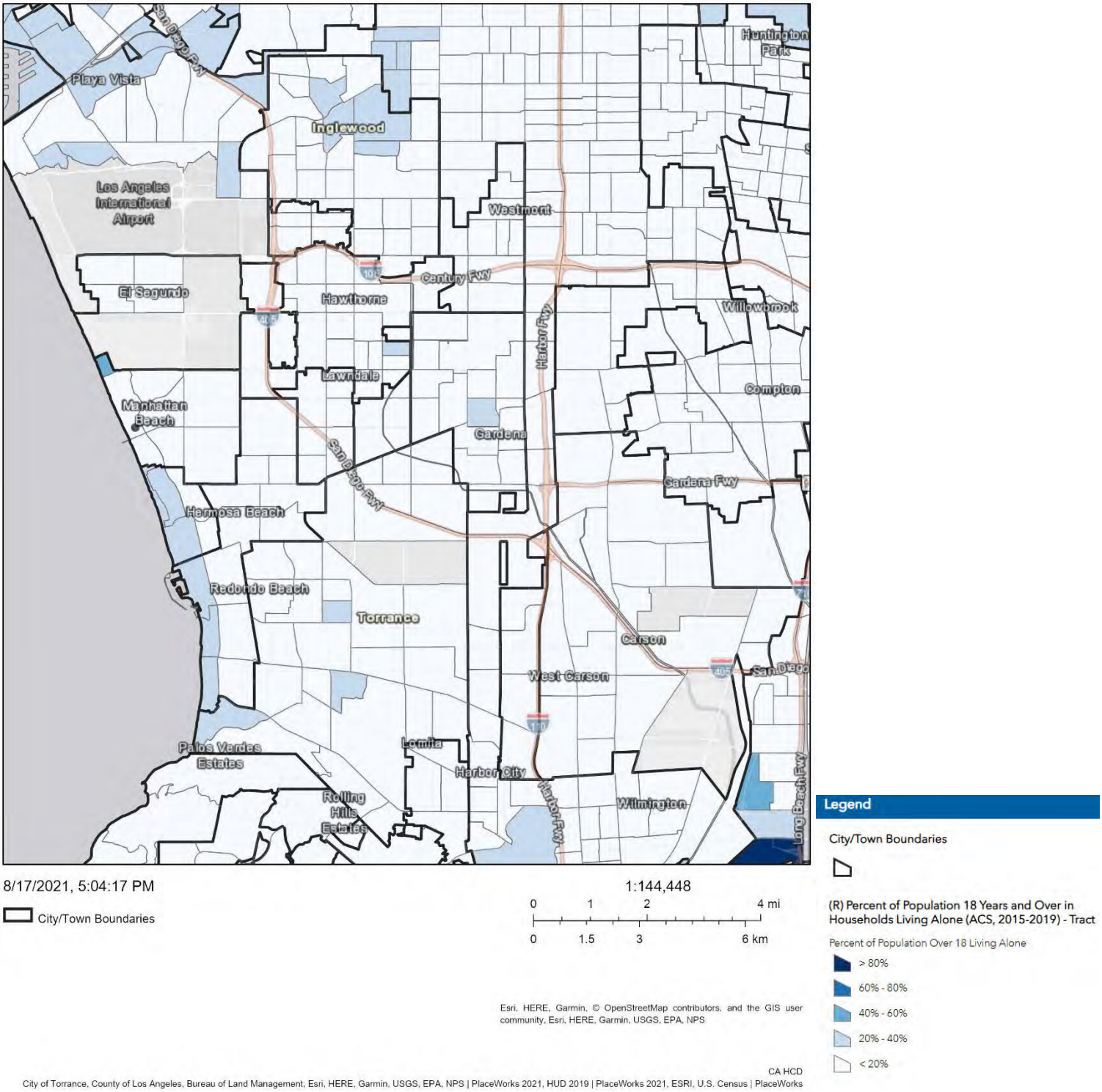


Figure 10. Population Living Alone

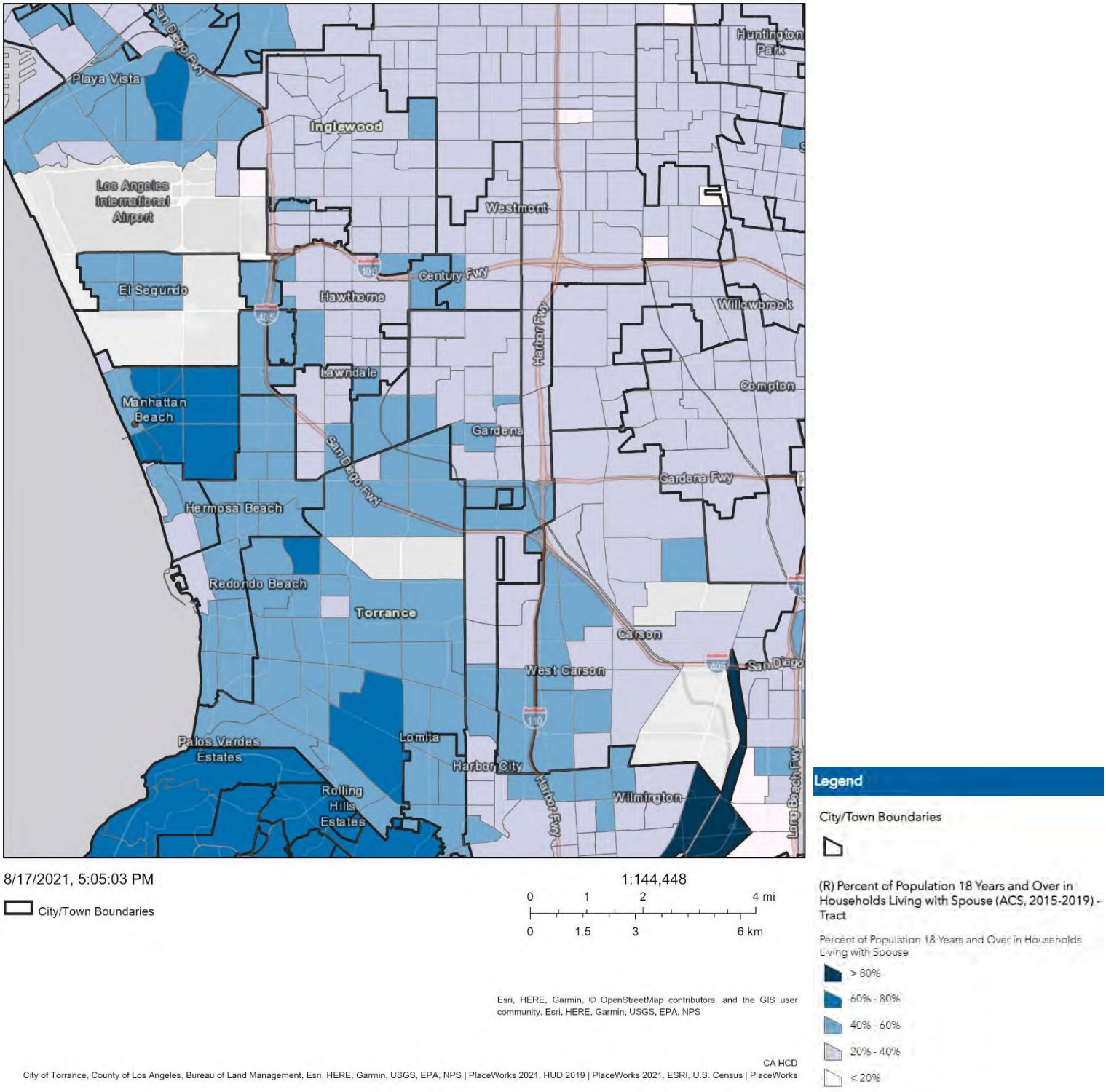


Figure 11. Population Living with a Spouse

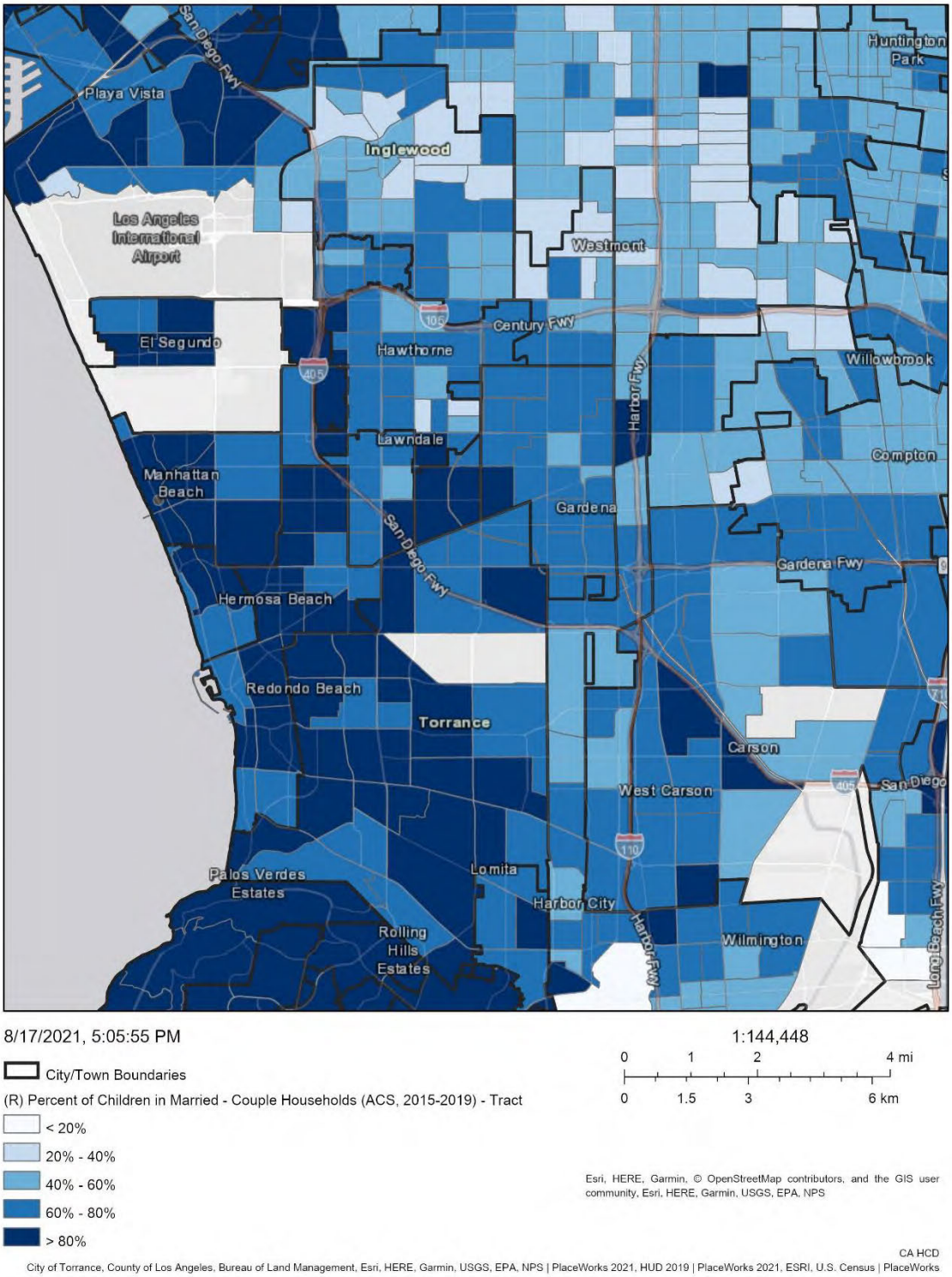


Figure 12. Children in Married-Couple Households

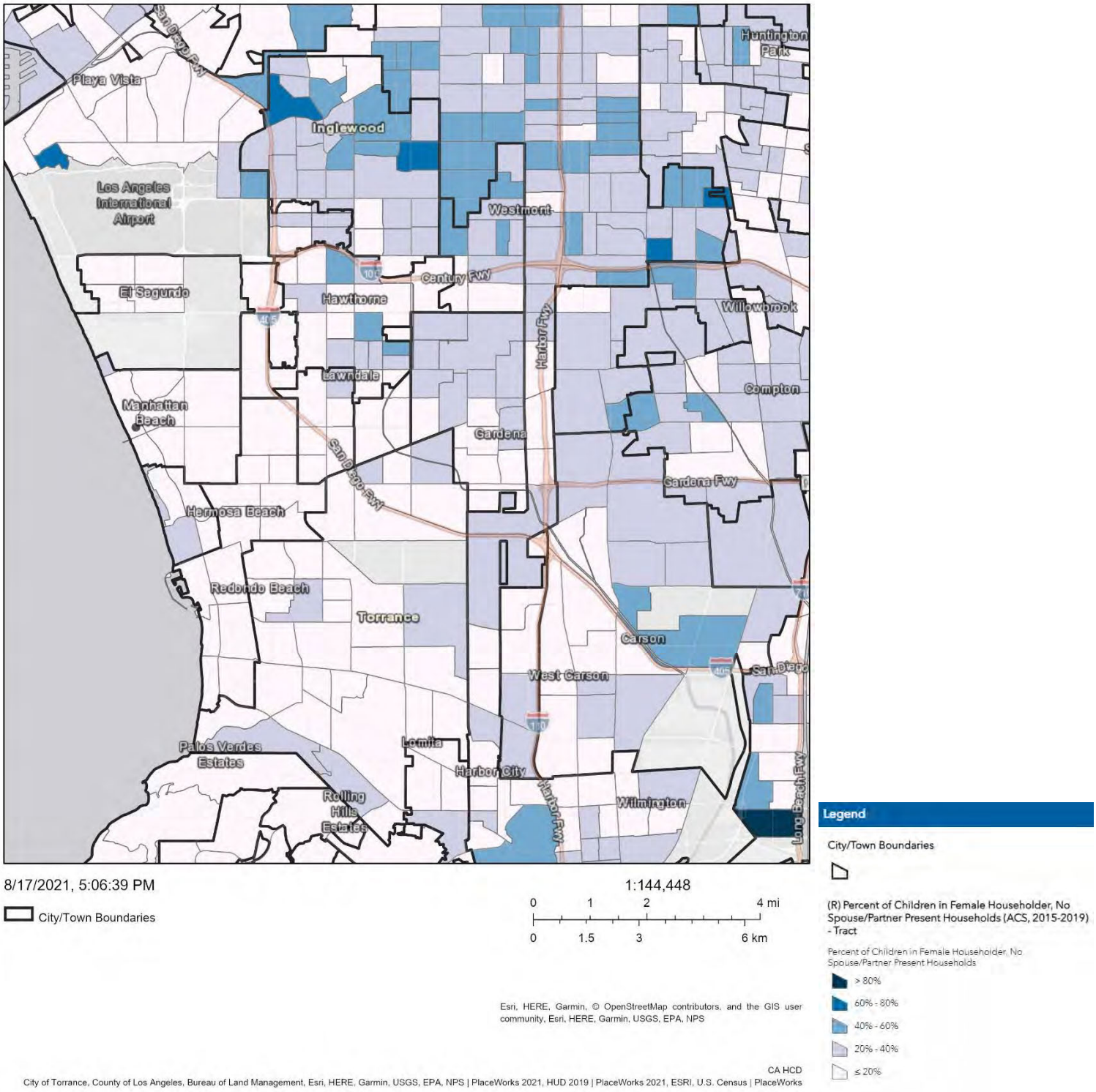


Figure 13. Children in Single-Headed Households

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 14, 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.

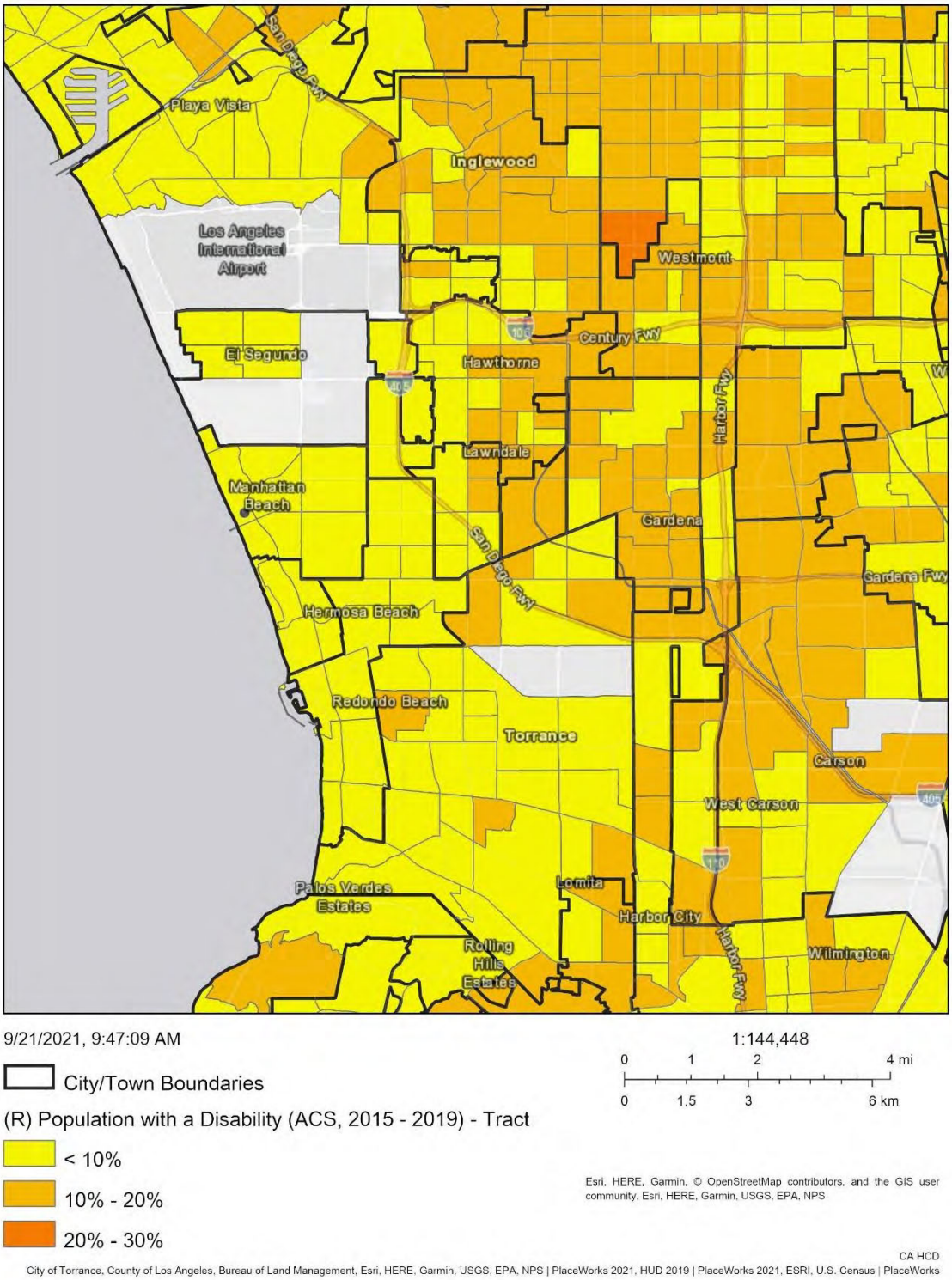


Figure 14. Population with a Disability

4.2.6 Neighborhood Segregation

Typologies in **Figure 15, Neighborhood Segregation**, identify which racial or ethnic groups have more than 10 percent representation within the given tract. **Figure 15** 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,"[9] 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.

[9] "Mix" of races indicates there are three or four racial/ethnic groups that have more than 10 percent representation within the given tract.

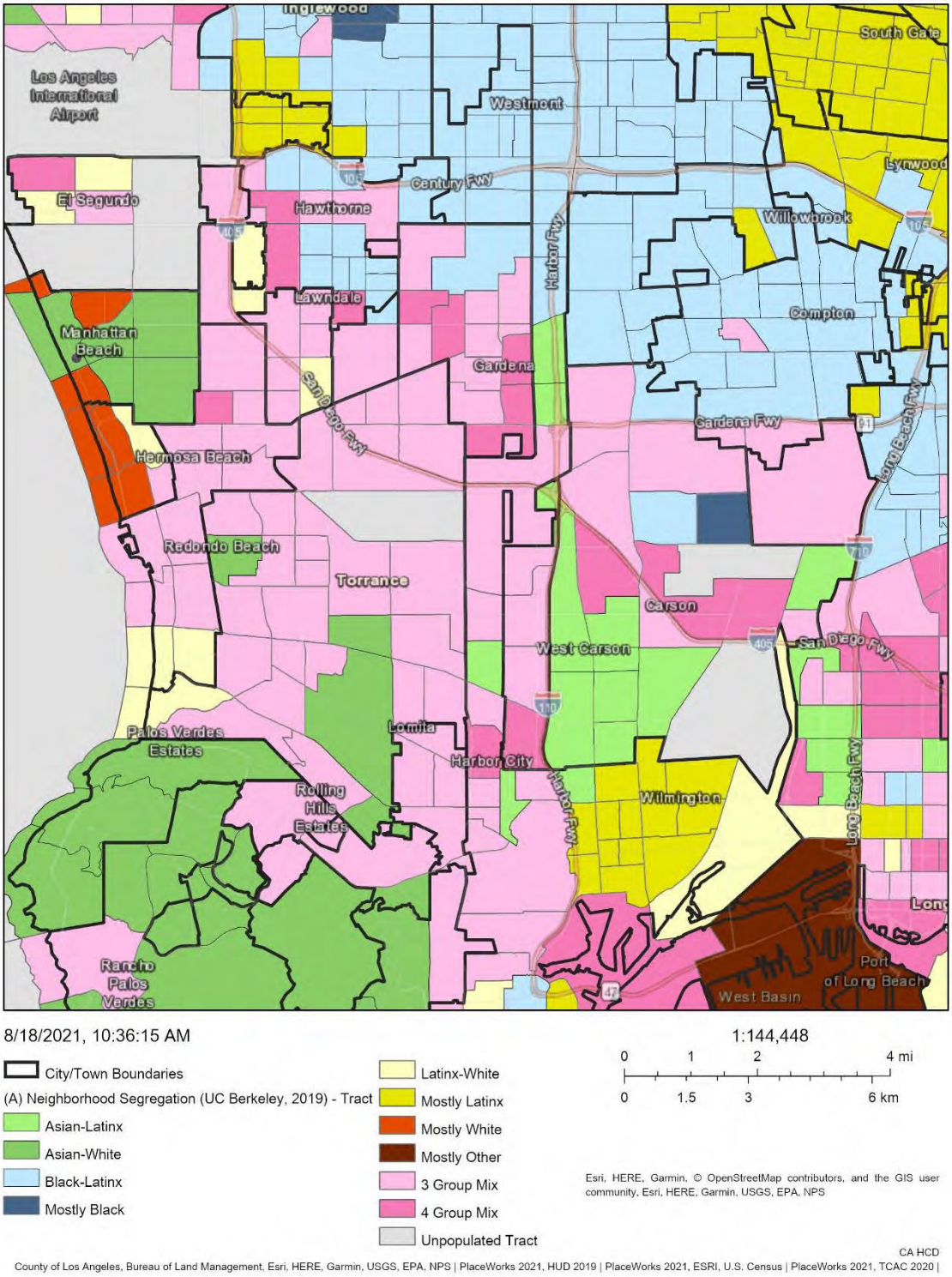


Figure 15. Neighborhood Segregation

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 16, 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.

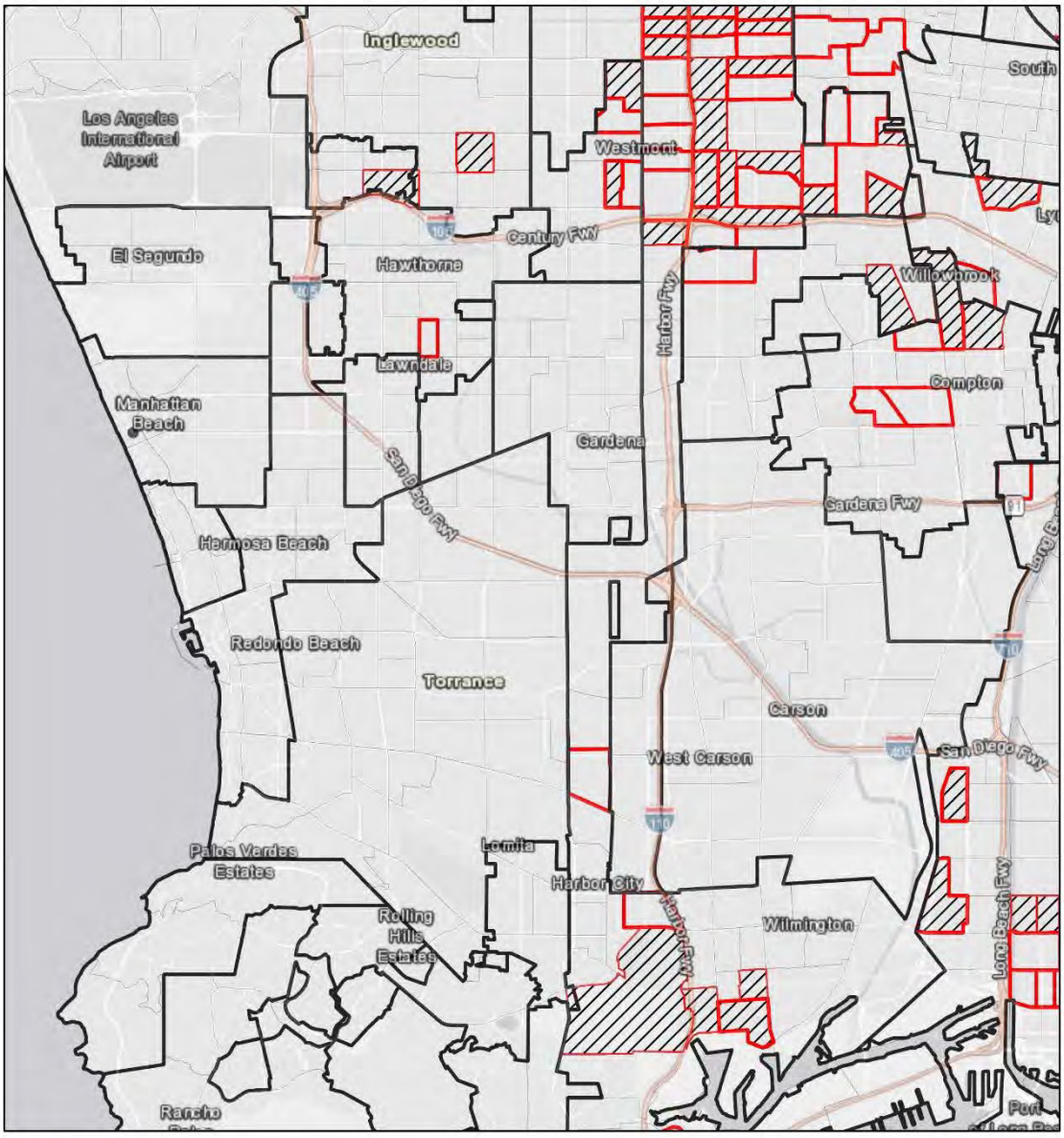


Figure 16. Regional R/ECAPs and High Segregation and Poverty

4.4 Racial Concentrations in Areas of Affluence

In contrast to R/ECAPs, racially concentrated areas of affluence (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 17, 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 Flournoy 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 18, 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.[10] 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.

[10] https://lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.aspx

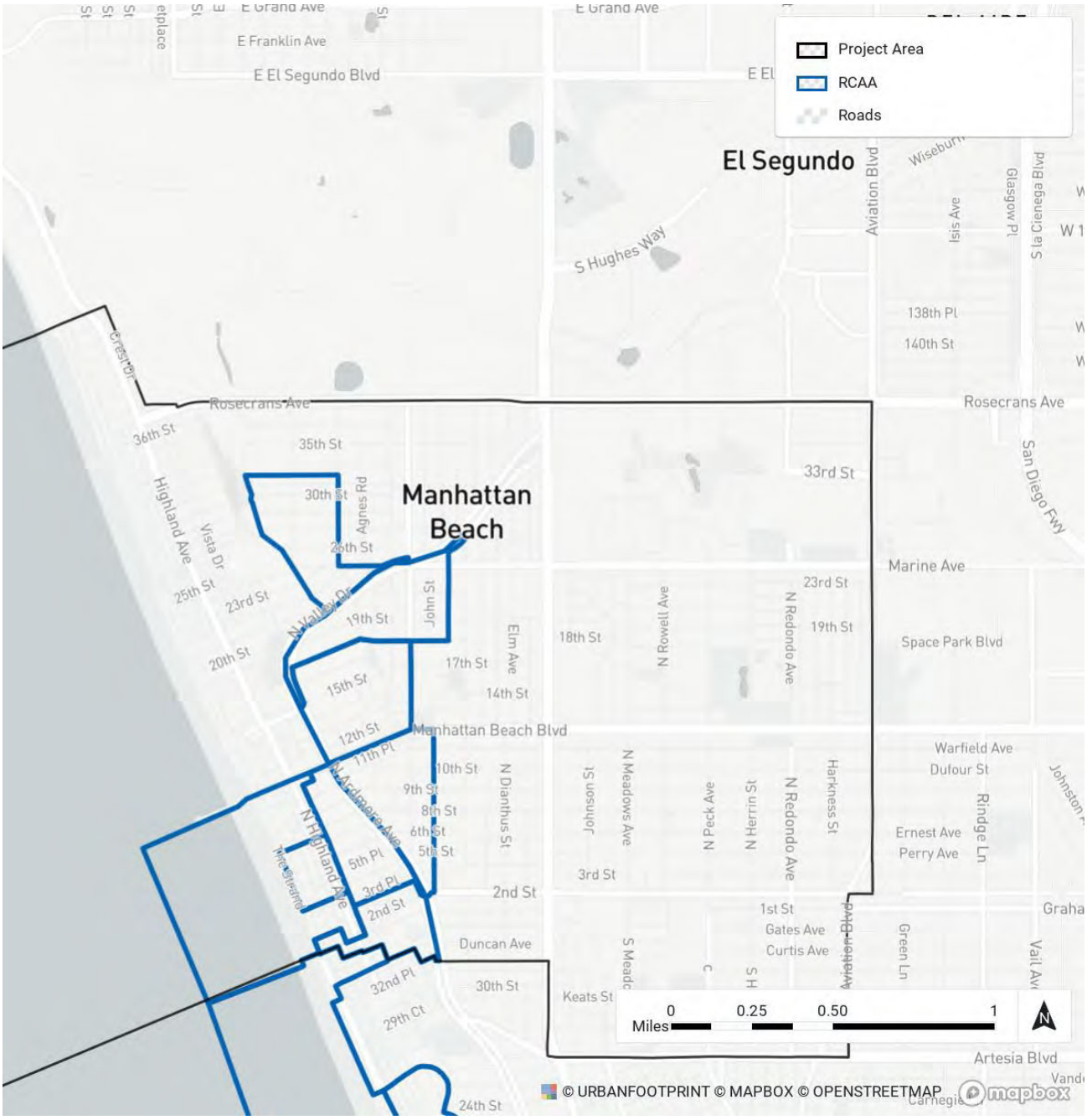


Figure 17. Racially Concentrated Areas of Affluence



Figure 18. 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:[11]

- 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 19, 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.[12] 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 20, 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 19, 1930s Home Owners'**

[11] https://dsl.richmond.edu/panorama/redlining/#loc=5/36.457/-88.242&adview=full&text=intro

[12] 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 9**), and parts of the City are considered to be an RCAA, as identified in **Figures 17 and 18**.

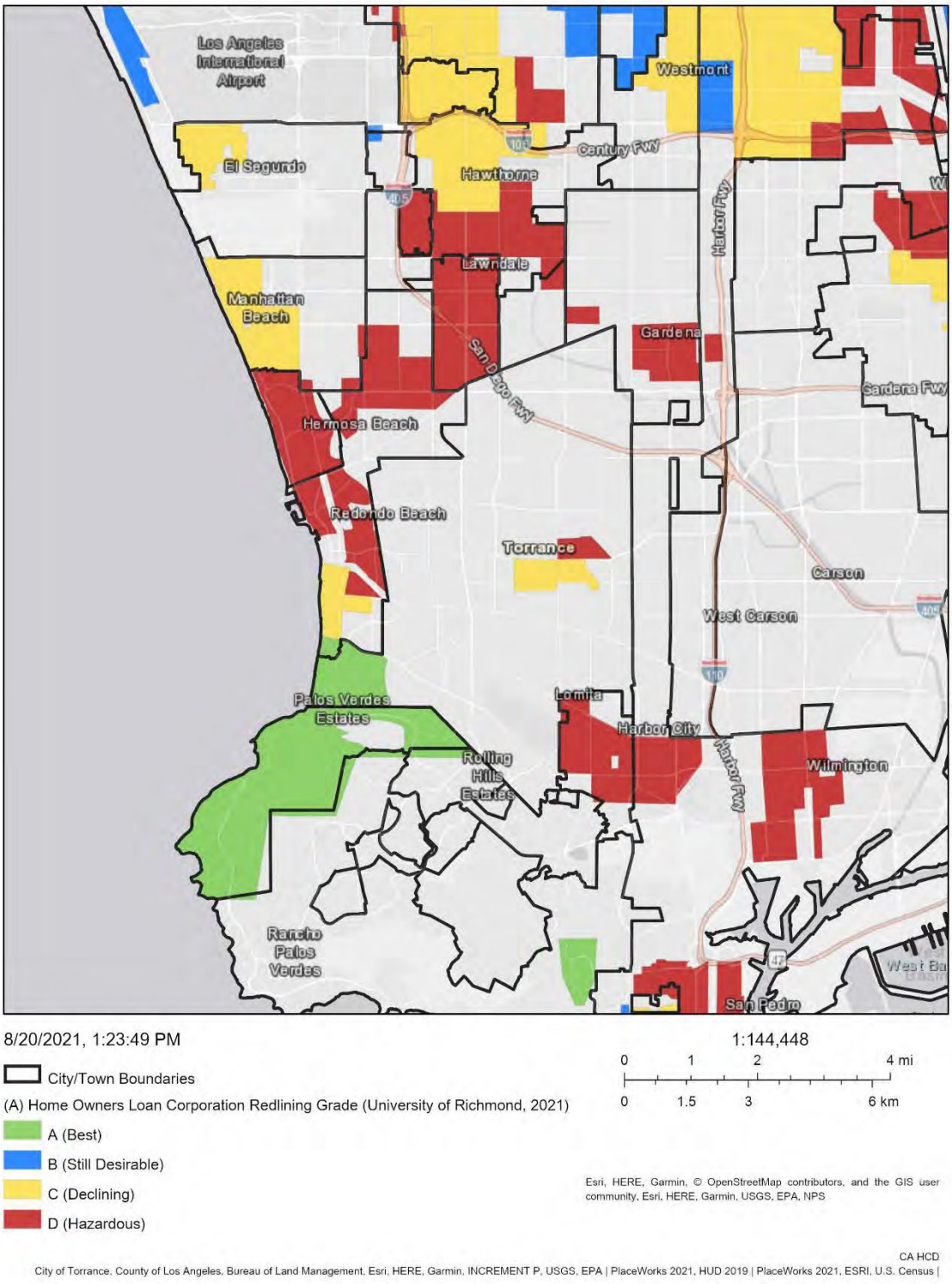


Figure 19. 1930s **Home Owners' Loan Corporation** Map

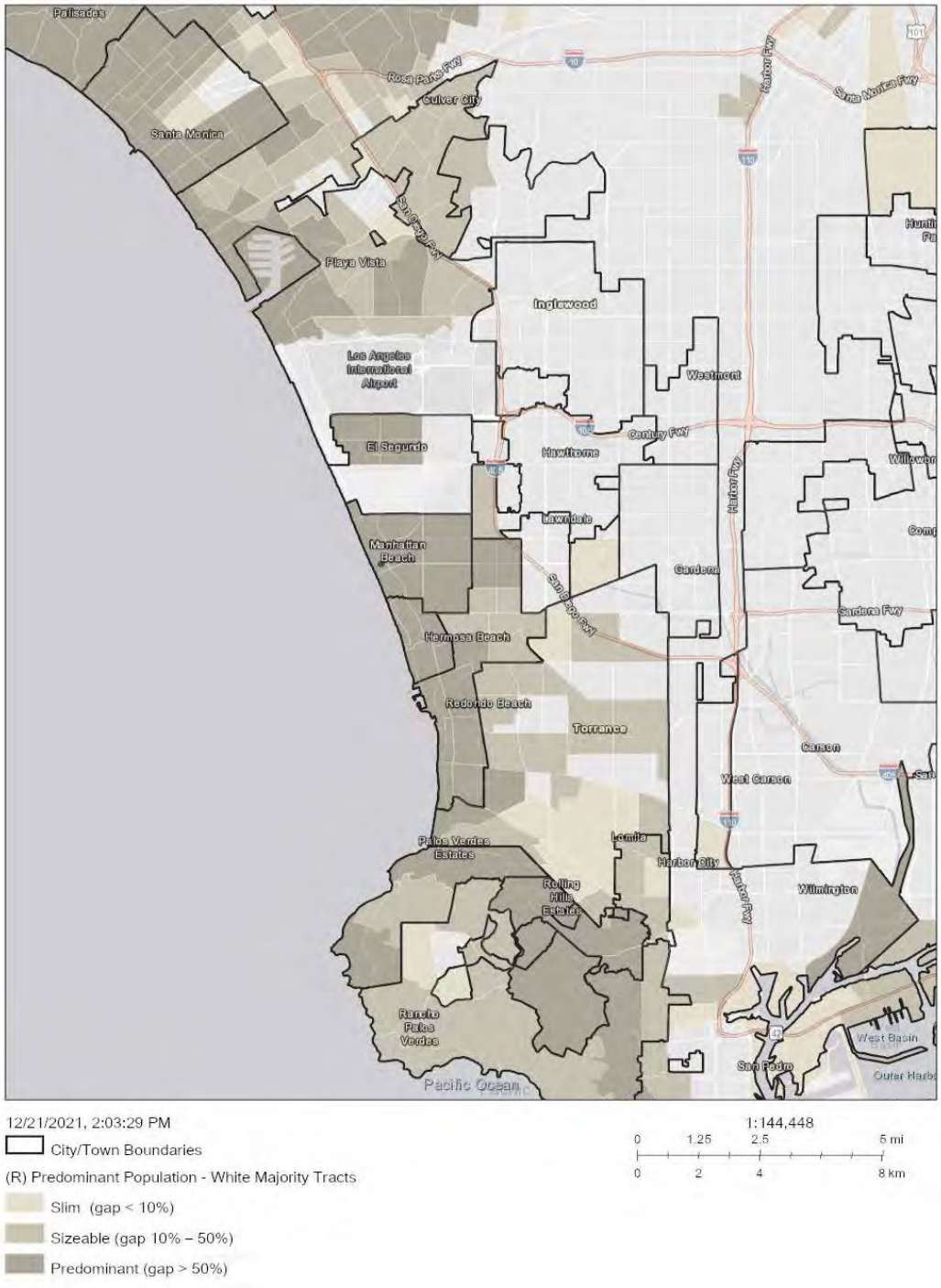


Figure 20. Predominant Population – White Majority Tracts

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 21, 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 22, 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.

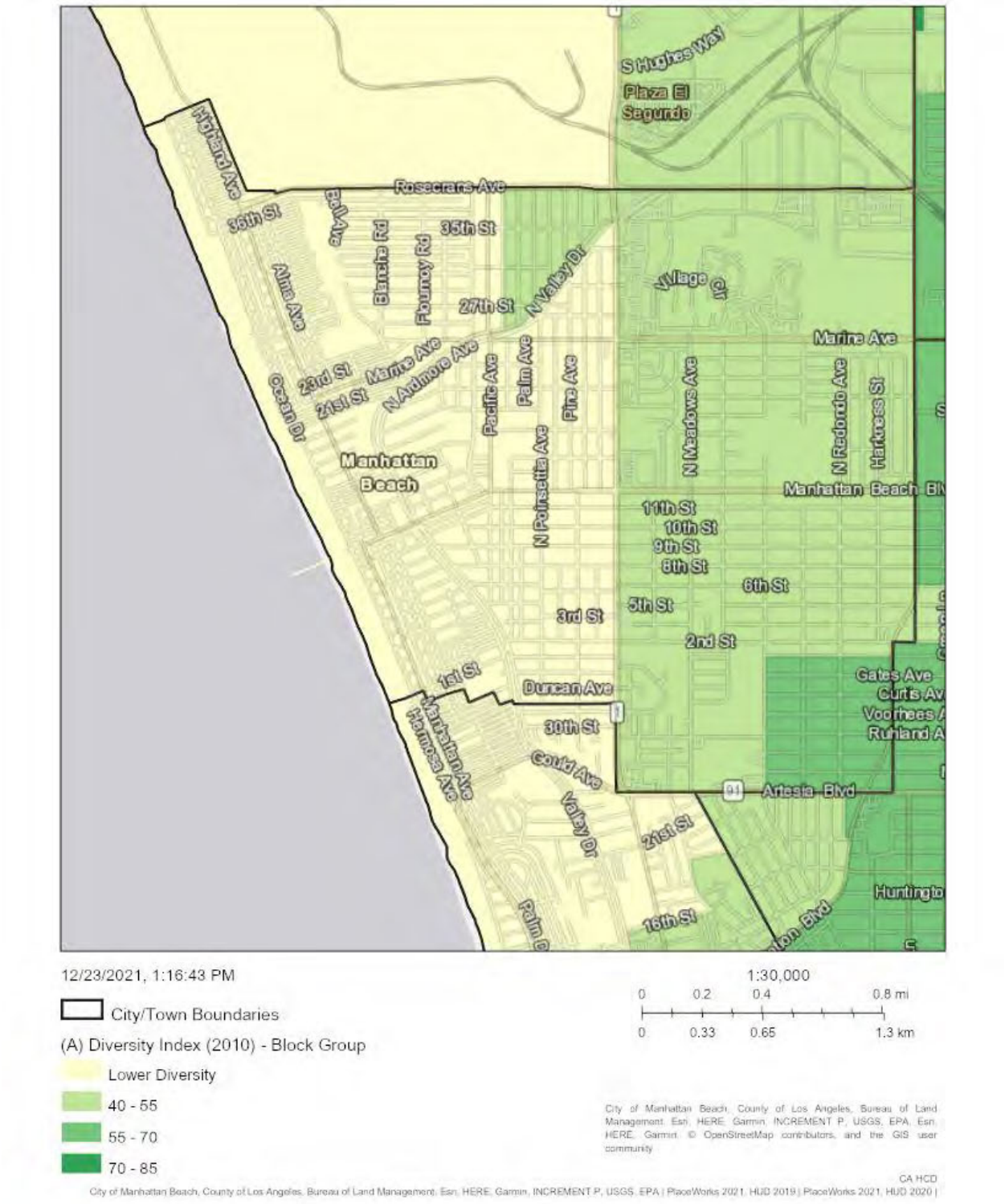


Figure 21. Diversity Index (2010)

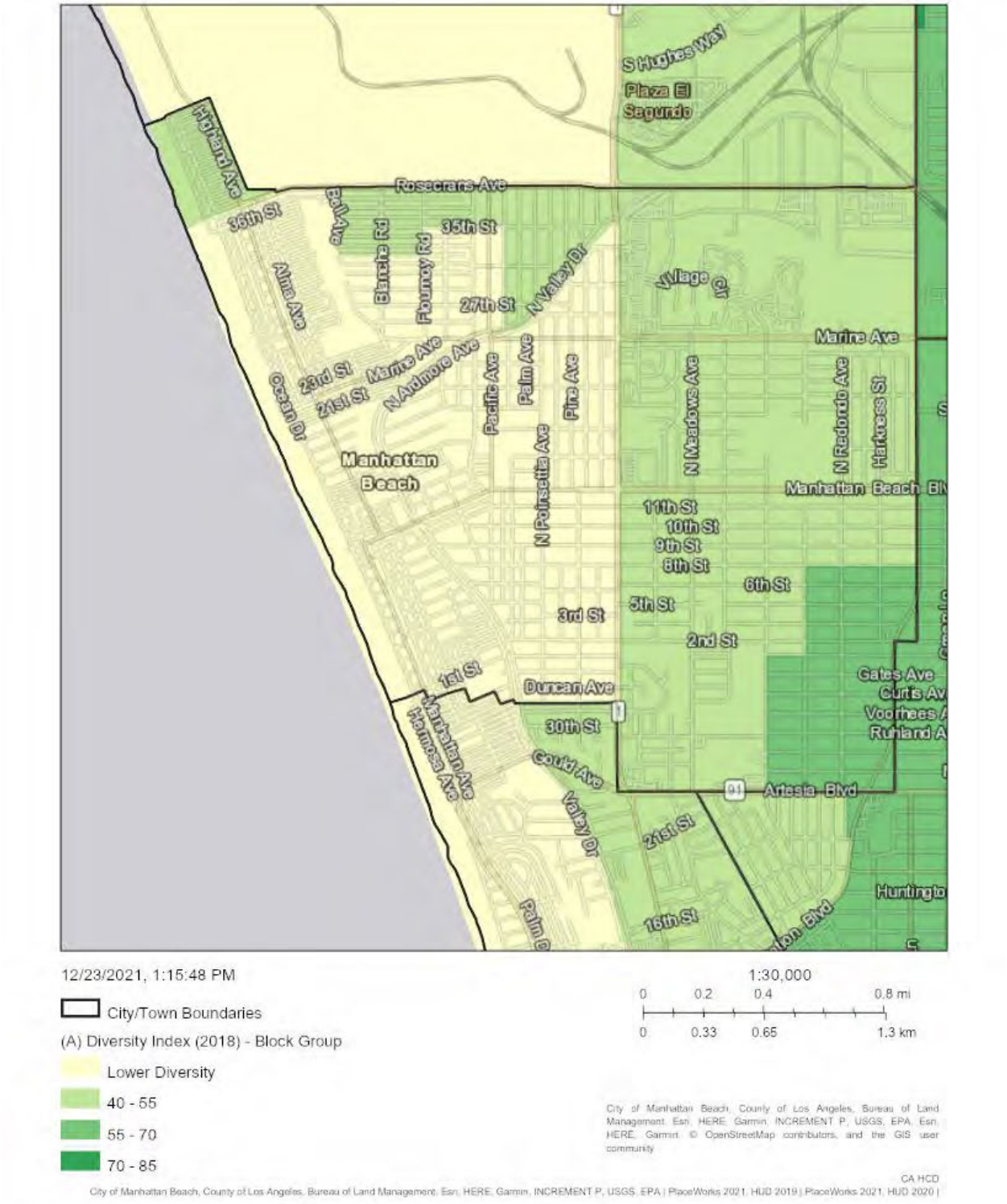


Figure 22. Diversity Index (2018)

4.5.3 Poverty

Figure 23, 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 24, 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.



Figure 23. Poverty Status (2010-2014)



Figure 24. 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.[13]

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.[14] 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 25, 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 25** 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.

[13] https://www.povertylaw.org/wp-content/uploads/2020/06/environmental_justice_report_final-rev2.pdf

[14] 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

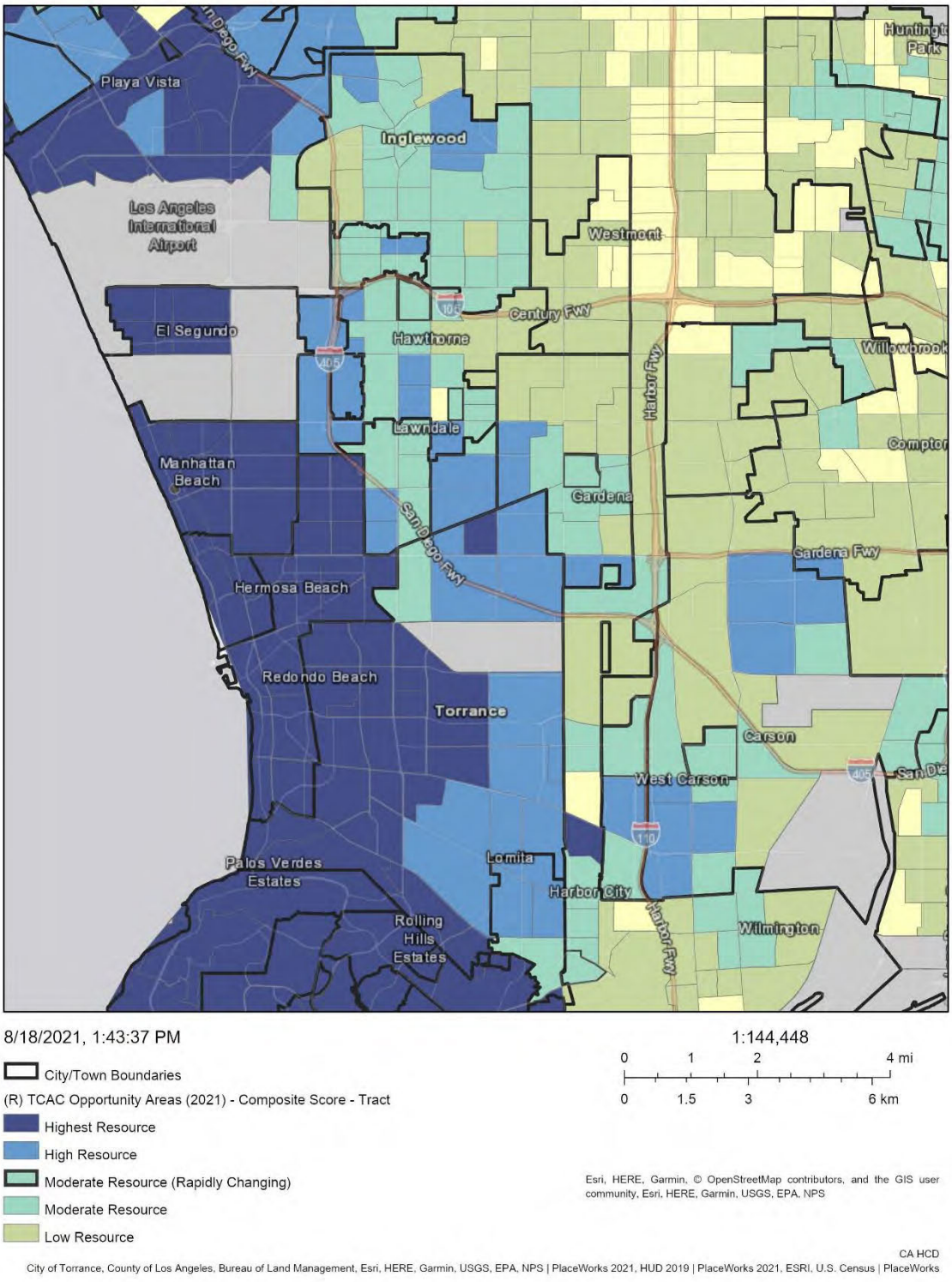


Figure 25. Opportunity Map

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 26, 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 26**, 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.

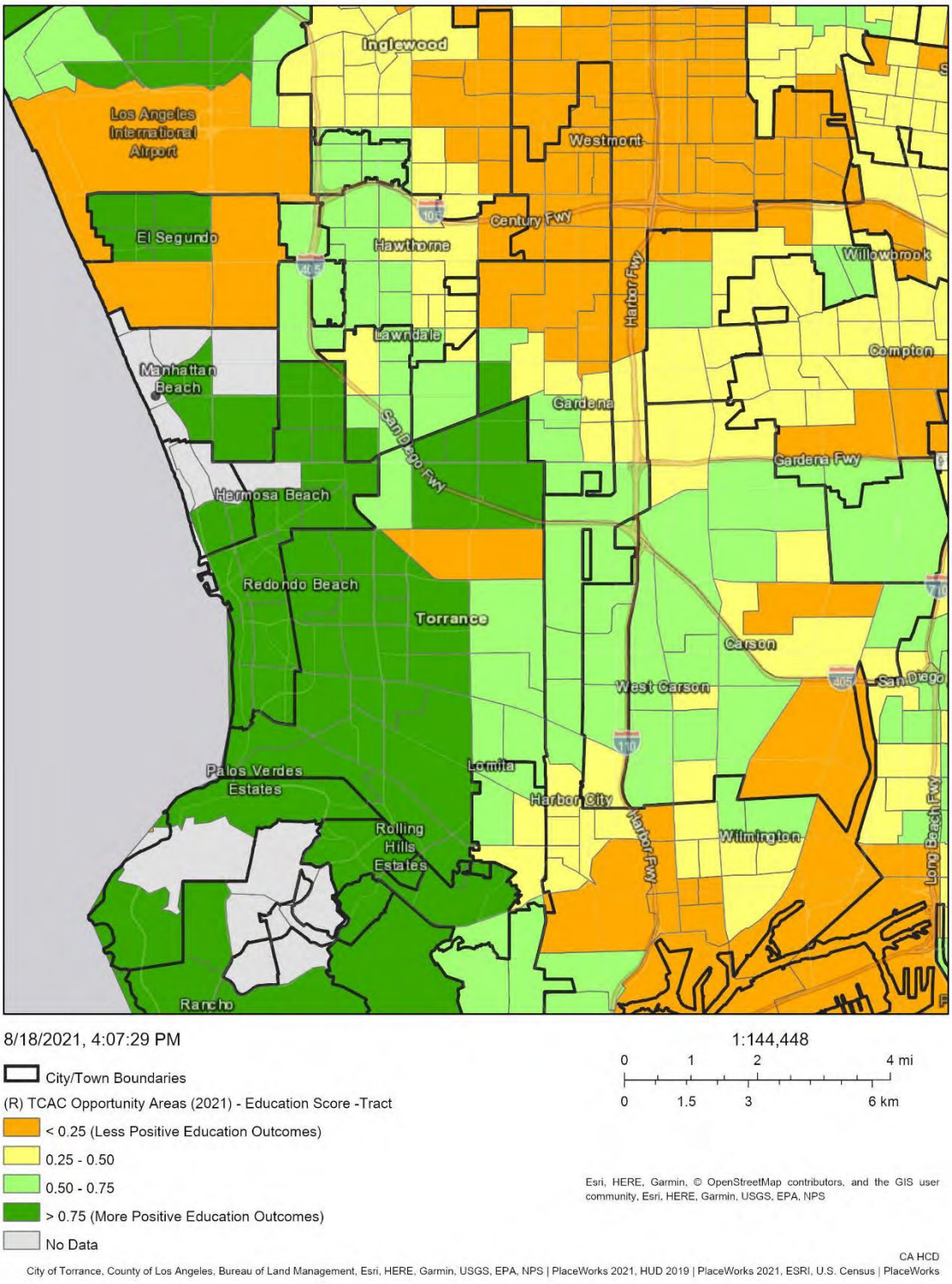


Figure 26. Access to Education

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 27, 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,[15] 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 28, Jobs Proximity**. **Figure 28** 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.[16]

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

[15] "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/.

[16] 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.

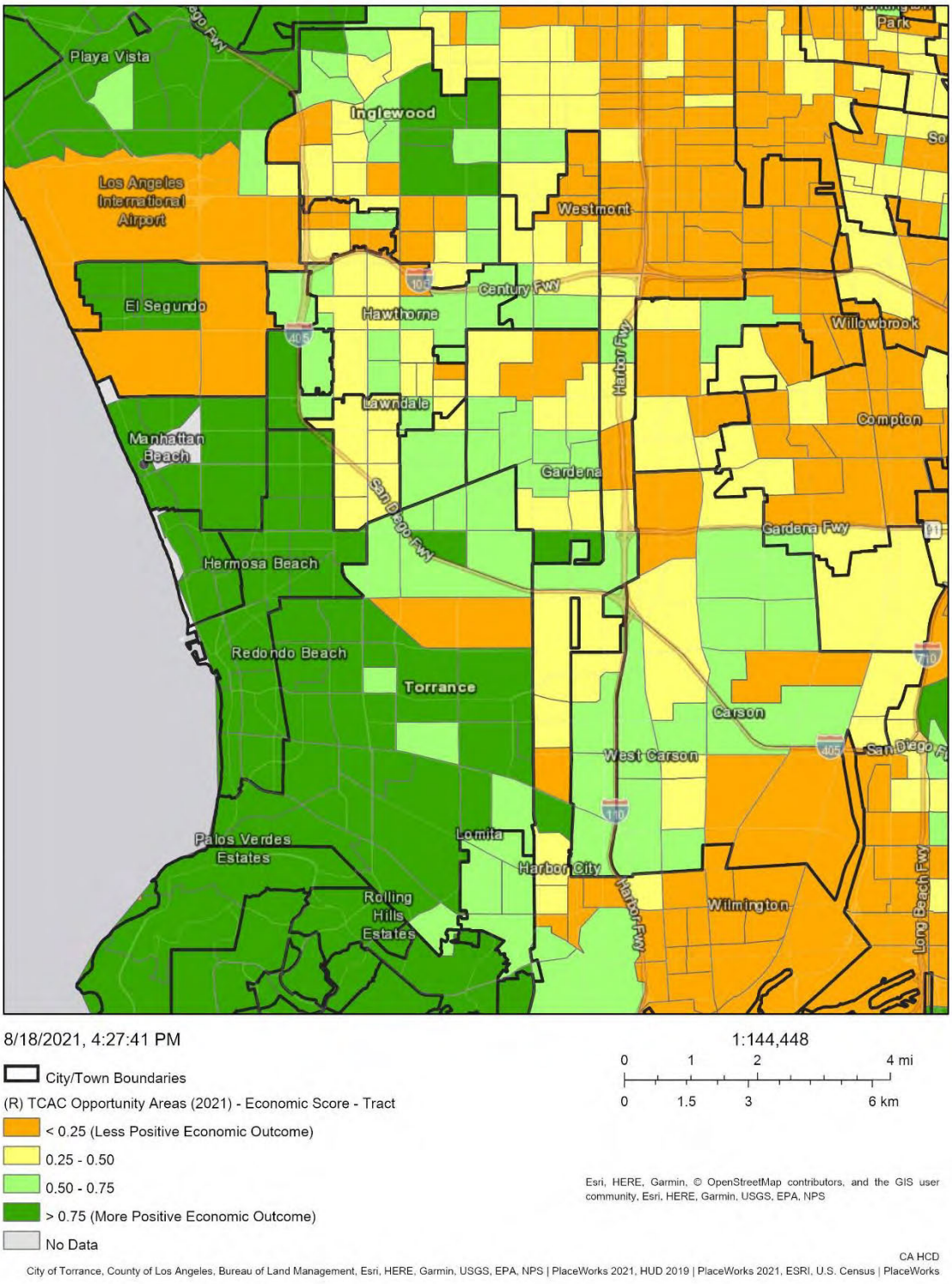


Figure 27. Economic Opportunity

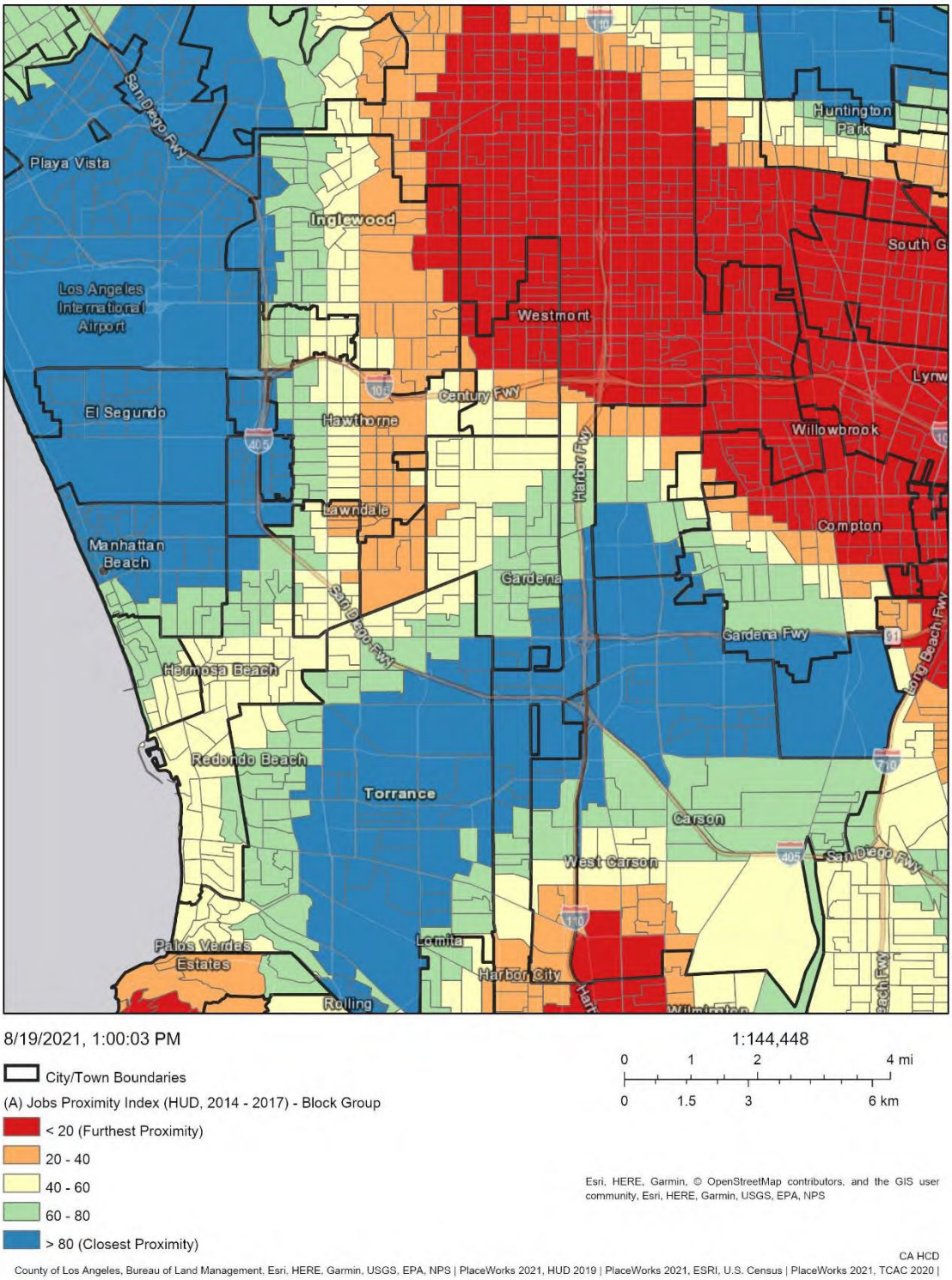


Figure 28. Jobs Proximity

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 29, 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 30, 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.

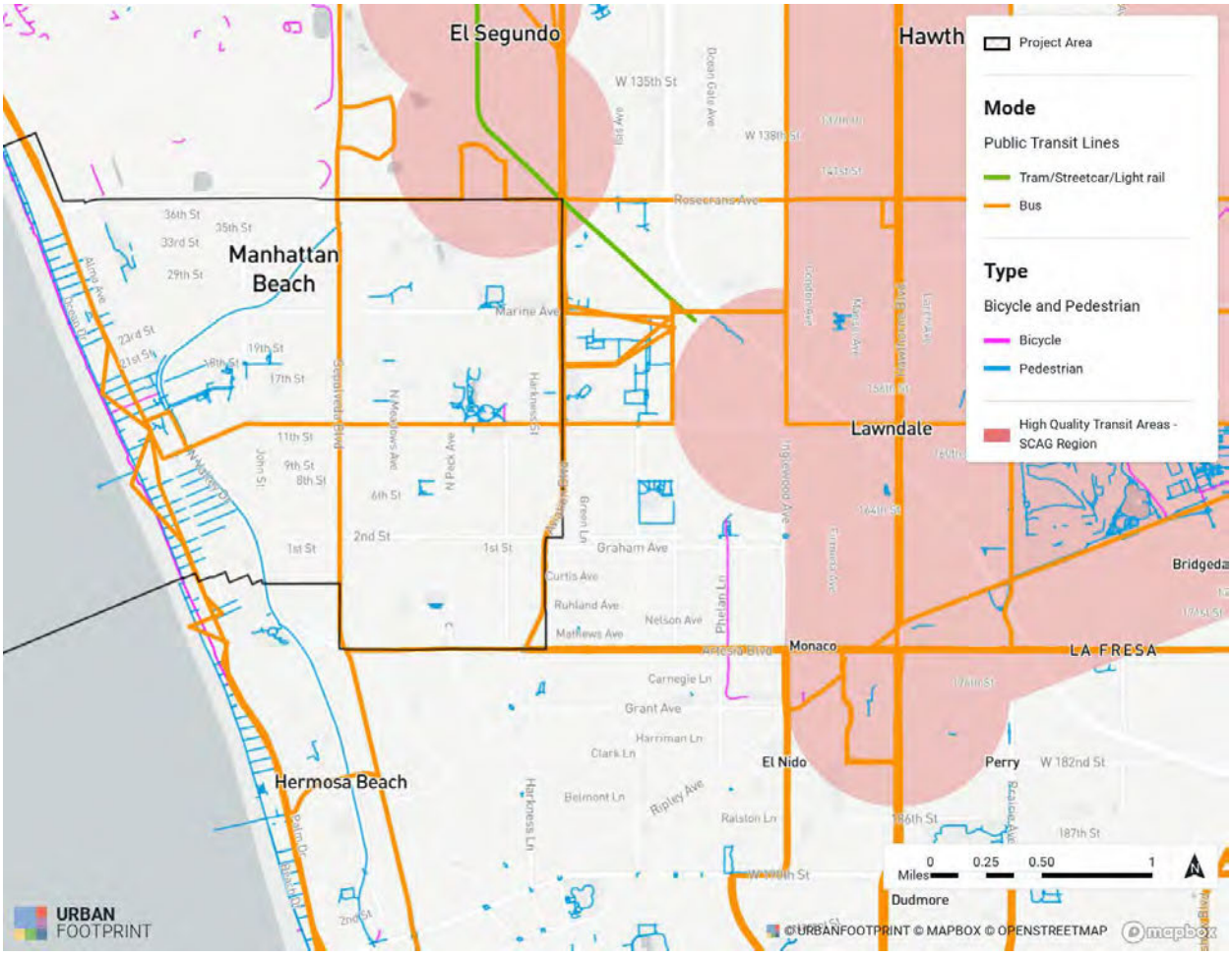


Figure 29. Access to Transportation

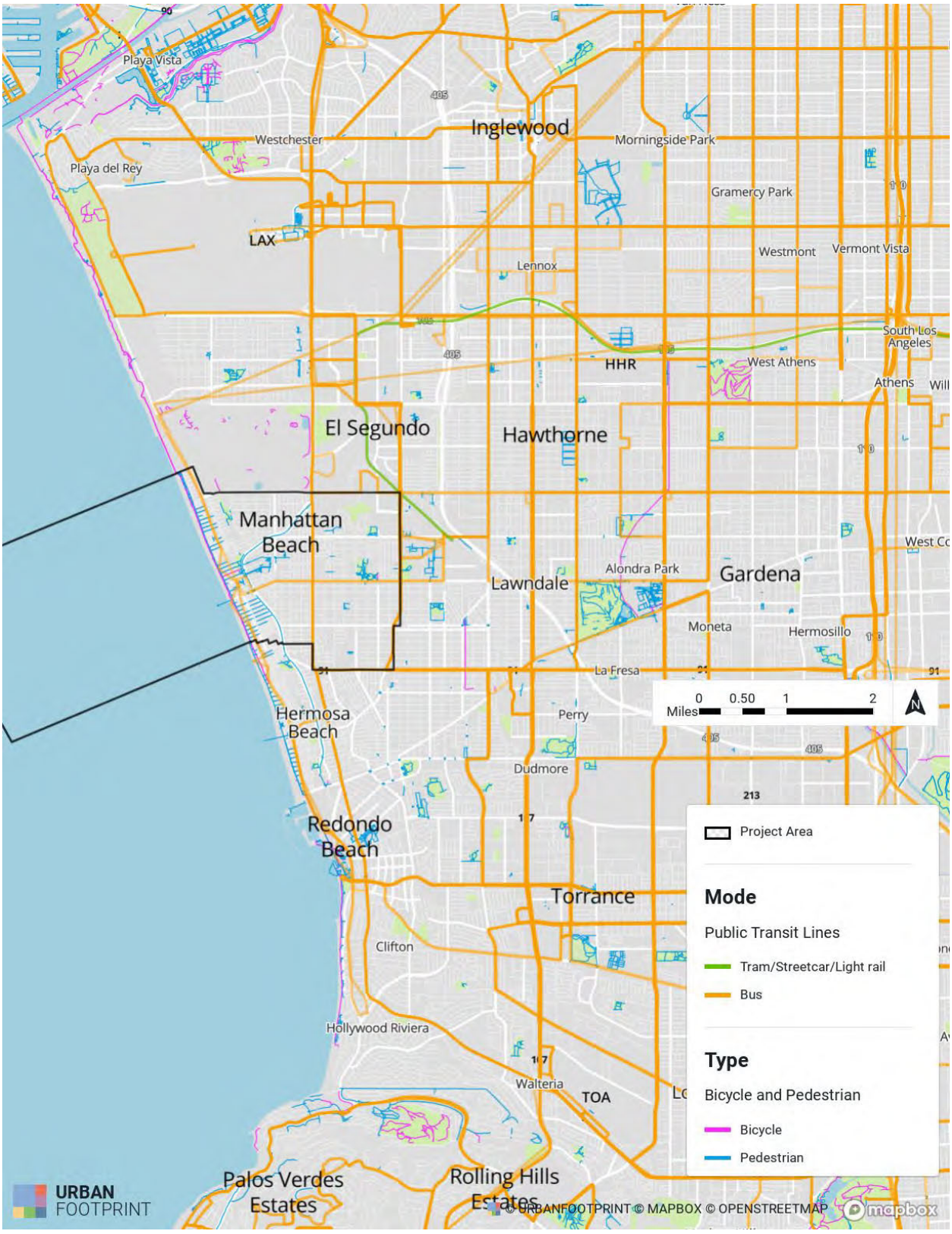


Figure 30. Regional Access to Transportation

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 31, Opportunity for Environment**, shows the opportunity for access to environmentally healthy neighborhoods. As shown in **Figure 31**, 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 28, 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 32, 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.

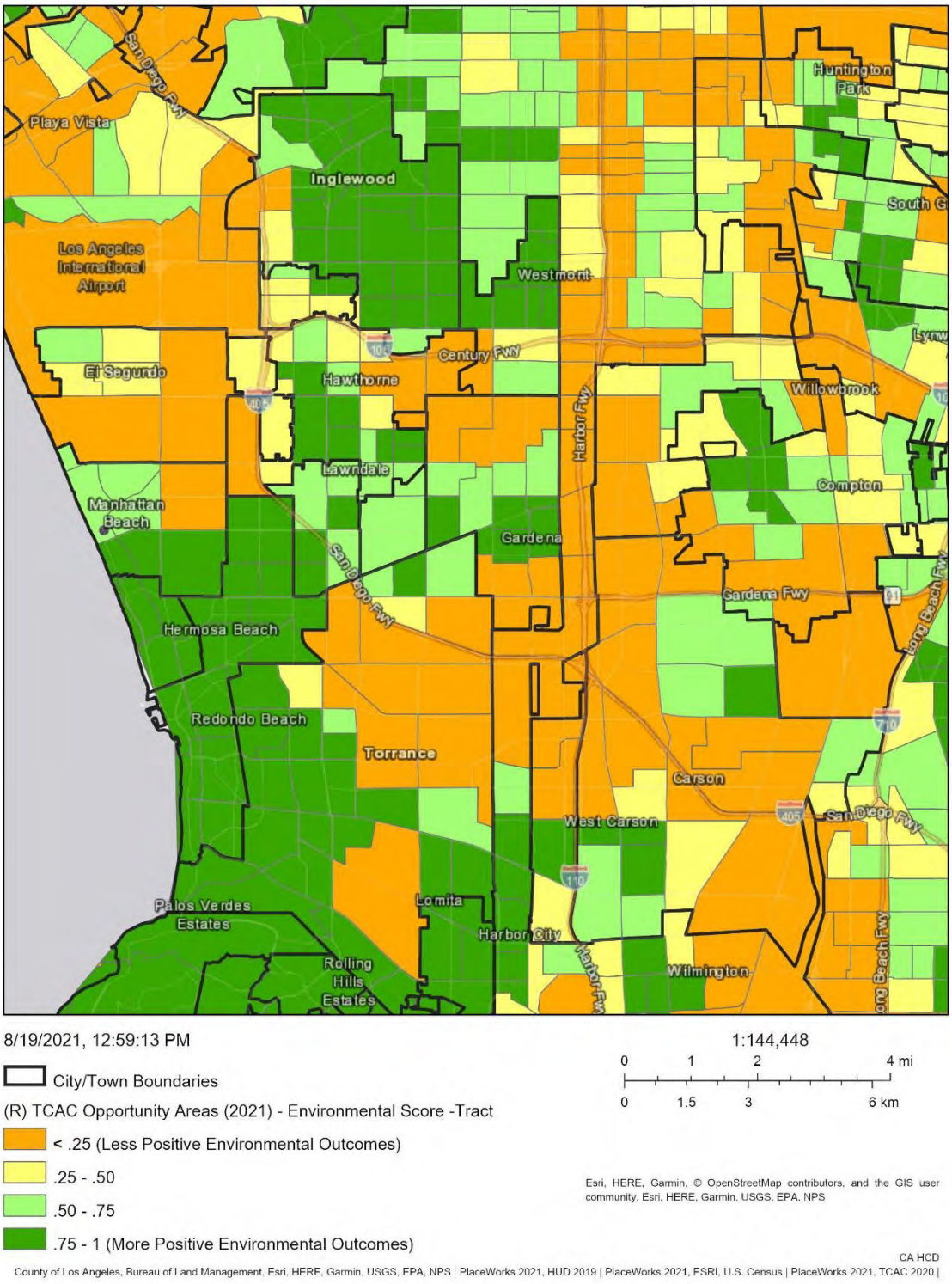


Figure 31. Opportunity for Environment

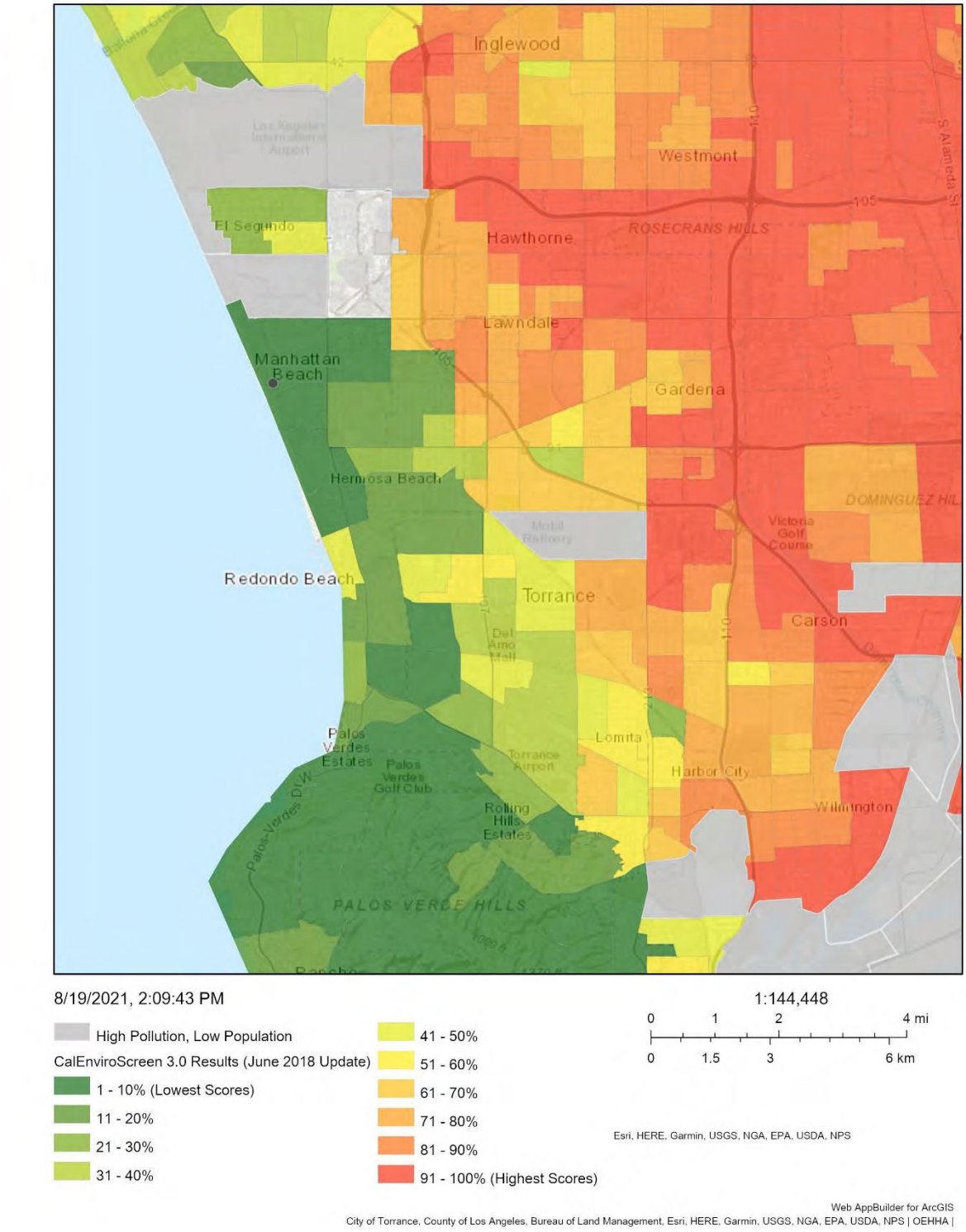


Figure 32. CalEnviroScreen 3.0

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[17]
  - 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

[17] "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 14, 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.[18] 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.[19] Disproportionate housing needs are based on

[18] 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.

[19] "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 33, 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 33 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.

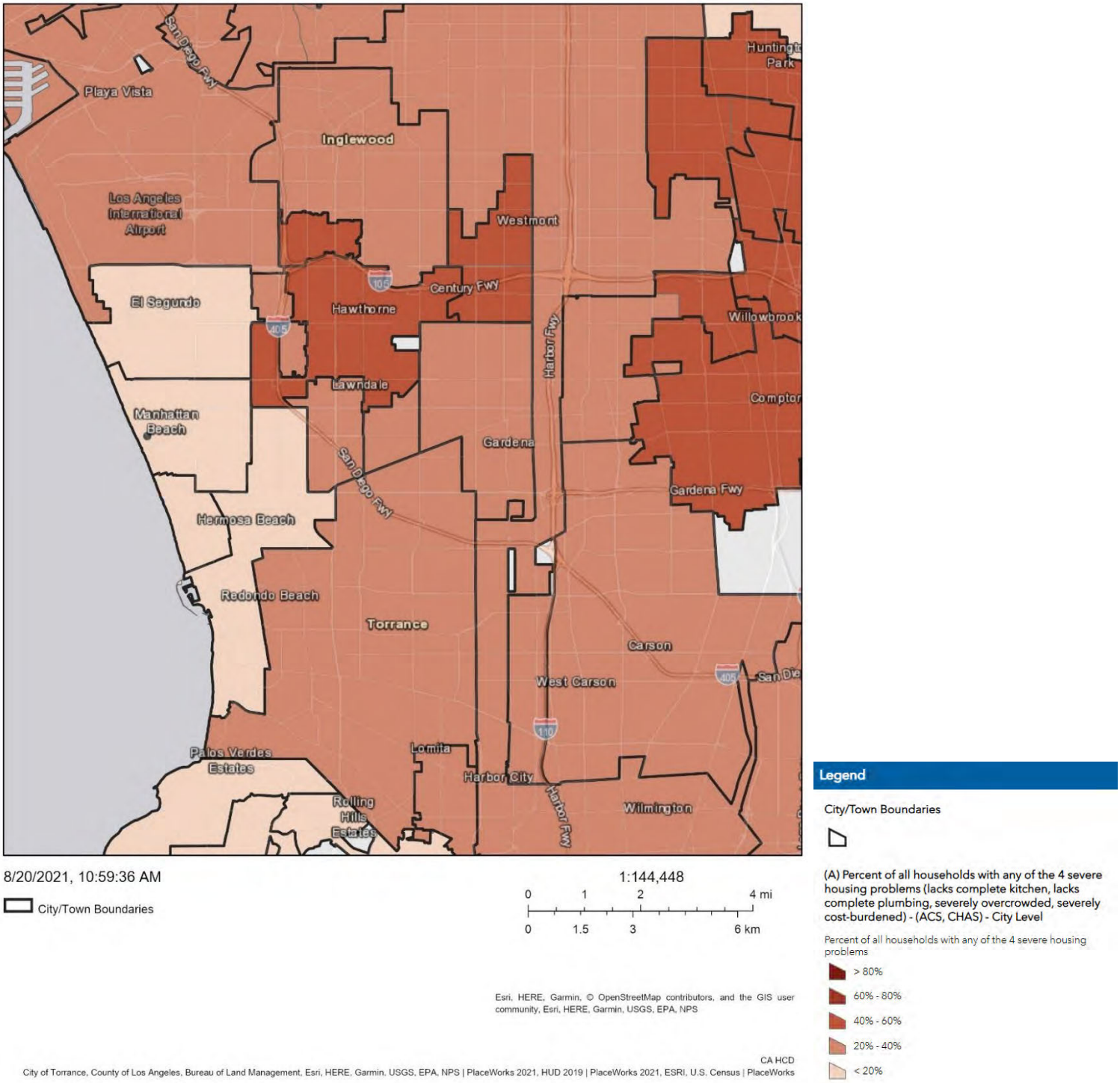


Figure 33. Substandard Housing

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.[20] 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 34, Overcrowding**, and **Figure 35, 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 34**).

[20] https://data.chhs.ca.gov/dataset/housing-crowding

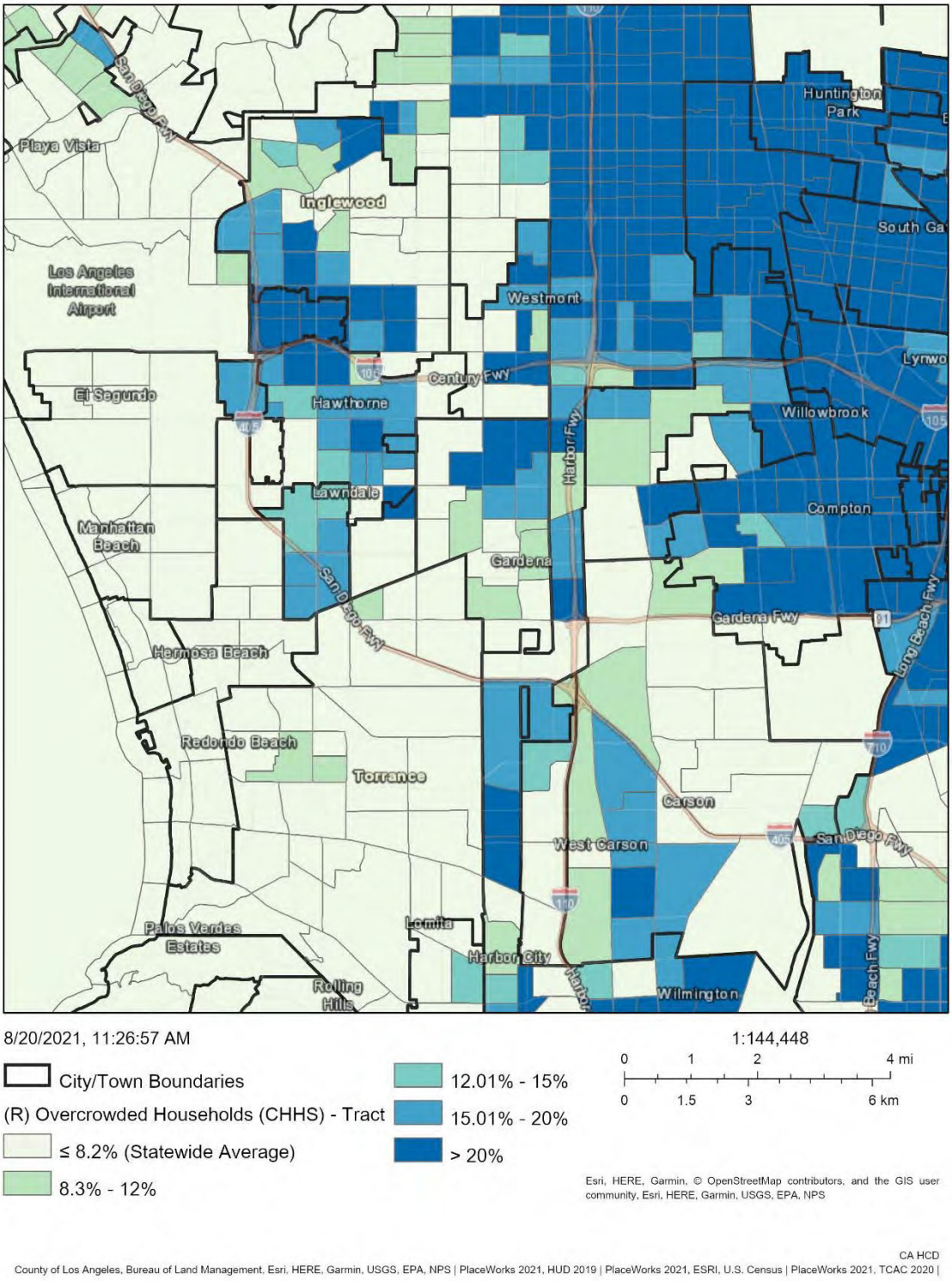


Figure 34. Overcrowding

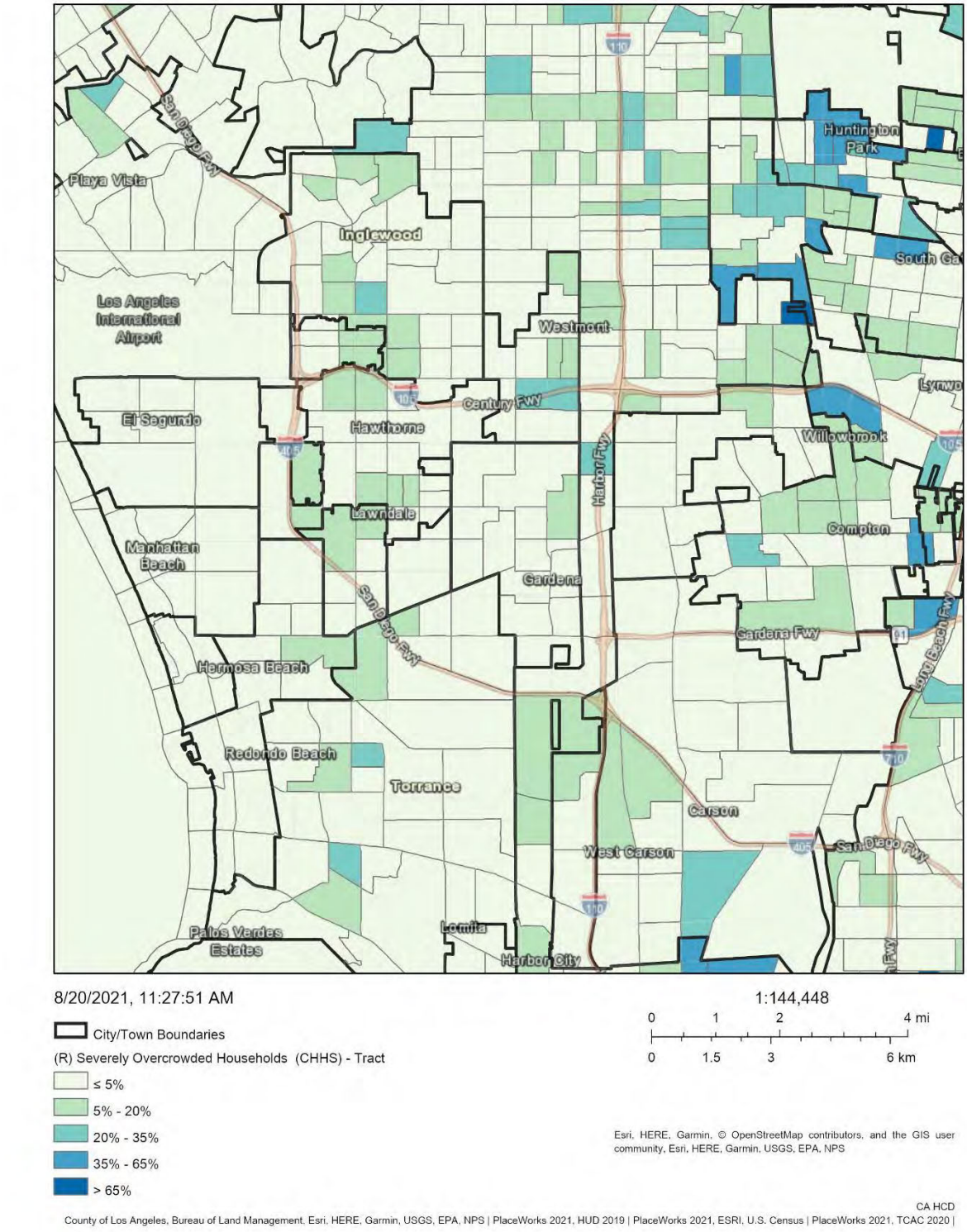


Figure 35. Severe Overcrowding

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.[21] The Fair Market Rent[22] 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 36, 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 37, 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 38, 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 39, Renter Cost Burden (2010-2014)**, renter households who experience overpayment

[21] https://patch.com/california/manhattanbeach/rent-estimates-manhattan-beach-area

[22] 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.

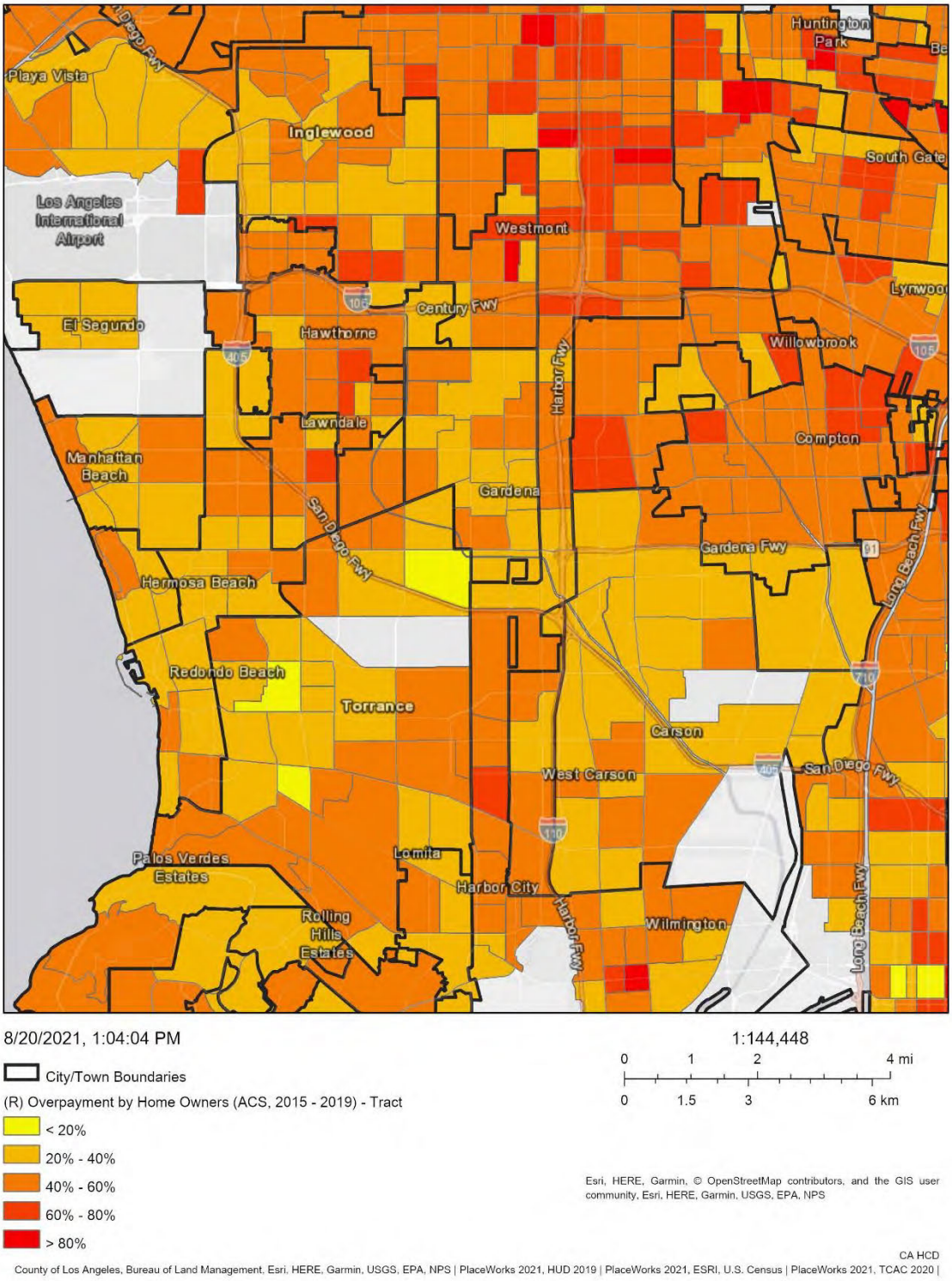


Figure 36. Homeowner Cost Burden (2015-2019)

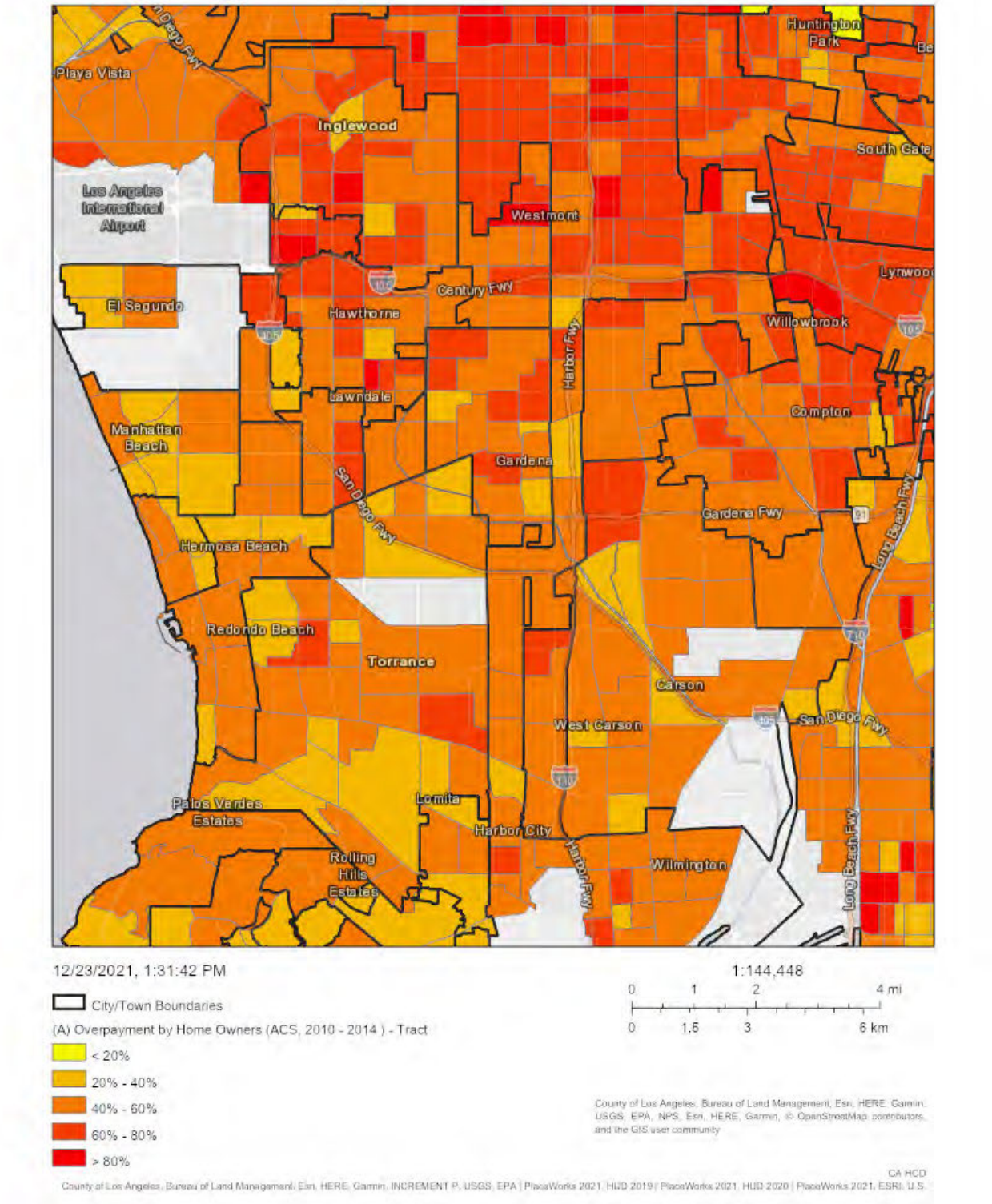


Figure 37. Homeowner Cost Burden (2010-2014)

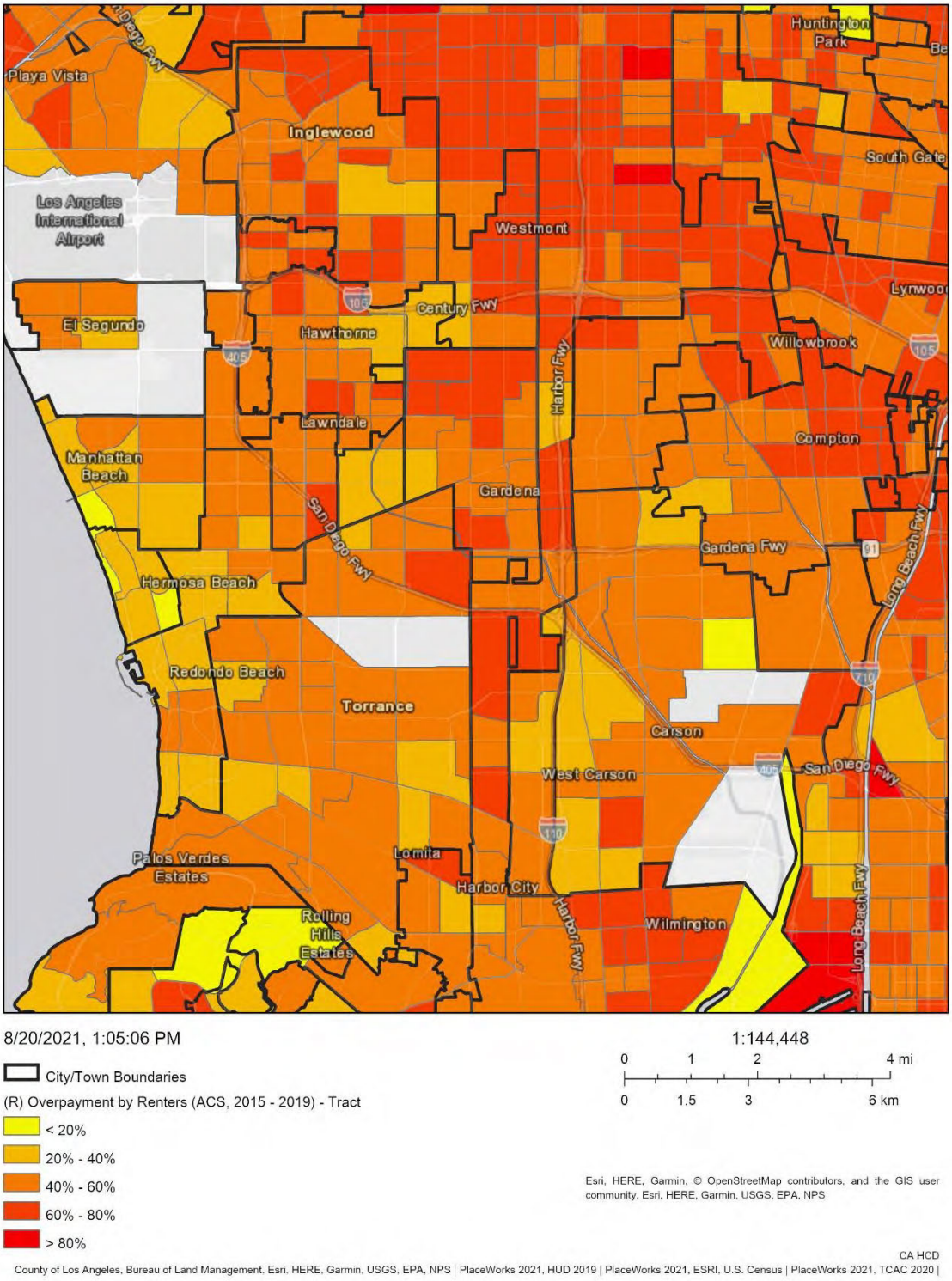


Figure 38. Renter Cost Burden (2015-2019)

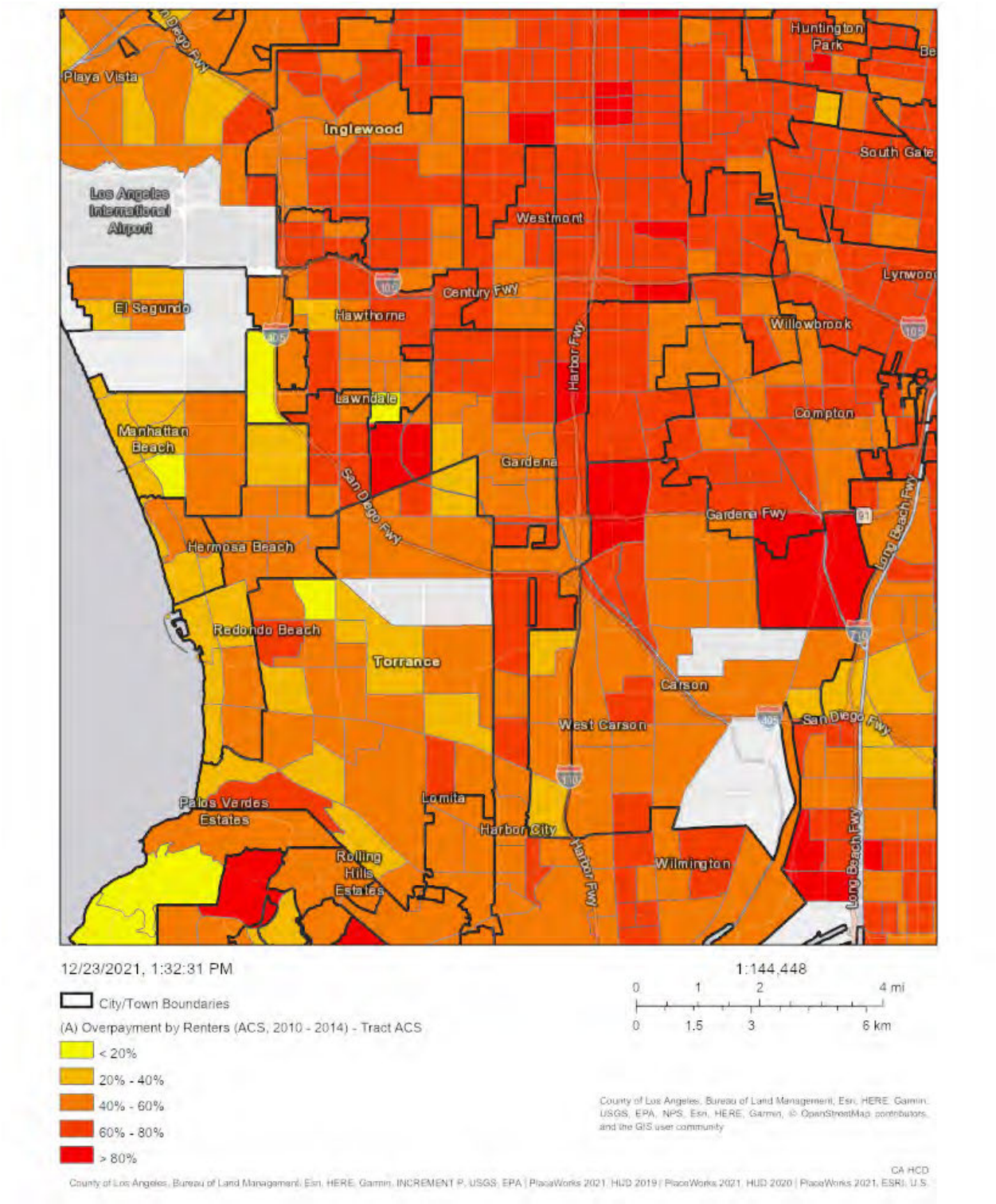


Figure 39. Renter Cost Burden (2010-2014)

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. The population is not vulnerable to displacement driven by investment or disinvestment.

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 40, 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 41, Displacement Typology**.

Disaster-Driven Displacement

As any coastal City is susceptible to sea level rise which may lead to temporary or long-term displacement due to a natural disaster. However, the City is actively taking several preventative sea level rise measures to mitigate the potential for disaster driven displacement of residents. There is no existing lower-income housing nor have there been any sites identified in the Appendix E within the coastal zone. 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).

Through the Climate Ready MB program, the City recently completed Sea Level Rise Risk, Hazards, and Vulnerability Assessment, in which findings indicate that coastal hazards are not expected to directly impact any residences in the city, roads or major infrastructure during the study's planning horizon which extends to the year 2100.

The completed Sea Level Rise Risk, Hazards, and Vulnerability Assessment is informing 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 (see **Program 13, Energy Conservation and Energy Efficiency Opportunities**) the City will develop strategies to increase the community's resilience to climate change impacts and cut carbon emissions.

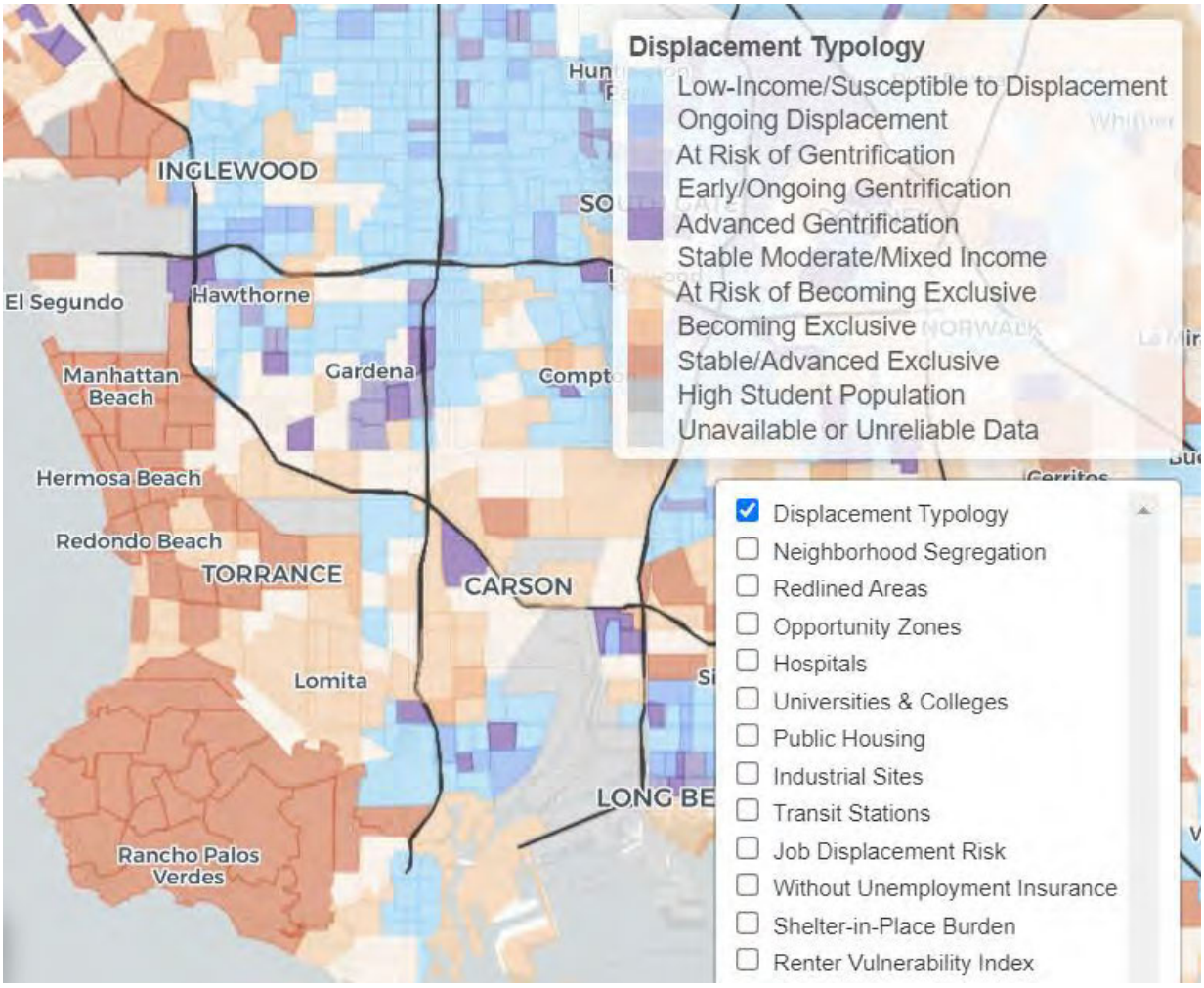


Figure 40. Displacement Map

MODIFIED TYPES	CRITERIA
LOW-INCOME/SUSCEPTIBLE TO DISPLACEMENT	• Low or mixed low-income tract in 2018
ONGOING DISPLACEMENT OF LOW-INCOME HOUSEHOLDS	• Low or mixed low-income tract in 2018 • Absolute loss of low-income households, 2000-2018
AT RISK OF GENTRIFICATION	• Low-income or mixed low-income tract in 2018 • Housing affordable to low or mixed low-income households in 2018 • Didn't gentrify 1990-2000 OR 2000-2018 • Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018 • 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
EARLY/ONGOING GENTRIFICATION	• Low-income or mixed low-income tract in 2018 • Housing affordable to moderate or mixed moderate-income households in 2018 • Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2012-2018 • Gentrified in 1990-2000 or 2000-2018
ADVANCED GENTRIFICATION	• Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs • Gentrified in 1990-2000 or 2000-2018
STABLE MODERATE/MIXED INCOME	• Moderate, mixed moderate, mixed high, or high-income tract in 2018
AT RISK OF BECOMING EXCLUSIVE	• Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Marginal change or increase in housing costs
BECOMING EXCLUSIVE	• Moderate, mixed moderate, mixed high, or high-income tract in 2018 • Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018 • Rapid increase in housing costs • Absolute loss of low-income households, 2000-2018 • Declining low-income in-migration rate, 2012-2018 • Median income higher in 2018 than in 2000
STABLE/ADVANCED EXCLUSIVE	• High-income tract in 2000 and 2018 • Affordable to high or mixed high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs

Figure 41. 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.[23]
- 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.

[23] 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[24] 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

[24] "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 those identified in Program 21, Older Adults Programs which include Dial-a-Ride transportation services, arts and crafts as well as other physical and social clubs through the City's Parks and Recreation Department. 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. Additionally the City has 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 25, 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 6th 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. Through **Program 14, Fair/Equal Housing Program,** the City is committed to provide outreach and education to help the community understand the benefits of multifamily housing and several other fair housing topics as part of the South Bay Sustainable Housing Development Education Program. The program will include a series of educational workshops (Housing Education Forums) to encourage informed discussions regarding residential density and design that support a range of sustainable and affordable housing options and help decision makers, stakeholders and community members understand optimal ways to meet regional housing needs.

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 Assis 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 365 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 accommodate75 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.

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.[1] 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.

[1] 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); MIRTA – 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. Current floor area ratio is calculated dividing the building square by the parcel size and is expressed as a decimal. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt when the current floor area ratio is less than the floor area ratio permitted under the development standards.
- **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
18	152	19	189 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 lower-income sites in residential zones by analyzing:

- Development Trends
- Residential development in commercial zones
- Local knowledge

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).

Development Trends

Table 3, Development Trends, 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. Furthermore, of the recent developments, 2/3 of the projects achieved 100 percent of the maximum capacity. 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 1707 – 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).

Residential Development in Commercial Zones

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). The City has not received any interest or application for 100 percent commercial projects since 2020. As such, a comprehensive review of development trends was also analyzed to capture the potential for nonresidential development to inform the realistic capacity. The aforementioned 1701 – 1707 Artesia, is a recent planned residential multifamily 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; however, staff was notified that the project will be resubmitted shortly as 100 percent residential. As detailed in **Section 5.2, 1701-1707 Artesia**, while the project originally included a commercial component, given the high cost of land and market demands, the commercial component is in the process of being removed and will be resubmitted as 100 percent residential with 14 units in order to remain profitable for the developer. 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. 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 or commercial 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, greatly exceeding the 51.2 dwelling units per acre permitted by the zone, achieving 152 percent of the maximum density.

Local Knowledge

The examples provided coupled with local knowledge of developer interest for residential development in the City support the likelihood of 100 percent residential development in zones that allow for 100 nonresidential development. It should be noted that only one lower-income site is identified in a in zone that allows for nonresidential uses identified **Table 7, Lower-Income Sites**.

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 two sites adequate for lower-income capacity. Only of the sites identified in Table 7 (Table ID 1 is located in a commercial zone, CL Area District I, which permits a maximum capacity of 43.6 dwelling units per acre (see Section 4.1 for site details). A realistic capacity of 20 dwelling units per acre is approximately 45.8 percent of the maximum density allowed in the CL and RH zone, Area District I (Table ID 1 and 2). Given the high cost of land, most developers are motivated to achieve the maximum height and densities permitted on the typical small lots in the City, therefore, a realistic capacity of 20 dwelling units is a conservation approach and provides a generous buffer of the number of units calculated toward the lower-income RHNA. Additionally, the site identified as Table ID 1has previously identified as a non-vacant site in the 5th Cycle Housing Element and is 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. The two sites identified in Table 7 (Table ID 1 and 2) total 18 units at a realistic capacity of 20 du per acre not including additional capacity and density they may achieve through the maximum permitted density of 43.6 du per acre and the aforementioned incentives which go above and 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.

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 units achieving at least 117 percent of the maximum capacity, planned development and developer interest in response to market demand for residential development including in mixed-use zones which allow for 100 nonresidential development, 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				
	Maximum Density (units per acre)		Realistic Density (units per acre)	
Area District	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, as demonstrated in Appendix C, Constraints and Zoning Analysis – 2.1.3

Development Standards, most developers use the maximum density allowed to increase their return on investment and maximize development potential. The realistic capacity at 80 percent of the maximum capacity is also supported by recent development trends it indicates that developers are using City incentives to increase their density maximums above what is permitted in the base zone. 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 and did not include a commercial component as market trends and local knowledge from developer inquiries and current planned development projects in the City indicate there is a strong interest for developing 100 percent residential in order for the project to be financially feasible. 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 (2/3 of which achieved at least 100 percent of the maximum), 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.

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)*
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 18 units on 2 sites. There are no vacant parcels available in the City that can accommodate lower-income units. As such, with a complete deficiency of vacant land in the City, the City must rely on non-vacant sites for lower-income capacity, as an alternative to rely on vacant land simply does not exist. Furthermore, the lack of vacant land 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. A thorough processes overview of the methodology for selection non-vacant sites identified in the Sites Inventory is 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.

Challenge #1 – Parcel Size

As previously mentioned, although the City has five zones that permit a minimum of 30 dwelling units per acre, the median parcel size of land zoned to accommodate residential uses is approximately 0.06 acres. The small parcel size creates a second challenge which is to identify enough contiguous parcels that are identified as underutilized and have existing uses that are not considered an impediment to redevelopment, further detailed below.

Challenge #2 – Contiguous Underutilized Parcels for Consolidation

As the median parcel sizes are very small, to achieve a 0.5-acre site size, assuming the median size of0.06, over 8 parcels which meet the underutilized sites criteria would need to be consolidated to meet the acreage requirements. 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, with different ownership, 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 two sites identified do not meet HCD's minimum acreage criteria and are just under 0.5 acres (see **Table 7**) at 0.49 and 0.46 acres, 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, a lot much smaller than has been identified to accommodate the lower-income units identified in Table 7 which are just under the 0.5 acres threshold. Through market trends, as demonstrated in Appendix C, Constraints and Zoning Analysis – 2.1.3 Development Standards, developers use the maximum density allowed to maximize development potential given the high cost of land and small parcel size. Through this analysis and development 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 that the realistic capacity of 20 dwelling units per acre given the median parcel size in the City and high cost of land as developers will use the maximum density allowed to increase their return on investment and maximize development potential. 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 sites inventory only identified two sites with existing capacity to accommodate lower-income units for a total of 18 units at a realistic capacity. One of the sites includes the consolidation of two parcels, therefore, the analysis also considers the likelihood that this site can realistically be consolidated (Table ID 1). 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.

Solution #1 – Incentivizing Consolidation

In response to the challenge #1 and #2 discussed above, 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

The City relies on non-vacant sites for lower-income capacity, as an alternative to rely on vacant land simply does not exist. Furthermore, the lack of vacant land is not something that the City can directly control. Therefore, in selecting sites to accommodate lower-income units, the City was limited to identifying sites that were underutilized per HCD criteria and methodology identified in Section 3. The

City identified two sites as having the capacity to accommodate lower-income housing 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 this 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 two 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. Only one of the sites includes two parcels with the realistic potential for consolidation: site identified as Table ID 1. 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 the site identified as Table ID 1 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 and Non-Vacant 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. Only one site (Table ID 1) is located in a zone that allows for 100 percent nonresidential development. The City has not received any interest or applications for 100 percent commercial projects since 2020. Additionally, feasibility of this site is supported by recent development trends as discussed in the realistic capacity analysis for lower-income units in Section 3.3 as findings indicate that there is strong developer and market demand for residential only development. And although two planned development projects are located in mixed use zones that allow for 100 percent residential, both are only including a residential component as the applicants have expressed the need to exclude any commercial components as the development would not be financially feasible. Again, the realistic capacity also considers the development on residential properties on commercially zoned parcels by greatly underestimating the maximum development potential.

Many of the parcels were also 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 two 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, and net new units based on the maximum capacity allowed on the site which could be increased if the applicant qualifies for the State density bonus and additional incentives offered by the City through the Programs in the Housing Element and current efforts to incentivize development.

Table 7. Lower-Income Sites Identified									
Table ID	APNs	Consolidated Site Letter	Address	Zone	Area District	Acres	Existing Uses	Net New Units	Maximum Units Allowed
1	4170-026-003* 4170-026-004*	A	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	21
2	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	20
Total	—	—	—	—	—	**0.96**	—	**18**	**41**
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 Suitability of Non-Vacant SitesSite 1

Site 1, labeled as "Table ID 1," is composed of two parcels, owned by a private individual/entity, 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. Both parcels are zoned as CL zone which is one of three mixed use zones in the City.

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. This use is also not considered an impediment to development as the need for traditional office spaces is decreasing as a result of increased telecommuting opportunities due to the Coronovirus-19 pandemic. Therefore, there is a strong possibility that the use may be vacated during the planning period.

This site is feasible for redevelopment for the following reasons:

- **Adequate Parcel Size:** This site achieves an acreage of 0.49 which is just below the threshold and is considered adequate to accommodate lower-income units.
- **Maximum Unit Potential:** The site can achieve 21 units considering the maximum capacity which is well over the 16 unit minimum threshold required for certain programs and funding sources for affordable housing development.
- **Parcel Characteristics:** The two parcels are abutting and being identified as a single site for consolidation. The orientation and characteristics of the parcels are prime for consolidation as they both have standalone buildings are oriented toward the property line abutting the street and feature adequate sized surface parking lot areas to the rear of the parcel. Additionally, the building in one of the parcels (APN 4170-026-004) only occupies 1/3 of the lot area.

- **Consolidation Potential:** While the two parcels do not share common ownership, the feasibility of consolidation is supported by planned development in the City which includes a consolidation component regardless of ownership (see Section 5.1 and5.2 for details).
- **Incentives for Consolidation:** The City is also providing incentives for lot consolidation to improve redevelopment certainty during the planning period. Utilizing the consolidation density bonus through Program 16 does not preclude the project from also utilizing density bonus permitted under State law. Development trends in the City indicate a strong utilization of density bonus and additional incentivizes to maximize development potential as lot size are very small in the City.
- **Building Age:** The buildings are considered underutilized, and the uses are expected to discontinue within the planning period as the buildings are over 58 years old or older and are beginning to need major repairs.
- **Existing Uses:** There are no residential uses on this site. Existing uses on the lots include a REMAX agency office and a vacated Pilates studio which are not considered essential nor a deterrent to redevelopment and are considered marginal. The uses can be expected to discontinue through the planning period as is evident by the current vacancy status.
- **LTI Ratio:** The LTI ratios was also analyzed to determine the potential for redevelopment. With a low LTI ratio of 0.30 and 0.38, 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.
- **Underbuilt:** The FAR underbuilt calculation applies to this site as it is commercially zoned. As described in Section 3.1, to identify "underbuilt" parcels, the current building square footage is divided by the maximum building square footage permitted under the development code. For example, if the building square footage is 2,500 square feet and the maximum buildable floor area is 5,000 square feet, the building is utilizing 50 percent of the allowable FAR. Where FAR, expressed as a decimal is less than 1.0, sites were considered underbuilt. The FAR numbers are provided on a parcel by parcel basis in Exhibit A. Both parcels on this site include FAR at or below 31% percent.
- **Permit Trends in Mixed Use Zones:** The City has not received any interest or application for 100 percent commercial projects since 2020. Market trends through pipeline projects also support the development of this site as residential as recent applications which initially included a commercial component have been revised and/or are in the process of being revised to remove the commercial component as the developer has noted the residential component is the most financially feasible.
- **Bonus Incentives:** Qualifying projects under State density bonus for inclusion of very low- and low-income units coupled with additional lot consolidation incentives create the potential for this site to achieve 32 maximum units.

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. And as is evident in planned development projects (Section 5.1 and 5.2) developers are utilizing any qualifying incentive to maximize the development potential of site. 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.

4.1.3.2 Site 2

Site 2, labeled as "Table ID 2," is a square-shaped single parcel, owned by private individual/entity, 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. This site is feasible for redevelopment for the following reasons:

- **Adequate Parcel Size:** This site is 0.46 acres which is just below the threshold and is considered adequate to accommodate lower-income units.
- **Maximum Unit Potential:** The site can achieve 20 units considering the maximum capacity which is well over the 16-unit minimum threshold required for certain programs and funding sources for affordable housing development.
- **Parcel Characteristics:** The orientation and characteristics of the parcels including surrounding residential uses are conducive to residential redevelopment on this site. The building is oriented toward the rear of property line and features a large surface parking lot toward the property line abutting the street. Additionally, the building only occupies less than 1/2 of the lot area.
- **Building Age:** In addition to being identified as an underutilized site, the building is over 59 years old and is beginning to need major repairs.
- **Existing Uses:** There are no residential uses on this site. The existing use on the lot is fraternal organization is not a franchise nor an essential business and is considered marginal. Therefore, the use is not a deterrent to redevelopment as the use can be expected to discontinue through the planning period.
- **LTI Ratio:** The LTI ratio was also analyzed to determine the potential for redevelopment. With a low LTI ratio of 0.97, 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 as the site is undervalued.
- **Bonus Incentive:** Qualifying projects under State density bonus for inclusion of very low- and low-income units coupled create the potential for this site to achieve 30 maximum units.

Again, the conditions of the building and parking lot are in need of repair.

Additionally, while there is no known local knowledge of developer interest on this site itself, the site located in an area of the City where there is both developer and property owner interest to redevelop and sell property. These sites include the planned residential project detailed in Section 5.2, which is located one block east of Site 2, and, the second area identified as redevelopment interest includes a commercially zoned area west of Site 2, on the northeast corner of Sepulveda Blvd. and Artesia Blvd.

Site 2 does not require lot consolidation but is considered an adequate size site and is one of the only residential parcel of such size found in the City at 0.46 acres when compared to the median parcel size in the City is 0.06 acres. 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 two non-vacant parcels (Assessor's Parcel Number 4170-026-003, and 4170-026-004. See Table ID 1 in Table 7) to accommodate lower-income units that were previously identified in the 5th Cycle Housing Element. Therefore, the subject site (Table ID 1 in Table 7) is 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) in Section 3.

Non-Vacant Sites Methodology

The underutilized sites were selected based on the methodology described in Section 3.1 as there is a complete deficiency of vacant land. The City relies on non-vacant sites for moderate-income capacity, as an alternative to rely on vacant land simply does not exist. Furthermore, the lack of vacant land is not something that the City can directly control. Therefore, in selecting sites to accommodate moderate-income units, the City was limited to identifying sites that were underutilized per HCD criteria and methodology identified in Section 3.1, as previously mentioned.

Suitability of Non-Vacant Sites

A total of 23 sites were identified on non-vacant parcels considered underutilized with a total of 152 net new units. Of the 23 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. The sites identified to accommodate the moderate-income sites (Table 8) are feasible for redevelopment for the following reasons:

- **Parcel Characteristics:** The orientation and characteristics of the parcels are prime for redevelopment as more than 1/2 of the sites include parcels with a surface parking lot which have no existing structure.
- **Redevelopment Trends on sites with existing residential uses:** While only 1/3 of the sites have existing residential uses, most are underutilized and can accommodate a greater density of units. Local knowledge supports the redevelopment of sites with existing residential uses as 92 percent of residential projects in the City include the demolition of prior residential uses/units.
- **Existing Uses, Including Parking:** None of the sites identified include a use that is considered a constraint to development such as a franchise business, most sites identified include as a retail or office space and are considered marginal. No public parking lots have been identified the

sites inventory. No structures on the property have permanent uses, and have marginal uses which can be expected to discontinue through the planning period. None of the sites identified with parking lots are publicly owned and/or are used for access to the beach. Therefore, the redevelopment of the identified underutilized parking lots would not result in decreased public access to parking. Further there is no lease agreement that would prevent these sites from redevelopment. There are no structures or significant improvements on the sites that significantly add to the value of the property.

- **Building Age:** All of the buildings identified on the sites are older than 51 years with the newest building identified built in 1971 and the oldest in 1923 and are beginning to need major repairs. The median building age of the sites identified in 1952. Therefore, the sites have a strong feasibility for redevelopment potential.
- **Consolidation Potential:** Due to the small parcel size in the City, with a median on 0.06 acres, only 1/3 of the sites identified include the consolidation of parcels in order to maximize development potential. While parcels may or may not share common ownership, the feasibility of consolidation is supported by planned development in the City which provides include a consolidation component regardless of ownership (see Section 5.1 and 5.2 for details).
- **Consolidation Certainty:** To increase redevelopment certainty the City is extending their lot consolidation program (Program 16) to sites identified in the housing element which provides an additional density bonus for site consolidated parcel into one 0.3 acre or greater. Approximately 1/3 of consolidates sites meet the acreage criteria for this program.
- **LTI Ratio:** The LTI ratios were also analyzed to determine the potential for redevelopment. The median LTI ratio is 0.32, it can be expected that these sites 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.
- **Underbuilt:** The FAR underbuilt criteria applies to 18 commercially zoned sites. As described in Section 3.1, to identify "underbuilt" commercial parcels, the current building square footage is divided by the maximum building square footage permitted under the development code. For example, if the building square footage is 2,500 square feet and the maximum buildable floor area is 5,000 square feet, the building is utilizing 50 percent of the allowable FAR. Where building FAR, expressed as a decimal, is less than the maximum permitted FAR for the parcel, sites were considered underbuilt. The FAR numbers are provided on a parcel by parcel basis in Exhibit A. Note: Underbuilt residential parcels are analyzed through net new capacity.
- **Condition of Structures:** A visual analysis of the structures in the City was conducted to select sites that were likely in most need of repair in the coming years. Note, the City has special circumstances as property values are high and sites are adequately maintained. Therefore, condition of the building is not a reliable factor in determining the redevelopment potential. Other factors including existing uses, building age, LTI ratio, and FAR are more accurate factors to determine a sites redevelopment potential and have been considered in the selection of sites.
- **Market Trends:** There is a high market demand for residential development in the City. Approximately 2/3 of the site are located in a zone that allows for 100 percent nonresidential development; however, through communications with developers of current planned projects, applicants have noted they have opted out of including a commercial component as the residential portion of the project is the most profitable.
- **Permit Trends in Mixed Use Zones:** The City has not received any interest or application for 100 percent commercial projects since 2020. Market trends through pipeline projects also support

the development of this site as residential as recent applications which initially included a commercial component have been revised and/or are in the process of being revised to remove the commercial component as market demand for residential uses is greater.

- **Maximum Density:** Given the high cost of land and recent development trends, most developers are motivated to achieve the maximum height and densities permitted on the typical small lots in the City, the sites maximum potential is also considered in the selection of sites.

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.

Again, I general uses of the sites identified included commercial, retail, and some older residential uses. 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 and maximum units allowed per the maximum density 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	Maximum Units Allowed
3	4164016002 4164016003 4164016001	B	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	13
4	4164016010	N/A	1716 Manhattan Beach Blvd	CL	I	0.11	Stand-alone real estate office (LTI ratio 0.15, built 1955).	4	4
5	4170010014	N/A	939 Manhattan Beach Blvd	CL	II	0.09	Two-story beauty salon (LTI ratio 0.19, built 1958).	3	3
6	4170011015 4170011014	C	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
7	4170011010 4170011011 4170011012	D	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	12
8	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	7
9	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	12
10	4170025010 4170025008 4170025009	E	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	11
11	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	7
12	4179020012 4179020001 4179020013	F	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	4
13	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	4
14	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	4

Table 8. Moderate-Income Sites Identified									
Table ID	APNs	Consolidated Site Letter	Address	Zone	Area District	Acres	Existing Uses	Net New Units	Maximum Units Allowed
15	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	6
16	4170009800	N/A	953 Manhattan Beach Blvd.	CL	II	0.59	Telecommunications office building with large surface parking lot (built 1960).	20	25
17	4166009008	N/A	1426 12th Street	RH	II	0.24	Duplex (two existing units, LTI ratio 0.31, built 1942).	6	8
18	4166010006	N/A	1324 12th St.	RH	II	0.16	Single-family residence (one existing unit, LTI ratio 0.27, built 1953).	4	5
19	4166010008	N/A	1314 12th St	RH	II	0.16	Single-family residence (one existing, LTI ratio 0.32, built 1956).	4	5
20	4170024008 4170024009	G	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	6
21	4170014008 4170014009	H	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	4
22	4166008016	N/A	1451 12th St	RH	II	0.17	Duplex (two existing residential, LTI ratio 0.60, built 1954).	4	5
23	4170008027 4170008028	I	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	17
24	4175017007 4175017009	J	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	4
25	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	13
Total	—	—	—	—	—	**4.87**	—	**152**	**187**
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.

Non-Vacant Sites Methodology

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 sites identified to accommodate the above moderate-income sites (Table 9) are feasible for redevelopment for the following reasons:

- **Parcel Characteristics:** The orientation and characteristics of the parcels are prime for redevelopment as more than 1/2 of the sites include parcels with a dilapidated surface parking lot which have no existing structures.
- **Redevelopment Trends on Sites with Existing Residential Uses:** Only 2 sites (out of 11) have an existing single-family residential use both of which are underutilized, built before 1950, and can accommodate a greater density of units. Considering 92 percent of residential project include demolition of the previous residential use it is evident these sites are feasible for redevelopment. These permits include sites that were redeveloped from one unit to two or more units.
- **Existing Uses, Including Parking:** None of the sites identified include a use that is considered a constraint to development such as a franchise business. Existing uses on sites (not including the 2 sites with a residential use and 2 sites with empty parking lots) include retail, restaurant or office spaces; however, the uses are considered marginal and can be expected to discontinue during the planning period. None of the sites identified with parking lots are publicly owned and/or are used for access to the beach. Therefore, the redevelopment of the identified underutilized parking lots would not result in decreased public access to parking. Further there is no lease agreement that would prevent these sites from redevelopment. There are no structures or significant improvements on the sites that significantly add to the value of the property.
- **Building Age:** Sites with existing buildings include structures are older than 30 years. The newest building identified was built in 1989 and the oldest in 1924 and are beginning to need major repairs. The median building age of the sites identified in 1950s. Therefore, the sites have a strong feasibility for redevelopment potential.
- **LTI Ratio:** The LTI ratios were also analyzed to determine the potential for redevelopment. The median LTI ratio is 0.07, it can be expected that these sites 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.
- **Underbuilt:** The FAR underbuilt criteria apply to 8 sites as they are commercially zoned. As described in Section 3.1, to identify “underbuilt” commercial parcels, the current building

square footage is divided by the maximum building square footage permitted under the development code. For example, if the building square footage is 2,500 square feet and the maximum buildable floor area is 5,000 square feet, the building is utilizing 50 percent of the allowable FAR. Where building FAR, expressed as a decimal, is less than the maximum permitted FAR for the parcel, sites were considered underbuilt. The FAR numbers are provided on a parcel by parcel basis in Exhibit A. Note: Underbuilt residential parcels are analyzed through net new capacity.

- **Condition of Structures:** A visual analysis of the structures in the City was conducted to select sites that were likely in most need of repair in the coming years. Note, the City has special circumstances as property values are high and sites are adequately maintained. Therefore, condition of the building is not a reliable factor in determining the redevelopment potential. Other factors including existing uses, building age, LTI ratio, and FAR are more accurate factors to determine a sites redevelopment potential and have been considered in the selection of sites.
- **Market Trends:** There is a high market demand for residential development in the City. The majority of sites are located in a zone that allows for 100 percent nonresidential development; however, through communications with developers of current planned projects, applicants have noted they have opted out of including a commercial component as the residential portion of the project is the most profitable.
- **Permit Trends in Mixed Use Zones:** The City has not received any interest or application for 100 percent commercial projects since 2020. Market trends through pipeline projects also support the development of this site as residential as recent applications which initially included a commercial component have been revised and/or are in the process of being revised to remove the commercial component as market demand for residential uses is greater.
- **Maximum Density:** Given the high cost of land and recent development trends, most developers are motivated to achieve the maximum height and densities permitted on the typical small lots in the City, the sites maximum potential is also considered in the selection of sites.
- **Lot Consolidation:** None of the sites identified include multiple parcels for consolidation.

Again, 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	Maximum Units Allowed
26	4179004005	315 12th St	CD	III	0.06	Surface parking lot (LTI ratio 0.01)	2	3
27	4179022029	1213 Manhattan Avenue	CD	III	0.03	Stand-alone dentistry office (LTI ratio 0.51, built 1924)	1	1
28	4179028025	1409 Highland Avenue	CD	III	0.074	Stand-alone real estate office (LTI ratio 0.27, built 1989)	3	3
29	4137010006	3917 Highland Avenue	CNE	IV	0.04	Surface parking lot (LTI ratio 0.02)	1	2
30	4137008057	41st/Highland	CNE	IV	0.06	Surface parking lot (LTI ratio 0.006)	2	3

Table 9. Above Moderate-Income Sites Identified								
Table ID	APN	Address	Zone	Area District	Acres	Uses	Net New Units	Maximum Units Allowed
31	4175016005	316 Rosecrans Ave	CNE	III	0.06	Stand-alone restaurant (LTI ratio 0.08, built 1939)	2	3
32	4137002016	Rosecrans/Vista	CNE	IV	0.04	Empty parking lot (LTI ratio N/A)	1	2
33	4137010022	Porto/Ocean	RH	IV	0.03	Empty parking lot (LTI ratio N/A)	1	1
34	4179014013	815 Manhattan Ave	CD	III	0.06	Office building, clothing store, and furniture store (LTI ratio 0.26, built 1972)	2	3
35	4166008007	1407 12th St	RH	II	0.12	Single-family residence, one existing unit (LTI ratio 0.08, Built 1956)	3	4
36	4166008002	1416 15th St	RM	II	0.17	SFR, 1 existing unit (LTI ratio 0.42, Built 1954)	1	2
Total	–	–	–		**0.74**	–	**19**	**27**

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 77 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 multifamily development project in the CL zone, Area District I, consisting of 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. While the project initially included a commercial component, the applicant is updating the project to a 100 percent residential development as market demand for residential uses is greater.

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, the City issued 15 ADU permits in 2021, and in the first half of 2022 alone (January through June 2022) the City permitted 18 ADUs and an additional four ADU permit applications received in July 2022 are currently under review. Not accounting for permit applications currently under City review or the second half of 2022, an average of 12 ADUs were permitted per year between 2020-2022. **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	15
2022 to date (January-July 2022)	18[1]
Average for 2020-2022	**12 Per Year**

Source: HCD Housing Element Implementation and APR Data Dashboard, 2021

1. This number does not include the four ADU applications submitted in late July 2022 that are currently under City review as of August 1, 2022).

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. This is evident by the number of applications received and permits issued for ADUs in 2021 and 2022 to date (August 2022). Between January 2021 through July 2022, the City received a total of 27 ADU applications. Five of those 27 applications were permitted in 2021 and 18 of those 27 applications were permitted in 2022 (note that the remaining 10 permits issued in 2021 correspond to applications received prior to 2021. See **Table 11** for total permits issued). The remaining four of the 27 applications were received during the second half of July 2022 and are therefore still being processed as of August 2022.

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 July 2022, 18 ADUs have been permitted in 2022 and four 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 2019 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 2019, recent upward trends in 2021 and 2022, 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.[2] 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.[3]

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
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, Shortfall 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.

[2] https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527

[3] 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.

As shown in Table 13, the City has a total capacity for 75 lower-income units, 157 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 412units; 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 20.6acres 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 412 units of housing appropriate to accommodate lower-income households. The will identify a surplus of sites (at least 15% of the lower income RHNA or 3.65 acres) to ensure capacity is available and to account for sites that will potentially remain as commercial as such, complying with the provisions of Senate Bill 166 (2017).

Separately from Program 2, the City has identified an additional buffer of potential rezone sites to rezone in the event the City needs to identify additional capacity to accommodate the RHNA throughout the planning period.

Table 14,Acreage Site Capacity Needed to Accommodate Lower Income Shortfall, 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. Shortfall: Summary of Residential Capacity Compared to 6th Cycle RHNA 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)	189	18	152	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
Total Capacity (Net New Units)	365	75	157	133

Total Capacity Deficit (-) OR Surplus (+)	—	–412	+2	+1
Additional Capacity to Accommodate Shortfall Through Adequate Sites Program Overlay	412	412	—	—
Additional Capacity for Buffer Through Rezoning and Overlay	73	73	—	—

RHNA = Regional Housing Needs Allocation

Table 14. Acreage Site Capacity Needed to Accommodate Lower-Income Shortfall

	Units	Acreage
Adequate Sites Program Overlay to Address Lower-Income Shortfall	412	20.6
Rezone and Overlay to Address Lower-Income Buffer	73	3.65
Total	**485**	**24.25**

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.



Figure 1. Northwest Sites Identified

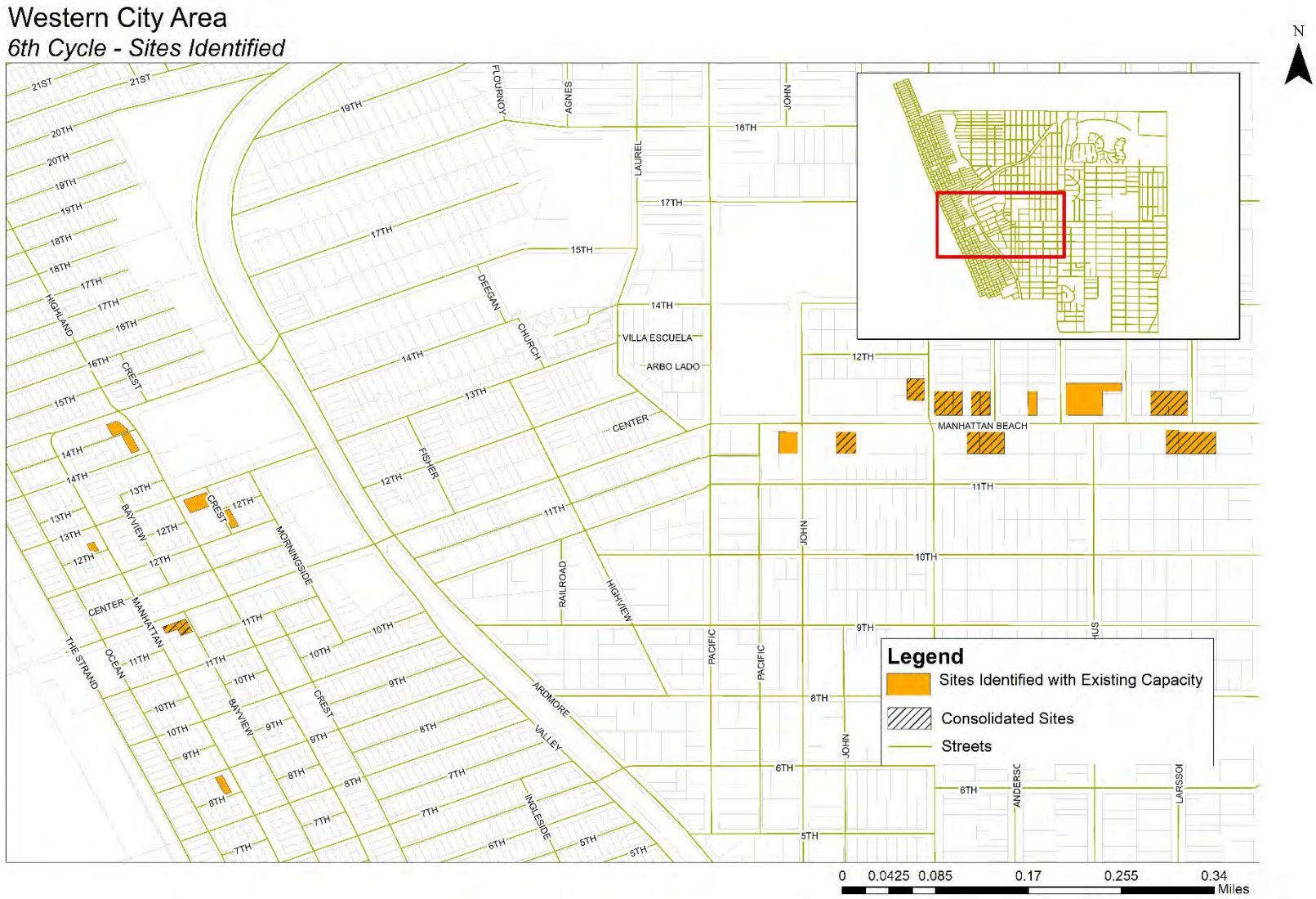


Figure 2. Western Sites Identified

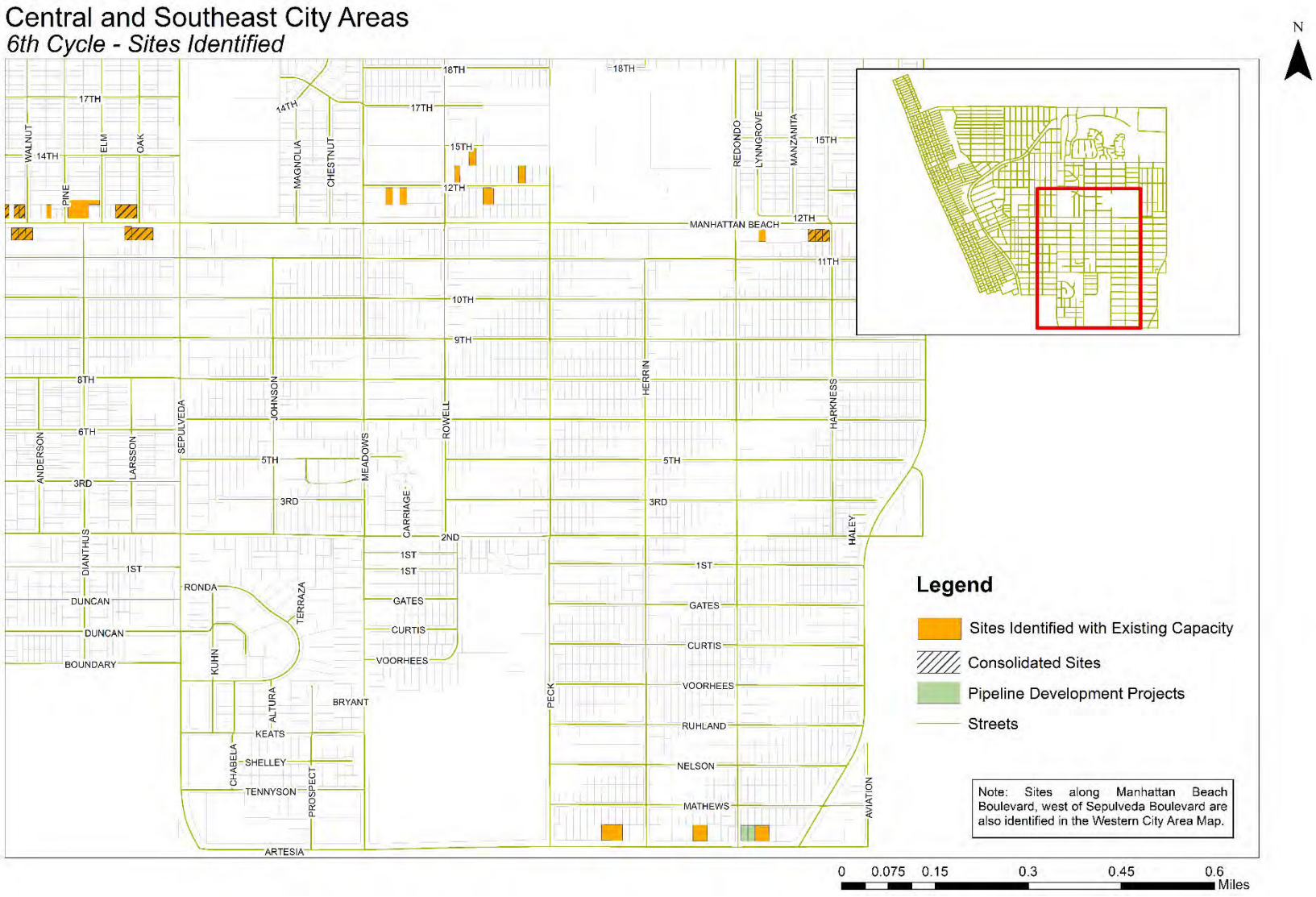


Figure 3. Central and Southeast Sites Identified

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 412 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 20.6 acres of these sites (see Program 2 for additional details) to accommodate the shortfall of lower-income units. Through this effort the City will identify additional capacity to include in the overlay to allow for flexibility in the redevelopment of sites to accommodate the lower-income RHNA and to include a safeguard in the analysis and capacity identification in the event the sites are not lost as they continue to be used for commercial uses. The additional buffer acreage and sites will be selected from **Table 15, Potential Underutilized Sites for Overlay,** and will be determined during the implementation of the program. 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**, Potential Buffer Sites to Accommodate Lower-Income RHNA Throughout the Planning Period. As detailed in Section 7.2, the City also identifies 7 sites for a total of 115 lower-income buffer units to be rezoned if additional lower-income RHNA capacity is needed throughout the planning period. below (see Section 7.2 for details).

7.1 Sites to Accommodate Lower-Income Shortfall

To accommodate the remaining lower-income RHNA and 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. To accommodate their RHNA, 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 lower-income buffer sites. The City has identified a surplus of over 48 percent of the units required to accommodate the lower-income RHNA units. While this analysis includes a thorough review of sites most likely to redevelop through the underutilized criteria described below, the City will conduct a robust community engagement process to identify priority sites and finalize sites to form part of the overlay from the

selection of sites identified in Table 15. 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

The City relies on non-vacant sites for lower-income capacity as an alternative to rely on vacant land simply does not exist. Furthermore, the lack vacant land is not something that the City can directly control. Therefore, in selecting sites to accommodate lower-income units the City was limited to identifying sites that were underutilized per HCD criteria.. 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. Current floor area ratio is calculated dividing the building square by the parcel size and is expressed as a decimal. This indicator helps identify opportunity sites from a redevelopment perspective as there is land is considered to be underbuilt when the current floor area ratio is less than the floor area ratio permitted under the development standards.
- **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:

- Potential to consolidate sites
- Redevelopment feasibility of the existing use
- 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. The 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 in the City and Surrounding Cities

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 in 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 multifamily residential project, both of which are located along corridors with both residential and commercial uses and are zoned as commercial. Although xed-use developments in the City of Redondo Beach and El Segundo are

also located along commercial corridors, the City has not received any interest or application for 100 percent commercial projects since 2020.

Market trends through aforementioned pipeline projects also support the development of sites on mixed use zones as fully residential as recent applications which initially included a commercial component have been revised and/or are in the process of being revised to remove the commercial component as market demand for residential uses is greater. 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.

7.1.6 Site Feasibility

A total of 33 sites were identified as having the potential to accommodate the City's lower income RHNA shortfall of 412 units. Building on the analysis above, this section provides a summary highlighting key features that were considered and contribute to the sites' feasibility for redevelopment including:

- **Adequate Parcel Size:** All of the sites achieve a minimum acreage of 0.5 units which meets the threshold to be considered adequate to accommodate lower-income units. There are no large sites (greater than 10 acres).
- **Developer interest:** There are 7 sites with developer and/or property owner interest (Table ID 10, 28, 29, 30, 31, 34, and 35) to redevelop the site within the planning period. Several property owners have also contacted the City regarding participating in the overlay effort.
- **Existing Uses, Including Parking:** None of the sites identified include a use that is considered a constraint to development such as a franchise business, most sites identified include a retail or office space. None of the sites are in the Coastal Zone. Uses are marginal and can be expected to be discontinued through the planning period. None of the sites identified in Table 15 with parking lots are publicly owned and/or are used for access to the beach. Therefore, the redevelopment of the identified underutilized parking lots would not result in decreased public access to parking. Further there is no lease agreement that would prevent these sites from redevelopment. There are no structures or significant improvements on the sites that significantly add to the value of the property.
- **Regional Coordination for Housing Development:** The City is participating in the South Bay Cities Council of Governments (SBCCOG) Housing Roadmap which is studying the reuse of commercial corridor areas to develop tools incentivizing potential for redevelopment into sustainable affordable housing with zero emission mobility options, and identify commercial properties – strip arterials, regional malls, office buildings, and industrial parks. Through this program, the City will further support the redevelopment of these sites through tools identified in the study.
- **Consolidation Potential:** Approximately 1/3 of the sites identify several parcels for consolidation into one site. Due to the small parcel size in the City, the CG zones have median parcel size of 0.21 acres; therefore, a little under half of the sites identified include the consolidation of parcels in order to maximize development potential. While parcels may or may not share common ownership, the feasibility of consolidation is supported by planned development in the City which provides include a consolidation component regardless of ownership (see Section 5.1 and 5.2 for details).
- **Consolidation Certainty:** To incentivize the potential for consolidation the City is increasing redevelopment certainty through additional density bonus through Program 16. All consolidated sites qualify for the incentive. Projects utilizing the additional bonus are still able to apply for an additional density bonus under State law. Development trends in the City indicate a strong utilization of density bonus and additional incentivizes to maximize development potential as lot size are very small in the City.
- **Building Age & Repair Needs:** The buildings are considered underutilized, and the uses are marginal and can be expected to discontinue within the planning period as the buildings are over 32 years old or older and are beginning to need major repairs as verified through a visual analysis of the buildings.

- **Underbuilt:** All of the sites included as potential sites to be included in the overlay are considered underbuilt. As described in **Section 7.1.1, Nonvacant Sites Methodology,** to identify "underbuilt" commercial parcels, the current building square footage is divided by the maximum building square footage permitted under the development code. For example, if the building square footage is 2,500 square feet and the maximum buildable floor area is 5,000 square feet, the building is utilizing 50 percent of the allowable FAR. Where building FAR, expressed as a decimal, is less than the maximum permitted FAR for the parcel, sites were considered underbuilt. The FAR numbers are provided on a parcel by parcel basis in Exhibit A. Note: Underbuilt residential parcels are analyzed through net new capacity.
- **Condition of Structures:** A visual analysis of the structures in the City was conducted to select sites that were likely in most need of repair in the coming years. Note, the City has special circumstances as property values are high and sites are adequately maintained. Therefore, condition of the building is not a reliable factor in determining the redevelopment potential. Other factors including existing uses, building age, LTI ratio, and FAR are more accurate factors to determine a sites redevelopment potential and have been considered in the selection of sites.
- **Market Trends & Capacity Contingency:** Sites included in the overlay may still remain as a commercial use as permitted by the base zoning district and the requirements outlined in Program 2 are applicable when the site is redeveloped, such as requiring the residential use to occupy at least 50 percent of the floor area in a mixed-use project. Although market and permit trends coupled with local knowledge demonstrate a demand for residential projects, the City will identify additional capacity (more than the 20.6 required acres) from the pool of sites identified in Table 15 to ensure that sufficient capacity existing to accommodate lower-income shortfall throughout the planning period. This additional capacity considered the possibility of sites that may continue as commercial uses.
- **Permit Trends in Mixed Use Zones:** The City has not received any interest or application for 100 percent commercial projects since 2020. Market trends through pipeline projects also support the development of this site as residential as recent applications which initially included a commercial component have been revised and/or are in the process of being revised to remove the commercial component.
- **Bonus Incentives:** Qualifying projects under State density bonus for inclusion of very low- and low-income units coupled with additional lot consolidation incentives create the potential for this site to achieve 32 maximum units.

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)	Lower Income Units (Potential Capacity at 30 du/acre or 16 unit minimum)	Existing Uses
1	4169006006 4169006005 4169006007	A	CG	I	0.55	10	16	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	33	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	C	CG	II	1.04	23	32	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	19	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	24	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								
Table ID	APNs	Consolidated Site Letter	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 du/acre)	Lower Income Units (Potential Capacity at 30 du/acre or 16 unit minimum)	Existing Uses
6	4170007021 4170007022 4170007017 4170007016	F	CG	II	0.50	9	16	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	I	0.65	13	19	Church building with large surface parking lot (LTI ratio 0.80, built 1966).
8	4170037001 4170037002	G	CG	I	0.50	9	16	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	16	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	18	Stand-alone garden center (APN 4169014048, LTI ratio 0.33, built 1974). Garden center store (APN 4169014016, LTI ratio 0.27, built 1954). The property owner has interest to be included in the overlay to permit residential uses.
11	4167023013 4167023032	J	CG	I	0.66	13	19	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	20	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	19	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	20	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	16	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	16	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

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)	Lower Income Units (Potential Capacity at 30 du/acre or 16 unit minimum)	Existing Uses
								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	25	Stand-alone office building for an insurance agency with large surface parking lot (LTI ratio 3.37, built 1969).
18	4165024033	N/A	CG	II	0.51	10	16	Corner lot gas station (LTI ratio 0.12, built 1990).
19	4166020030	N/A	CG-D8	II	0.68	13	20	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	153	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	20	Car wash service (LTI ratio 0.51, built 1972).
22	4173032034	N/A	CG	II	0.68	13	20	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	87	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	21	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	16	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	25	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	44	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	24	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	26	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	79	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).

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)	Lower Income Units (Potential Capacity at 30 du/acre or 16 unit minimum)	Existing Uses
31	4138018045	N/A	PD	II	4.79	95	143	Stand-alone five-story commercial building with a gym, coworking offices, and a parking garage with property owner interest to be included in the overlay for redevelop of site. (LTI ratio 1.93, built 1982).
32	4138020056	N/A	CG-D8	II	3.29	65	98	Large, vacated stand-alone building with developer interest (LTI ratio 1.49, built 1978).
33	4166023016	N/A	CG-D8	II	4.46	89	133	Residence Inn hotel has begun to experience a downturn trend condition and there is developer interest to redevelop into multifamily units.
Total	–	–	–	–	**42.75**	**844**	**1,145**	

APN = Assessor's Parcel Number; du/acre = dwelling units per acre; LTI = land-to-improvement; N/A = not applicable

7.2 Potential Buffer Sites to Accommodate Lower-Income RHNA Throughout the Planning Period

As previously mentioned, in addition to establishing an overlay in the CG and PD zones to accommodate the shortfall of 412 lower-income units, the City has identified an additional 8.47 acres of potential rezone sites in the event there is a shortfall of lower-income sites during the planning period 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 in the event additional capacity is needed to accommodate the lower-income RHNA. **Table 16, Potential Buffer Rezone Sites for Lower-Income Units**, 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 7 sites, a total of 115 net new units, as it accounts for existing residential uses, in the RS and RM zones which could be rezoned to a commercial zone (rezone to CD or CL which be determined during rezone and program implementation) which will utilize development standards of the RH zone which meets the default density of 30 dwelling units per acre required for lower-income sites. Two sites are identified in the PD zone which will form part of the overlay to allow for residential development and the development standards for these sites would be determined through the development the rezone. Through Program 18, 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.

The realistic capacity for lower-income units is again calculated at 20 dwelling units per acre. Table ID 34 through 36 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 37 and 38, 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 38, 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 City will first identify a surplus of sites as part of the overlay and if there is a remaining need for capacity, an additional buffer is identified in Table 16. These sites will not be subject to the program requirements under Program 2 as is required for the shortfall of sites. Table ID 39 and 40 are both City-owned sites that have been identified as buffer sites that may accommodate lower-income housing in the event there is a need for additional identification of capacity throughout

the planning period. Table ID 39, is part of the Manhattan Beach Country Club operated by a lessee; however, the City owns the land. The Country club facilities are not being identified as a potential buffer site. Only the parking area is included in the acreage and calculation of buffer units. Table ID 40 is also a City-owned site which serves as additional parking (not the primary parking lot) for the Manhattan Village Soccer Field and Manhattan Senior Villas. Similarly, only the additional parking lot area is included in the acreage and calculation of buffer units. If additional capacity is needed during the planning period, the City will consider identifying this site as surplus and making the site available for lower-income housing development in accordance with Government Code Section 54220-54234. At this time, a schedule of actions including the date the City is identified as surplus and release of a request for proposals is premature. Additionally, the City has identified a surplus of 48 percent of units needed to accommodate shortfall of 412.

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. Potential Buffer Rezone Sites for Lower-Income Units								
Table ID	APNs	Consolidated Site Letter	Zone	Area District	Acres	Lower Income Units (Realistic Capacity at 20 dwelling units per acre)	Maximum Units Allowed	Existing Uses
34	4166007018 4166007014 4166007013 4166007012	P	RM	II	0.61	5	21	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.
35	4166007008 4166007009 4166007010	Q	RM	II	0.51	4	16	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.
36	4169024004 4169024005	R	RM	I	0.55	8	20	Single-family residence, detached (APN 4169024004, LTI ratio 0.25, built 1934); single-family residence, detached (APN 4169024005, LTI ratio 0.01, built 1937).
37	4171031021	N/A	RS	II	0.66	4*	9	Church with an approximate 0.44-acre surface parking lot (LTI ratio 0.53, built 1956).
38	4167013020	N/A	RS	I	1.63	5*	10	Church with an approximate 0.51-acre surface parking lot (LTI ratio 1.74, built in 1963).
39	4138018908	N/A	PD	II	1.64	32**	49	City owned Country club with surface parking lot and multiple tennis courts (LTI ratio N/A, City owned).Note, only the surface parking lot area has been included and incorporated as a potential buffer site. The acreage and capacity calculations are based on the surface parking lot area.
40	4138026900	N/A	PD	II	2.87	57**	86	City-owned large surface parking lot and recreation field associated as additional parking for the Manhattan Beach Village soccer field and Manhattan Senior Villas. (LTI ratio N/A, City owned). Note, only the surface parking lot area has been included and incorporated as a potential buffer site. This parking is underutilized and is used as additional parking for the uses noted above. The acreage and capacity calculations are based on the surface parking lot area.
Total		-	-	-	**8.47**	**115**	**211**	-

*Note: Calculated at 50% of the parking lot acreage indicated in the Existing Uses column

**Note: The City has identified this site as an additional buffer site in the event the City needs to identify additional lower-income RHNA capacity. Identification of this site as a buffer does not require the City to commit to listing the site as surplus land.

APN = Assessor's Parcel Number; du/acre = dwelling units per acre; LTI = land-to-improvement; N/A = not applicable

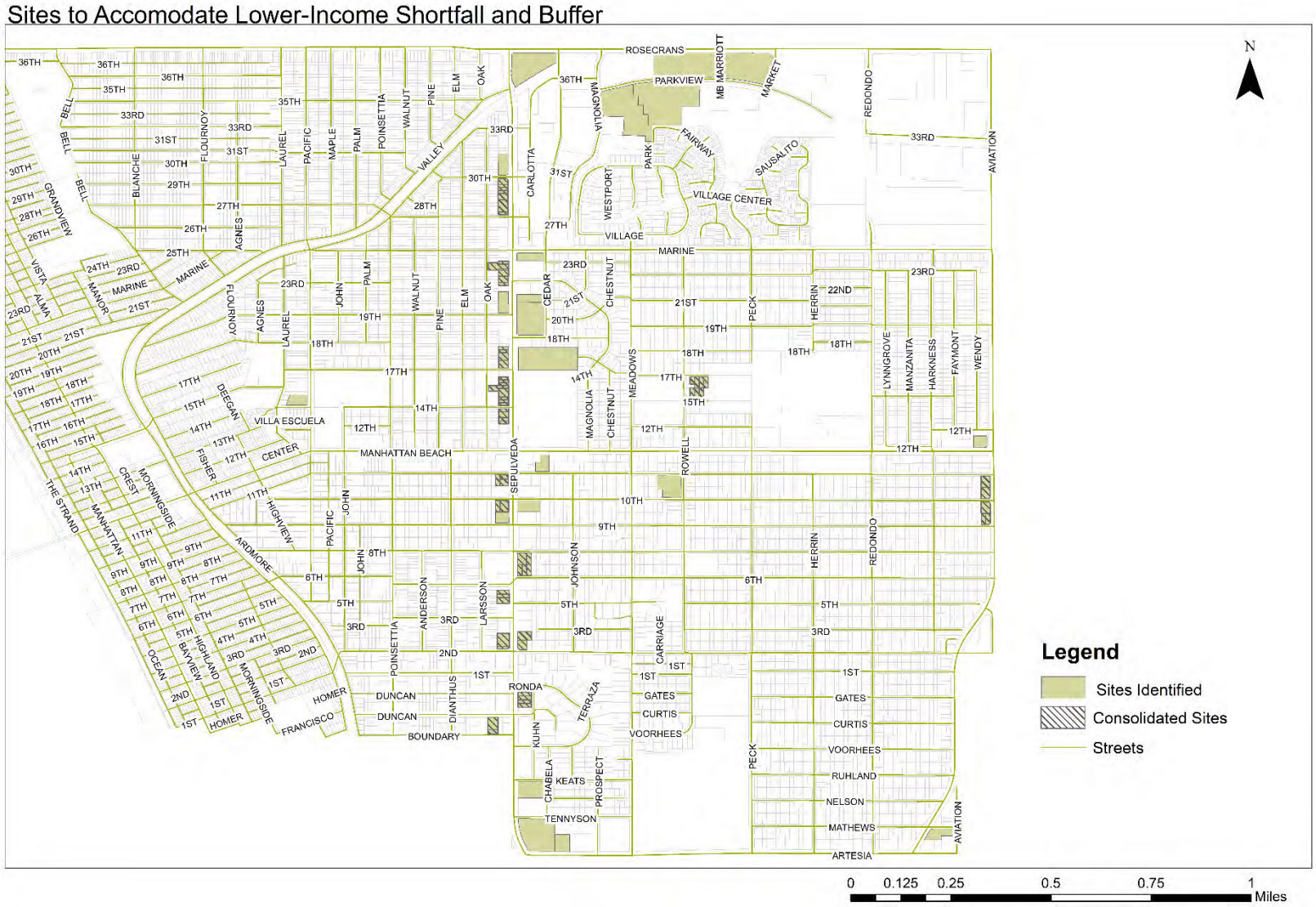


Figure 4. Sites to Accommodate Lower-Income Shortfall and Buffer

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	1030 MANHATTAN BEACH BL	90266	4170-026-003	A	(Local Commercial) CL	CL, Area District I	0	43.6	0.36	Remax Offices, star	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	7			7	LTI ratio 0.30	Built 1953	0.28 Existing FAR; 1.04 Allowable FAR
MANHATTAN BEACH	1026 MANHATTAN BEACH BL	90266	4170-026-004	A	CL	CL, Area District I	0	43.6	0.13	Two-story stand-al	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	2			2	LTI ratio 0.95	Built 1964	0.37 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1535 ARTESIA BLVD	90266	4163-024-028		High Density Residential (H	RH, Area District I	0	43.6	0.46	Masonic Center wit	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	9			9	LTI ratio 0.97	Built 1963	N/A
MANHATTAN BEACH	1756 MANHATTAN BEACH BL	90266	4164-016-002	B	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		4		4	LTI ratio 0.70	Built 1952	0.29 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1750 MANHATTAN BEACH BL	90266	4164-016-003	B	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		4		4	LTI ratio 0.27	Built 1952	0.16 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1762 MANHATTAN BEACH BL	90266	4164-016-001	B	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		3		3	LTI ratio 0.21	Built 1952	0.21 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1716 MANHATTAN BEACH BL	90266	4164-016-010		CL	CL, Area District I	0	43.6	0.11	Stand-alone real e	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		4		4	LTI ratio 0.11	Built 1955	0.31 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	939 MANHATTAN BEACH BLV	90266	4170-010-014		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	0.56 Existing FAR 1.2 Allowable FAR
MANHATTAN BEACH	917 MANHATTAN BEACH BLV	90266	4170-011-014	C	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		3		3	LTI ratio 0.70	Built 1964	0.32 Existing FAR 1.2 Allowable FAR
MANHATTAN BEACH	921 MANHATTAN BEACH BLV	90266	4170-011-015	C	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		3		3	LTI ratio 0.51	Built 1952	0.28 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	901 MANHATTAN BEACH BLV	90266	4170-011-010	D	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		4		4	LTI ratio 0.65	Built 1963	0.52 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	909 MANHATTAN BEACH BLV	90266	4170-011-012	D	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		3		3	LTI ratio 0.00	Built 1958	0.09 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	905 MANHATTAN BEACH BLV	90266	4170-011-011	D	CL	CL, Area District II	0	43.6	0.09	Vacated stand alon	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		3		3	LTI ratio 0.42	Built 1948	0.45 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	828 MANHATTAN BEACH BLV	90266	4170-023-007		CL	CL, Area District I	0	43.6	0.17	Stand-alone derma	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		7		7	LTI ratio 0.43	Built 1971	0.31 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1633 ARTESIA BLVD	90266	4163-009-020		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	N/A
MANHATTAN BEACH	910 MANHATTAN BEACH BLV	90266	4170-025-010	E	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		3		3	LTI ratio 0.13	Built 1941	0.00 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	920 MANHATTAN BEACH BLV	90266	4170-025-008	E	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		4		4	LTI ratio 0.93	Built 1978	0.62 Existing FAR 1.2 Allowable FAR
MANHATTAN BEACH	916 MANHATTAN BEACH BLV	90266	4170-025-009	E	CD	CL, Area District I	0	43.6	0.12	Triplex with 3 existi	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		2		2	LTI ratio 0.25	Built 1949	0.00 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1216 HIGHLAND AVE	90266	4179-004-001		(Downtown Commercial) C	CD, Area District III	0	51.2	0.15	Stand-alone two-s	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		6		6	LTI ratio 0.35	Built 1946	0.48 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	212 MANHATTAN BEACH BLV	90266	4179-020-012	F	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		1		1	LTI ratio 0.28	Built 1947	0.48 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	1120 MANHATTAN AVE	90266	4179-020-001	F	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		2		2	LTI ratio 0.40	Built 1940	0.98 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	208 MANHATTAN BEACH BLV	90266	4179-020-013	F	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		1		1	LTI ratio 0.10	Built 1923	0.46 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	1419 HIGHLAND AVE	90266	4179-028-001		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	0.47 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	3515 HIGHLAND AVE	90266	4175-024-023		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	0.59 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	4005 HIGHLAND AVE	90266	4137-009-058		CNE	CNE, Area District IV	0	51.2	0.13	Stand-alone vacat	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		5		5	LTI ratio 0.79	Built 1970	0.76 Existing FAR 1.7 Allowable FAR
MANHATTAN BEACH	953 MANHATTAN BEACH BLV	90266	4170-009-800		CL	CL, Area District II	0	43.6	0.59	Telecommunicatior	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		20		20	LTI ratio 0.00	N/A	0.92 Existing FAR; 0.98 Allowable FAR
MANHATTAN BEACH	1426 12TH ST	90266	4166-009-008		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	N/A
MANHATTAN BEACH	1324 12TH ST	90266	4166-010-006		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	N/A
MANHATTAN BEACH	1314 12TH ST	90266	4166-010-008		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	N/A
MANHATTAN BEACH	852 MANHATTAN BEACH BLV	90266	4170-024-008	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		2		2	LTI ratio 0.24	Built 1952	0.18 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	848 MANHATTAN BEACH BLV	90266	4170-024-009	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		3		3	LTI ratio 0.42	Built 1959	0.39 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1141 N POINSETTIA AVE	90266	4170-014-009	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		1		1	LTI ratio 0.10	Built 1940	0.00 Existing FAR; 1.2 Allowable FAR
MANHATTAN BEACH	1145 N POINSETTIA AVE	90266	4170-014-008	I	Medium Density Resientia	CL, Area District II	0	43.6	0.11	SFR, detached, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		2		2	LTI ratio 0.27	Built 1928	0.16 Existing FAR 1.2 Allowable FAR
MANHATTAN BEACH	1451 12TH ST.	90266	4166-008-016		HDR	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	N/A
MANHATTAN BEACH	1011 MANHATTAN BEACH BL	90266	4170-008-027	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		6		6	LTI ratio 0.14	Built 1963	0.07 Existing FAR; 1.17 Allowable FAR
MANHATTAN BEACH	1019 MANHATTAN BEACH BL	90266	4170-008-028	J	CNE	CL, Area District II	0	43.6	0.2	restaurant with lar	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		7		7	LTI ratio 0.44	Built 1952	0.35 Existing FAR; 1.16 Allowable FAR
MANHATTAN BEACH	3520 HIGHLAND AVE	90266	4175-017-007	K	CNE	CNE-D5, Area District I	0	51.2	0.04	Stand-alone two-st	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		2		2	LTI ratio 0.81	Built 1965	0.77 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	3514 HIGHLAND AVE	90266	4175-017-009	K	CNE	CNE-D5, Area District I	0	51.2	0.04	Commercial buildin	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		1		1	LTI ratio 0.88	Built 1936	0.43 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	1711 ARTESIA BLVD	90266	4163-008-038		CL	CL, Area District I	0	43.6	0.3	Graphic design offi	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		10		10	LTI ratio 0.39	Built 1959	0.25 Existing FAR; 1.07 Allowable FAR
MANHATTAN BEACH	315 12TH ST	90266	4179-004-005		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	0.93 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	1213 MANHATTAN AVE	90266	4179-022-029		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	0.85 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	1409 HIGHLAND AVE	90266	4179-028-025		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	1.24 Existing FAR 1.7 Allowable FAR
MANHATTAN BEACH	3917 HIGHLAND AVE	90266	4137-010-006		CNE	CNE, Area District IV	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	0.88 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	MOONSTONE ST/HIGHLAND A	90266	4137-008-057		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	1.00 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	316 ROSECRANS AVE	90266	4175-016-005		CNE	CNE, Area District III	0	51.2	0.06	Stand-alone restau	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			2	2	LTI ratio 0.08	Built 1939	0.09 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	HIGHLAND AVE/38TH PL	90266	4137-002-016		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	0.00 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	EL PORTO ST/OCEAN DR	90266	4137-010-022		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	N/A
MANHATTAN BEACH	815 MANHATTAN AVE	90266	4179-014-013		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	1.67 Existing FAR; 1.7 Allowable FAR
MANHATTAN BEACH	1407 12TH ST	90266	4166-008-007		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	3	LTI ratio 0.08	Built 1956	N/A
MANHATTAN BEACH	817 MANHATTAN AVE	90266	4166-008-002		RM	RM, Area District II	0	18.9	0.17	SFR, 1	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element			1	1	LTI ratio 0.42	Built 1954	N/A
MANHATTAN BEACH																					
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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	4169-006-006	Capacity captu	3			Shortfall of Sites	0.15	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Two -Story offi	A	LTI ratio 0.37	Built 1977
MANHATTAN	407 N SEPULVEDA BLVD	90266	4169-006-005	Capacity captu	4			Shortfall of Sites	0.23	CG	CG	See Program 2	CG	20	30	4	Non-Vacant	Small commer	A	LTI ratio 0.14	Built 1954
MANHATTAN	509 N SEPULVEDA BLVD	90266	4169-006-007	Capacity captu	3			Shortfall of Sites	0.15	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	State Farm rea	A	LTI ratio 0.67	Built 1987
MANHATTAN	2909 N SEPULVEDA BLVD	90266	4173-027-026	Capacity captu	3			Shortfall of Sites	0.19	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Smog check st	B	LTI ratio 1.06	Built 1989
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173-027-020	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Surface parkin	B	LTI ratio 0.06	Built 1969
MANHATTAN	2905 N SEPULVEDA BLVD	90266	4173-027-022	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Picture frame s	B	LTI ratio 0.00	Built 1947
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173-027-019	Capacity captu	4			Shortfall of Sites	0.19	CG	CG	See Program 2	CG	20	30	4	Non-Vacant	Medical offices	B	LTI ratio 3.09	Built 1946
MANHATTAN	2701 N SEPULVEDA BLVD	90266	4173-027-024	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Standalone bu	B	LTI ratio 0.42	Built 1948
MANHATTAN	2705 N SEPULVEDA BLVD	90266	4173-027-027	Capacity captu	8			Shortfall of Sites	0.39	CG	CG	See Program 2	CG	20	30	8	Non-Vacant	Standalone bu	B	LTI ratio 0.22	Built 1974
MANHATTAN	2809 N SEPULVEDA BLVD	90266	4173-027-021	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	surface parkin	B	LTI ratio 0.06	Built 1969
MANHATTAN	2401 N SEPULVEDA BLVD	90266	4171-013-041	Capacity captu	8			Shortfall of Sites	0.41	MU	CG/RS-D6	See Program 2	CG/RS-D6	20	30	8	Non-Vacant	Coreolgy Pilat	C	LTI ratio 0.51	Built 1961
MANHATTAN	2405 N SEPULVEDA BLVD	90266	4171-013-036	Capacity captu	2			Shortfall of Sites	0.1	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	One-story buil	C	LTI ratio 0.99	Built 1954
MANHATTAN	2301 N SEPULVEDA BLVD	90266	4171-013-030	Capacity captu	5			Shortfall of Sites	0.19	CG	CG	See Program 2	CG	20	30	5	Non-Vacant	Vacated Enter	C	LTI ratio 0.34	Built 1957
MANHATTAN	2317 N SEPULVEDA BLVD	90266	4171-013-034	Capacity captu	2			Shortfall of Sites	0.05	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Printing office,	C	LTI ratio 0.22	Built 1947
MANHATTAN	2301 N SEPULVEDA BLVD	90266	4171-013-029	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Parking Lot for	C	LTI ratio 0.00	N/A
MANHATTAN	2309 N SEPULVEDA BLVD	90266	4171-013-039	Capacity captu	4			Shortfall of Sites	0.2	CG	CG	See Program 2	CG	20	30	4	Non-Vacant	Real estate gr	C	LTI ratio 0.54	Built 1957
MANHATTAN	1701 N SEPULVEDA BLVD	90266	4171-014-034	Capacity captu	5			Shortfall of Sites	0.24	CG	CG	See Program 2	CG	20	30	5	Non-Vacant	Auto repair an	D	LTI ratio 0.66	Built 1968
MANHATTAN	1721 N SEPULVEDA BLVD	90266	4171-014-020	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Two-story buil	D	LTI ratio 0.33	Built 1923
MANHATTAN	1725 N SEPULVEDA BLVD	90266	4171-014-021	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	surface parkin	D	LTI ratio 0.00	Built 1950
MANHATTAN	1717 N SEPULVEDA BLVD	90266	4171-014-035	Capacity captu	4			Shortfall of Sites	0.24	CG	CG	See Program 2	CG	20	30	4	Non-Vacant	Auto service a	D	LTI ratio 0.31	Built 1972
MANHATTAN	1505 N SEPULVEDA BLVD	90266	4170-006-017	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Duplex with 2	E	LTI ratio 0.22	Built 1949
MANHATTAN	1509 N SEPULVEDA BLVD	90266	4170-006-018	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Stand-alone m	E	LTI ratio 0.06	Built 1950
MANHATTAN	1413 N SEPULVEDA BLVD	90266	4170-006-015	Capacity captu	5			Shortfall of Sites	0.28	CG	CG	See Program 2	CG	20	30	5	Non-Vacant	Stand-alone co	E	LTI ratio 0.26	Built 1955
MANHATTAN	1501 N SEPULVEDA BLVD	90266	4170-006-022	Capacity captu	5			Shortfall of Sites	0.25	MU	CG/RS-D6	See Program 2	CG/RS-D6	20	30	5	Non-Vacant	Two-story com	E	LTI ratio 0.39	Built 1964
MANHATTAN	1405 N Sepulveda Blvd	90266	4170-006-028	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Ingress and eg	E	LTI ratio 0.00	N/A
MANHATTAN	1401 N SEPULVEDA BLVD	90266	4170-006-013	Capacity captu	2			Shortfall of Sites	0.1	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Veterinarian of	E	LTI ratio 0.34	Built 1948
MANHATTAN	1405 N Sepulveda Blvd	90266	4170-006-027	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Auto service st	E	LTI ratio 0.00	N/A
MANHATTAN	1601 N SEPULVEDA BLVD	90266	4170-006-019	Capacity captu	1			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	1	Non-Vacant	Stand-alone sh	E	LTI ratio 0.27	Built 1965
MANHATTAN	1213 N SEPULVEDA BLVD	90266	4170-007-016	Capacity captu	2			Shortfall of Sites	0.1	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Hair salon and	F	LTI ratio 0.38	Built 1949
MANHATTAN	1309 N SEPULVEDA BLVD	90266	4170-007-022	Capacity captu	3			Shortfall of Sites	0.19	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Self-service ca	F	LTI ratio 0.42	Built 1965
MANHATTAN	1301 N SEPULVEDA BLVD	90266	4170-007-017	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Auto repair sh	F	LTI ratio 0.19	Built 1949
MANHATTAN	1315 N SEPULVEDA BLVD	90266	4170-007-021	Capacity captu	2			Shortfall of Sites	0.1	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Stand-alone m	F	LTI ratio 0.43	Built 1947
MANHATTAN	917 N SEPULVEDA BLVD	90266	4170-037-001	Capacity captu	6			Shortfall of Sites	0.32	CG	CG	See Program 2	CG	20	30	6	Non-Vacant	Stand-alone co	G	LTI ratio 0.40	Built 1956
MANHATTAN	1048 10TH ST	90266	4170-037-002	Capacity captu	3			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Surface parkin	G	LTI ratio 0.01	N/A
MANHATTAN	708 N SEPULVEDA BLVD	90266	4167-026-012	Capacity captu	6			Shortfall of Sites	0.34	CG	CG	See Program 2	CG	20	30	6	Non-Vacant	Corner lot with	H	LTI ratio 0.87	Built 1955
MANHATTAN	1116 8TH ST	90266	4167-026-011	Capacity captu	4			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	4	Non-Vacant	Two-story offic	H	LTI ratio 0.43	Built 1968
MANHATTAN	201 N SEPULVEDA BLVD	90266	4169-014-016	Capacity captu	2			Shortfall of Sites	0.09	CG	CG	See Program 2	CG	20	30	2	Non-Vacant	Garden center	I	LTI ratio 0.27	Built 1954
MANHATTAN	207 N SEPULVEDA BLVD	90266	4169-014-048	Capacity captu	10			Shortfall of Sites	0.53	CG	CG	See Program 2	CG	20	30	10	Non-Vacant	Stand-alone ga	I	LTI ratio 0.33	Built 1974
MANHATTAN	200 N SEPULVEDA BLVD	90266	4167-023-013	Capacity captu	6			Shortfall of Sites	0.28	CG	CG	See Program 2	CG	20	30	6	Non-Vacant	Stand-alone cl	J	LTI ratio 0.05	Built 1941
MANHATTAN	222 N SEPULVEDA BLVD	90266	4167-023-032	Capacity captu	7			Shortfall of Sites	0.37	CG	CG	See Program 2	CG	20	30	7	Non-Vacant	Auto repair sh	J	LTI ratio 0.13	Built 1964
MANHATTAN	224 S SEPULVEDA BLVD	90266	4168-025-008	Capacity captu	4			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	4	Non-Vacant	Two-story com	K	LTI ratio 0.75	Built 1952
MANHATTAN	204 S SEPULVEDA BLVD	90266	4168-025-011	Capacity captu	3			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Pet supply sto	K	LTI ratio 0.46	Built 1980
MANHATTAN	208 S SEPULVEDA BLVD	90266	4168-025-010	Capacity captu	3			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Auto repair sh	K	LTI ratio 0.20	Built 1953
MANHATTAN	210 Sepulveda Blvd	90266	4168-025-009	Capacity captu	3			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Large surface	K	LTI ratio 0.04	N/A
MANHATTAN	975 N AVIATION BLVD	90266	4164-003-027	Capacity captu	6			Shortfall of Sites	0.34	CG	CG	See Program 2	CG	20	30	6	Non-Vacant	Small commer	L	LTI ratio 0.52	Built 1984
MANHATTAN	909 N AVIATION BLVD	90266	4164-003-022	Capacity captu	3			Shortfall of Sites	0.16	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Small commer	L	LTI ratio 0.39	Built 1972
MANHATTAN	1853 9TH ST	90266	4164-003-030	Capacity captu	3			Shortfall of Sites	0.15	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Single Family	L	LTI ratio 0.50	Built 1952
MANHATTAN	1853 10TH ST	90266	4164-002-032	Capacity captu	6			Shortfall of Sites	0.34	CG	CG	See Program 2	CG	20	30	6	Non-Vacant	Cleaners, Smo	M	LTI ratio 0.20	Built 1957
MANHATTAN	1075 N AVIATION BLVD	90266	4164-002-001	Capacity captu	7			Shortfall of Sites	0.34	CG	CG	See Program 2	CG	20	30	7	Non-Vacant	One-story com	M	LTI ratio 0.25	Built 1953
MANHATTAN	1021 N SEPULVEDA BLVD	90266	4170-027-001	Capacity captu	3			Shortfall of Sites	0.13	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Two-story star	N	LTI ratio 1.49	Built 1948
MANHATTAN	1048 11TH ST	90266	4170-027-003	Capacity captu	3			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Surface parkin	N	LTI ratio 0.05	N/A
MANHATTAN	1015 N SEPULVEDA BLVD	90266	4170-027-023	Capacity captu	3			Shortfall of Sites	0.19	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Stand-alone re	N	LTI ratio 0.15	Built 1992
MANHATTAN	600 N SEPULVEDA BLVD	90266	4167-026-014	Capacity captu	4			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	4	Non-Vacant	Surface parkin	O	LTI ratio 0.00	N/A
MANHATTAN	1117 6TH ST	90266	4167-026-016	Capacity captu	3			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	Auto repair sh	O	LTI ratio 0.14	Built 1970
MANHATTAN	1111 6TH ST	90266	4167-026-015	Capacity captu	3			Shortfall of Sites	0.17	CG	CG	See Program 2	CG	20	30	3	Non-Vacant	One-story star	O	LTI ratio 0.61	Built 1944
MANHATTAN	1440 ROSECRANS AVE	90266	4138-018-022	Capacity captu	102			Shortfall of Sites	5.13	Manhattan Village (MV)	PD	See Program 2	PD	20	30	102	Non-Vacant	Five story stand-alone office b		LTI ratio 3.31	Built 1982
MANHATTAN	1500 ROSECRANS AVE	90266	4138-018-045	Capacity captu	95			Shortfall of Sites	4.79	MV	PD	See Program 2	PD	20	30	95	Non-Vacant	Stand-alone fiv		LTI ratio 1.93	Built 1982
MANHATTAN	700 S AVIATION BLVD	90266	4163-008-046	Capacity captu	17			Shortfall of Sites	0.85	CG	CG	See Program 2	CG	20	30	17	Non-Vacant	Stand-alone of		LTI ratio 3.38	Built 1969
MANHATTAN	1865 MANHATTAN BEACH BLVD	90266	4165-024-033	Capacity captu	10			Shortfall of Sites	0.5	CG	CG	See Program 2	CG	20	30	10	Non-Vacant	Corner lot gas		LTI ratio 0.12	Built 1990
MANHATTAN	2100 N SEPULVEDA BLVD	90266	4166-020-030	Capacity captu	13			Shortfall of Sites	0.67	CG	CG-D8	See Program 2	CG-D8	20	30	13	Non-Vacant	Office and con		LTI ratio 0.20	Built 1961
MANHATTAN	2414 N SEPULVEDA BLVD	90266	4166-019-026	Capacity captu	13			Shortfall of Sites	0.67	CG	CG-D8	See Program 2	CG-D8	20	30	13	Non-Vacant	Car wash serv		LTI ratio 0.52	Built 1972
MANHATTAN	3001 N SEPULVEDA BLVD	90266	4173-032-034	Capacity captu	13			Shortfall of Sites	0.68	CG	CG	See Program 2	CG	20	30	13	Non-Vacant	Commercial lo		LTI ratio 0.57	Built 1983
MANHATTAN	1800 N SEPULVEDA BLVD	90266	4166-020-034	Capacity captu	58			Shortfall of Sites	2.93	CG	CG-D8	See Program 2	CG-D8	20	30	58	Non-Vacant	Commercial ce		LTI ratio 0.63	Built 1955
MANHATTAN	2001 N SEPULVEDA BLVD	90266	4171-013-043	Capacity captu	14			Shortfall of Sites	0.7	CG	CG	See Program 2	CG	20	30	14	Non-Vacant	Small commer		LTI ratio 1.57	Built 1980
MANHATTAN	1126 10TH ST	90266	4167-028-036	Capacity captu	17			Shortfall of Sites	0.86	CG	CG-D8/RM	See Program 2	CG-D8/RM	20	30	17	Non-Vacant	Small commer		LTI ratio 0.43	Built 1960
MANHATTAN	901 N SEPULVEDA BLVD	90266	4170-037-023	Capacity captu	10			Shortfall of Sites	0.5	CG	CG-D8	See Program 2	CG-D8	20	30	10	Non-Vacant	Commercial re		LTI ratio 0.54	Built 1969
MANHATTAN	500 S SEPULVEDA BLVD	90266	4168-013-014	Capacity captu	29			Shortfall of Sites	1.49	CG	CG-D8	See Program 2	CG-D8	20	30	29	Non-Vacant	Commercial bu		LTI ratio 0.57	Built 1976
MANHATTAN	1145 ARTESIA BLVD	90266	4168-012-034	Capacity captu	16			Shortfall of Sites	0.83	CG	CG	See Program 2	CG	20	30	16	Non-Vacant	Stand-alone co		LTI ratio 1.64	Built 1961
MANHATTAN	700 S SEPULVEDA BLVD	90266	4168-012-029	Capacity captu	17			Shortfall of Sites	0.89	CG	CG	See Program 2	CG	20	30	17	Non-Vacant	Stand-alone ba		LTI ratio 0.71	Built 1964
MANHATTAN	1133 ARTESIA BLVD	90266	4168-012-036	Capacity captu	53			Shortfall of Sites	2.66	CG	CG	See Program 2	CG	20	30	53	Non-Vacant	Shopping cent		LTI ratio 0.77	Built 1960
MANHATTAN	1130 MANHATTAN BEACH BLVD	90266	4167-015-034	Capacity captu	13			Shortfall of Sites	0.65	CG	CG	See Program 2	CG	20	30	13	Non-Vacant	Church building with large sur		LTI ratio 0.80	Built 1966
MANHATTAN	3600 N SEPULVEDA BLVD MANHATTAN BEAC	90266	4138-020-056	Capacity captu	65			Shortfall of Sites	3.29	CG	CG-D8	See Program 2	CG-D8	20	30	65	Non-Vacant	Vacated Fry's electronic store		LTI ratio 1.49	Built 1985
MANHATTAN	1700 N SEPULVEDA BLVD	90266	4166-023-016	Capacity captu	89			Shortfall of Sites	4.46	CG	CG-D8	See Program 2	CG-D8	20	30	89	Non-Vacant	Residence Inn hotel with deve		LTI ratio 6.36	Built 1978
MANHATTAN BEACH																					
MANHATTAN BEACH																					

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, polices, 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	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.	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	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?	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.

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.

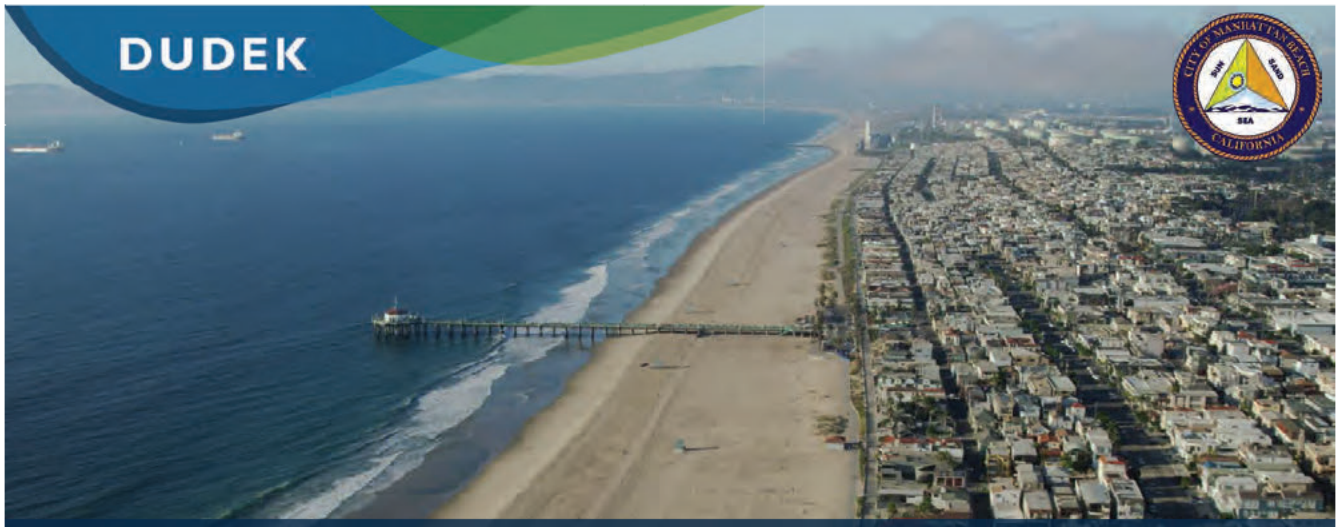
4b	1) Focusing almost entirely on mixed-use development with little history or evidence of significant results. Similar to most other South Bay cities, MB is apparently focusing mostly on encouraging mixed-use development to satisfy RHNA requirements. The problem though, is that Manhattan Beach has made 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.	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.
4c	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?	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. 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. 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.

4d	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.	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.
4e	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, 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.	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.

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



Manhattan Beach Housing Element Update

PRESENTED BY THE COMMUNITY DEVELOPMENT DEPARTMENT

AUGUST 24, 2021

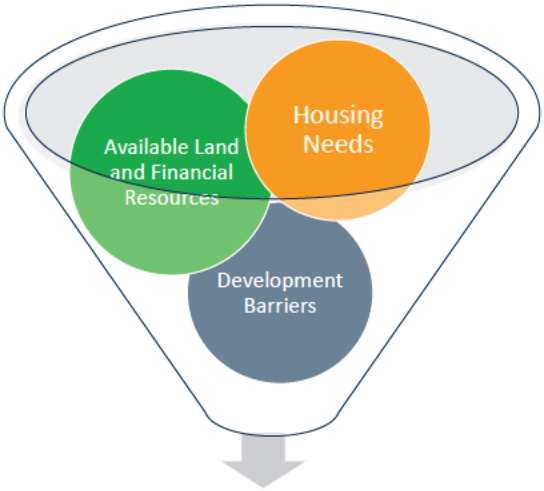
What is a Housing Element?

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

What does the data show?



Changing Population

- Changing Needs
- Older adults



Affordability

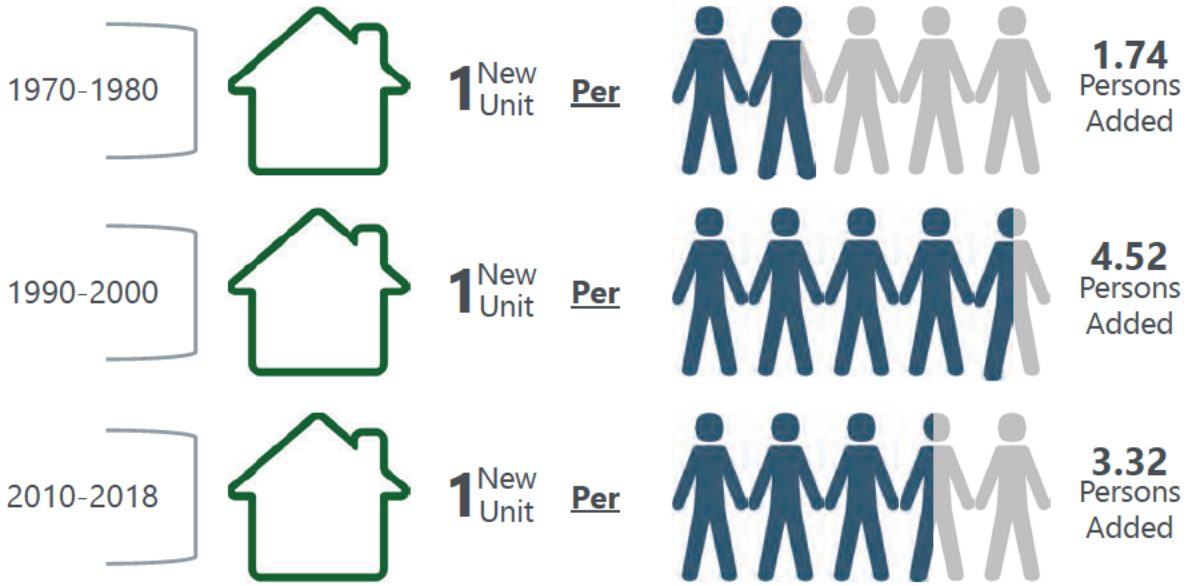
- Housing Overpayment
- Median Sale Price



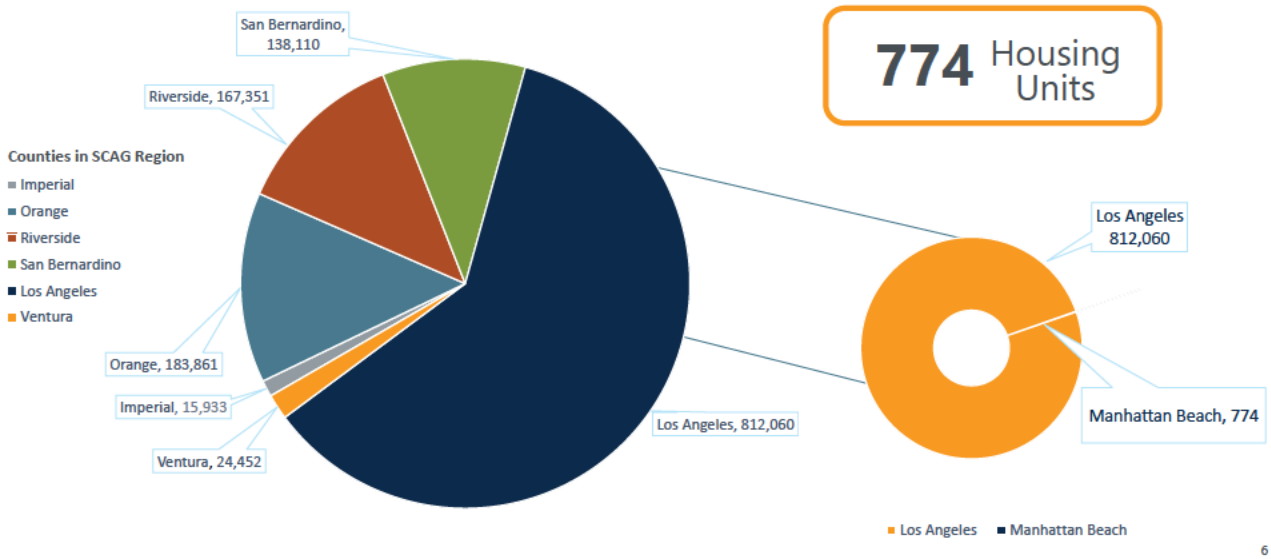
Housing Options

- Housing Supply

What does the data show?



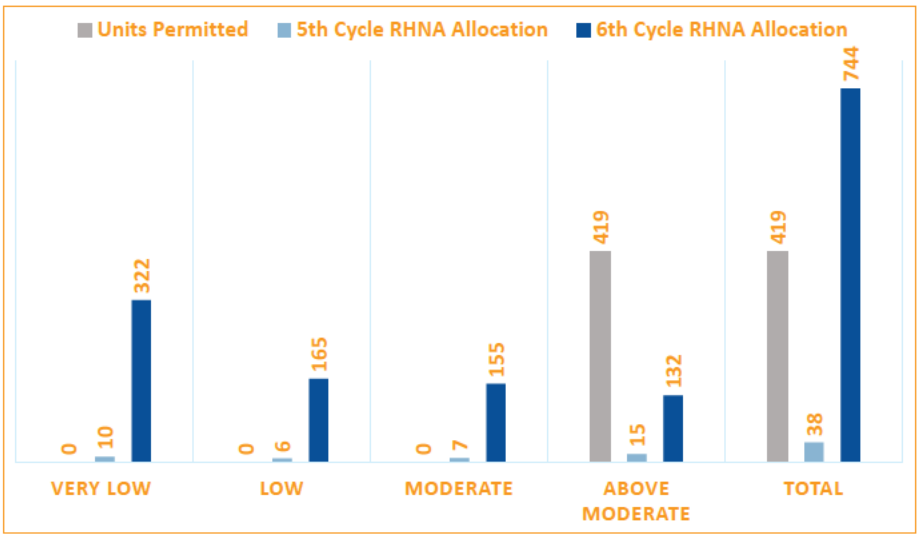
How many housing units does Manhattan Beach have to plan for?



5th Cycle RHNA Progress
Data Reported 2014-2020

5th Cycle Average Units Permitted Per Year = 60

6th Cycle Average Units Permitted Per Year Needed = 90



Housing Element Components

- Housing Needs Assessment
- Fair Housing Analysis
- Development Constraints and Barriers
- Sites Analysis and Inventory
- Goals, Policies, and Programs

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

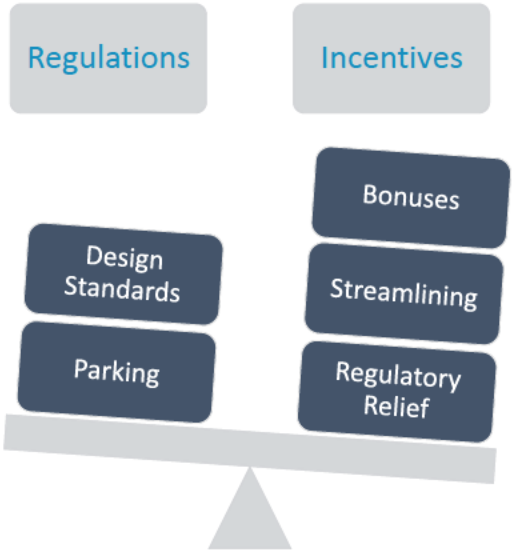


- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

Pathways to Development

Tools in the Toolbox





Policy Framework



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

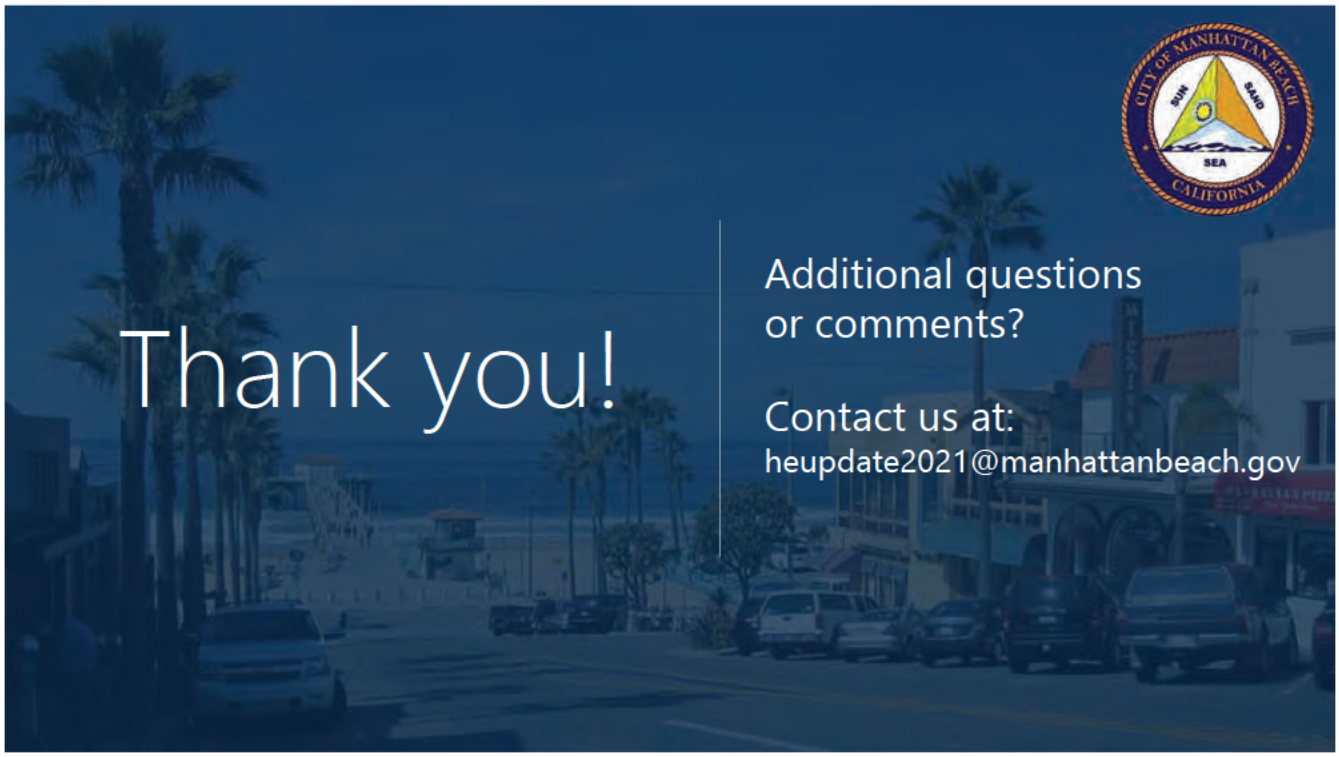

Thank you!
Additional questions or comments?
Contact us at:
heupdate2021@manhattanbeach.gov

EXHIBIT B



Manhattan Beach Housing Element Update

City Council

September 21, 2021

Overview

01 Project Overview

02 Barriers to Development

03 Policy Framework

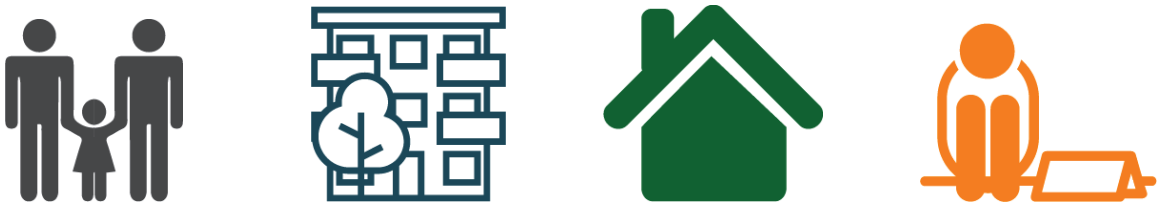
04 Sites Analysis

05 Next Steps

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.



2021 Income Limits

Los Angeles County Area Median Income (AMI): $80,000*

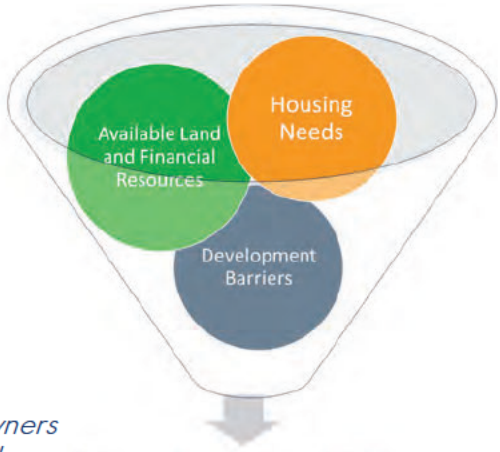
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What is the purpose of the Housing Element?

- Identify housing needs
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- Identify programs and actions to meet the needs
- Identify sites available for housing
- Facilitate housing production on sites identified

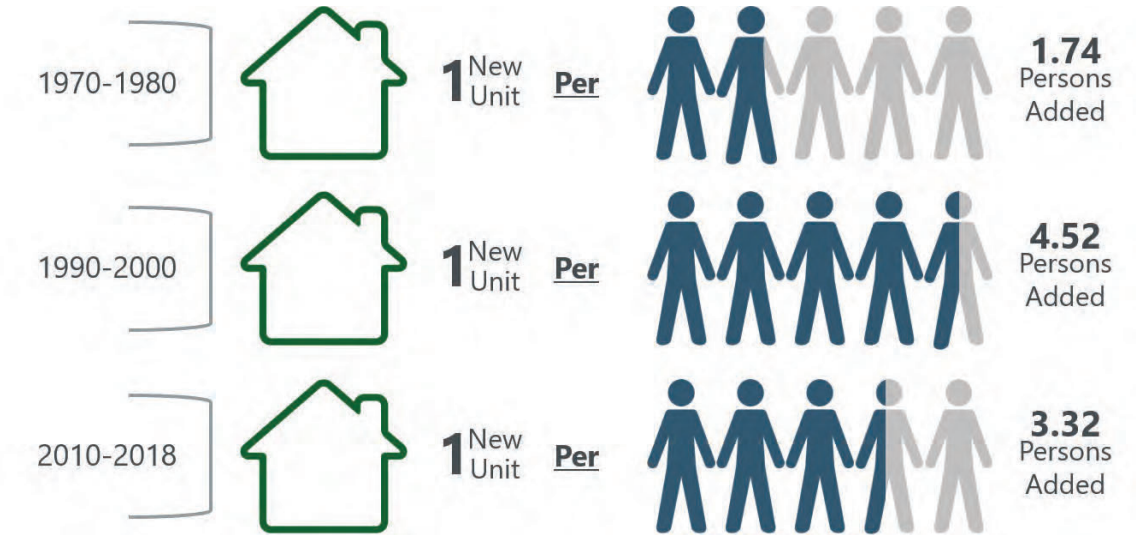
Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.



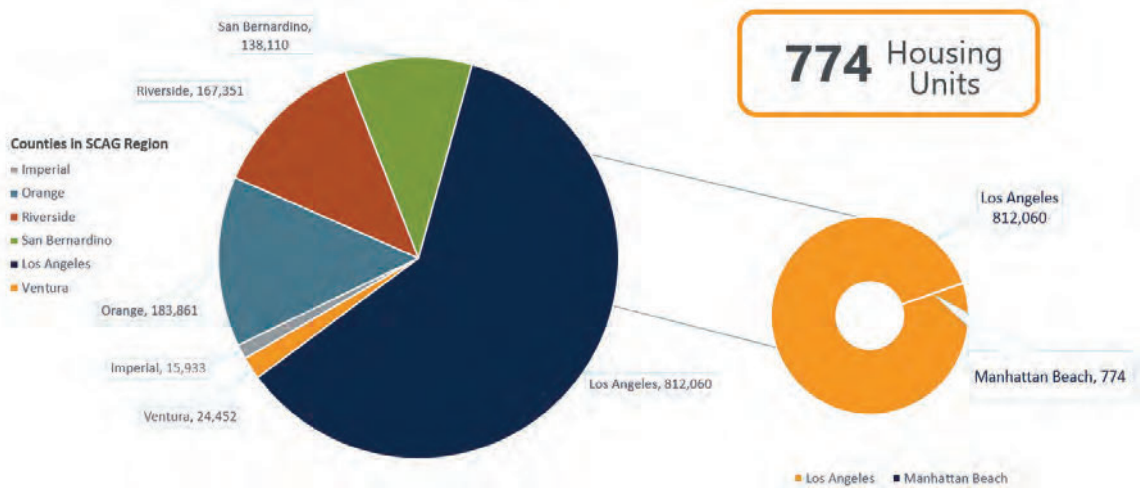
What does the data show?



What does the data show?



How many housing units does Manhattan Beach have to plan for?



5th Cycle RHNA Progress
Data Reported 2014-2020



Income Level	4th Cycle (2005-2013) RHNA	5th Cycle (2013-2021) RHNA	6th Cycle (2021-2029) RHNA	Permitted Since 2014
Very-Low	236	10	322	0
Low	149	6	165	0
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Above Moderate	350	15	132	419
Total	895	38	774	419

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

Framing Our Policies

Step 1: Review of 5th 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*

Framing Our Policies

Step 2: Development of new policies for 6th 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
Total	-	-	-	**2.77**	-	**53**

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
Total Net-New-Units	112
Total Capacity Deficit (–)	**-375**
Capacity Deficit – acreage	18.75

Very-low: 322
Low: 165

Underutilized sites
CG Zone: 59 acres
PD Zone: 21 acres

Zoning Map





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)

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

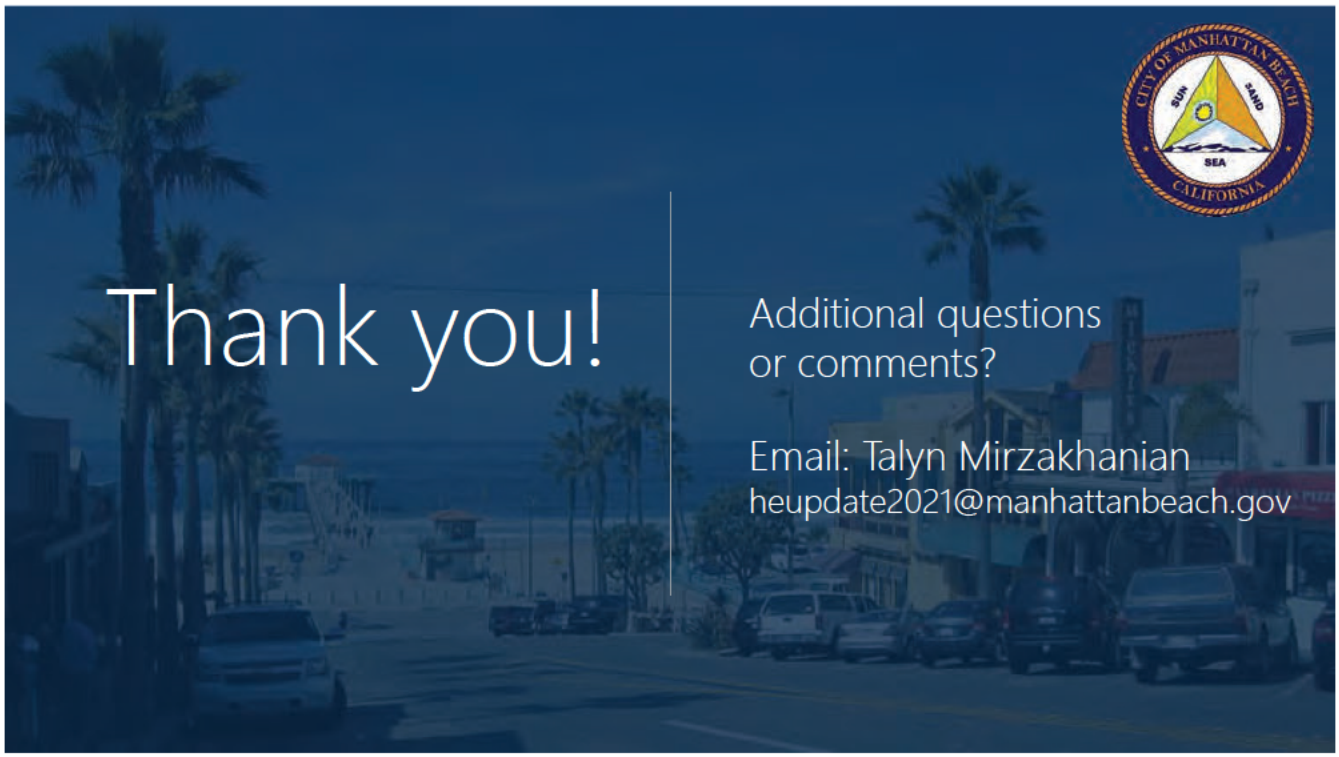
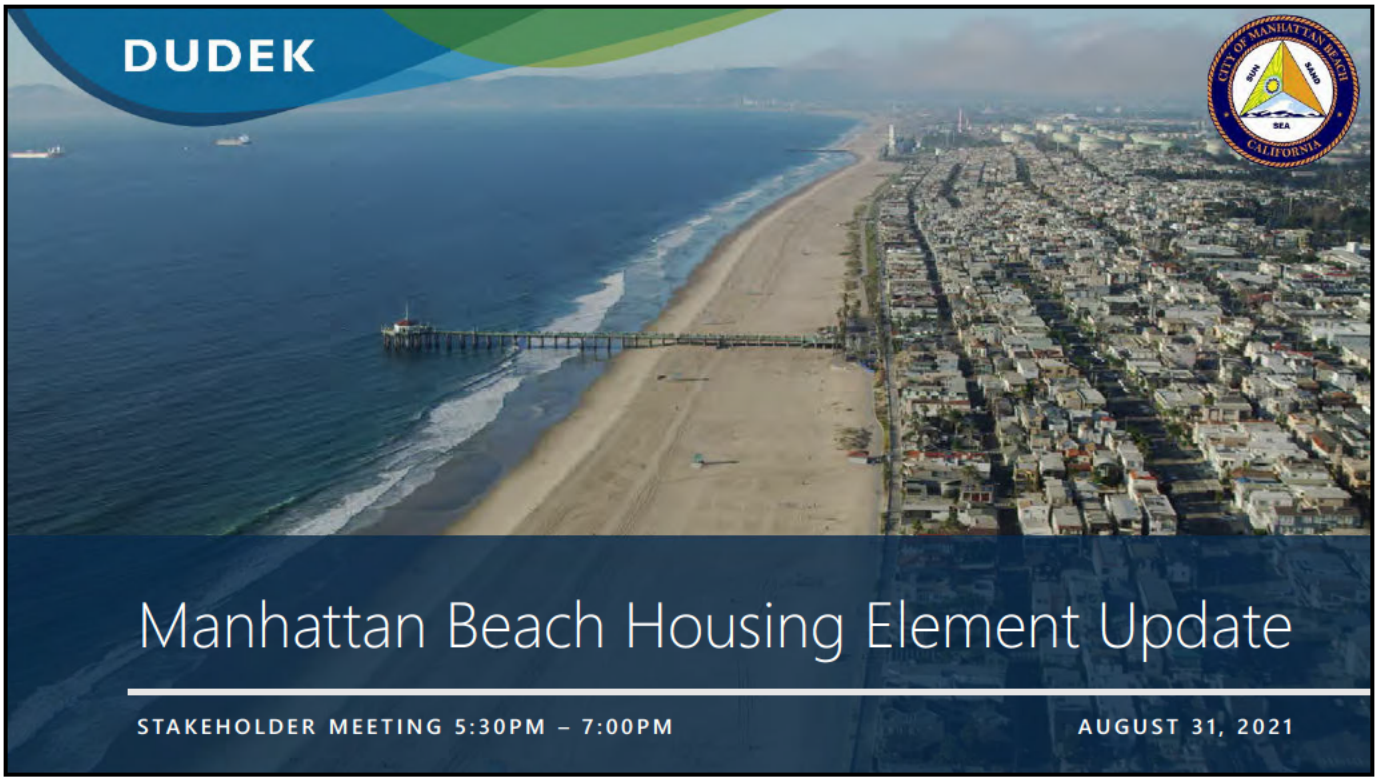


EXHIBIT C



1

Overview

01 Zoom Overview

02 Project Overview

03 Barriers to Development

04 Policy Framework

05 Next Steps

06 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.

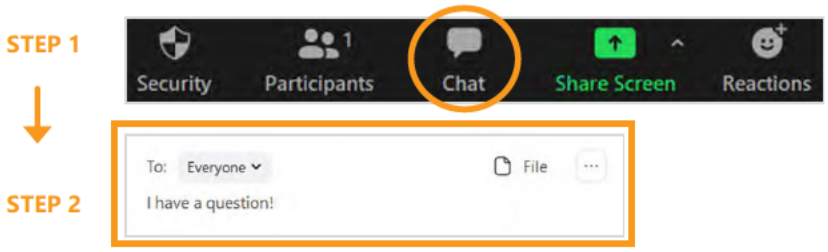
If you have issues using Zoom software please use the **Chat** tool for technical help.

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.



5

5

Before we get started

What is your favorite aspect of living in Manhattan Beach?

6

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02 Project Overview

7

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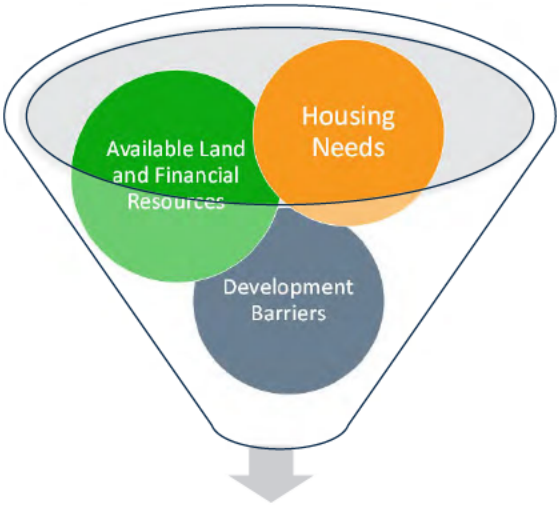
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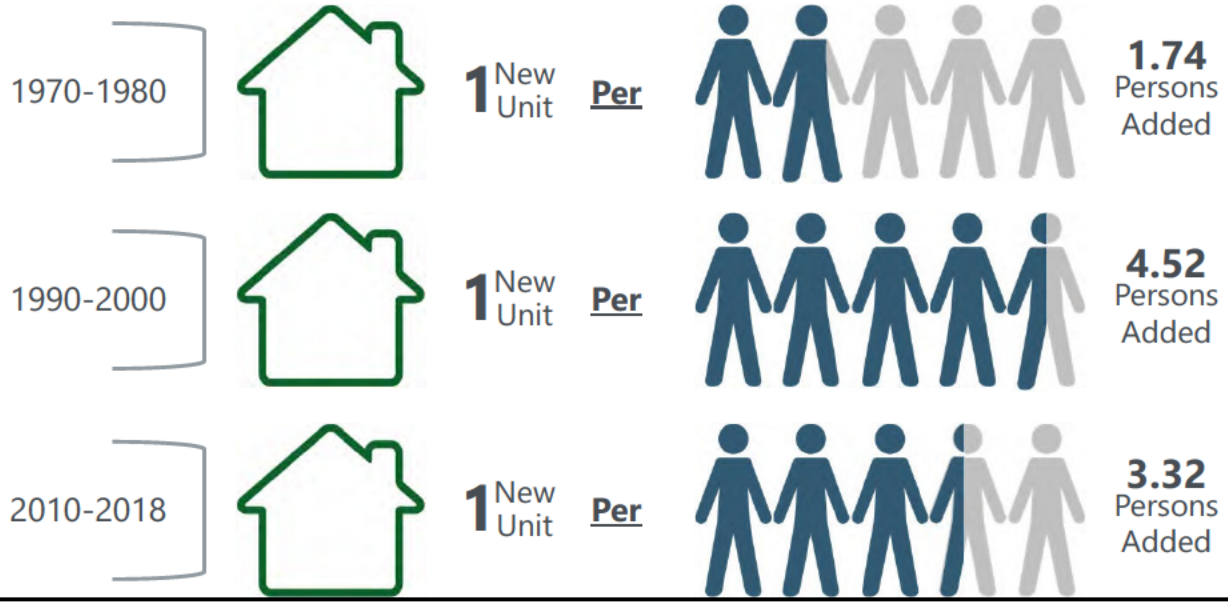


Housing Action Plan

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What does the data show?



10

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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

11

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2021 Income Limits

Los Angeles County Area Median Income (AMI): $80,000*

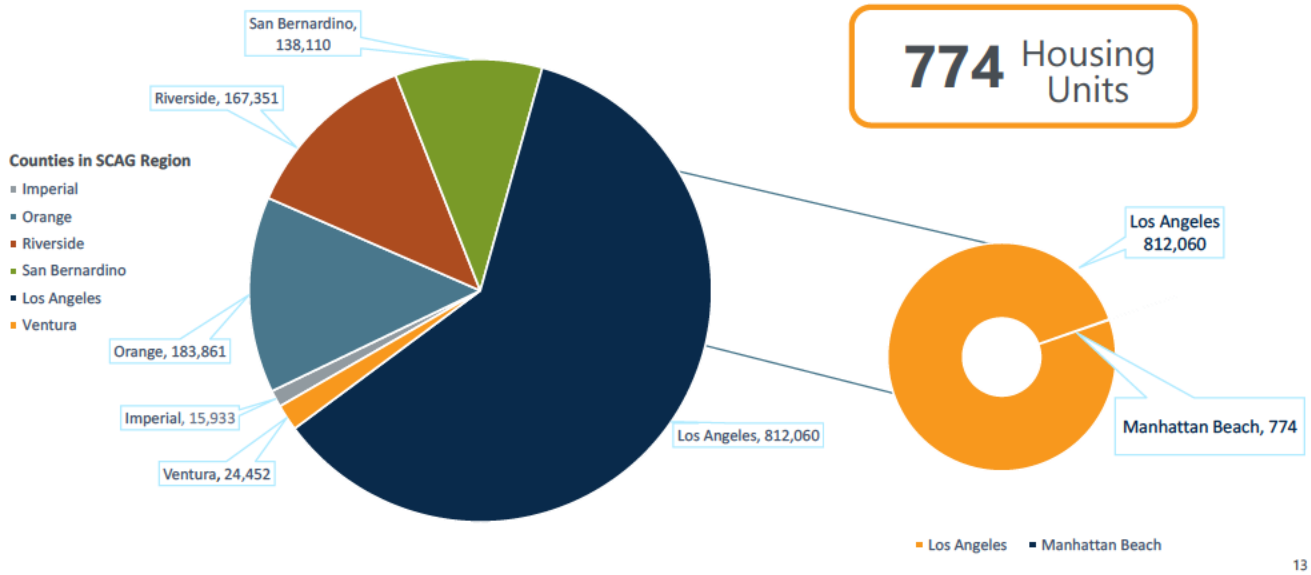
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12

12

How many housing units does Manhattan Beach have to plan for?



13

13

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14

14

Housing Element Components



15

03 Barriers to Development

16

What are the barriers to development?

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- Site Improvements

Market



- Land Costs
- Availability of Vacant Land
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Environmental & Infrastructure



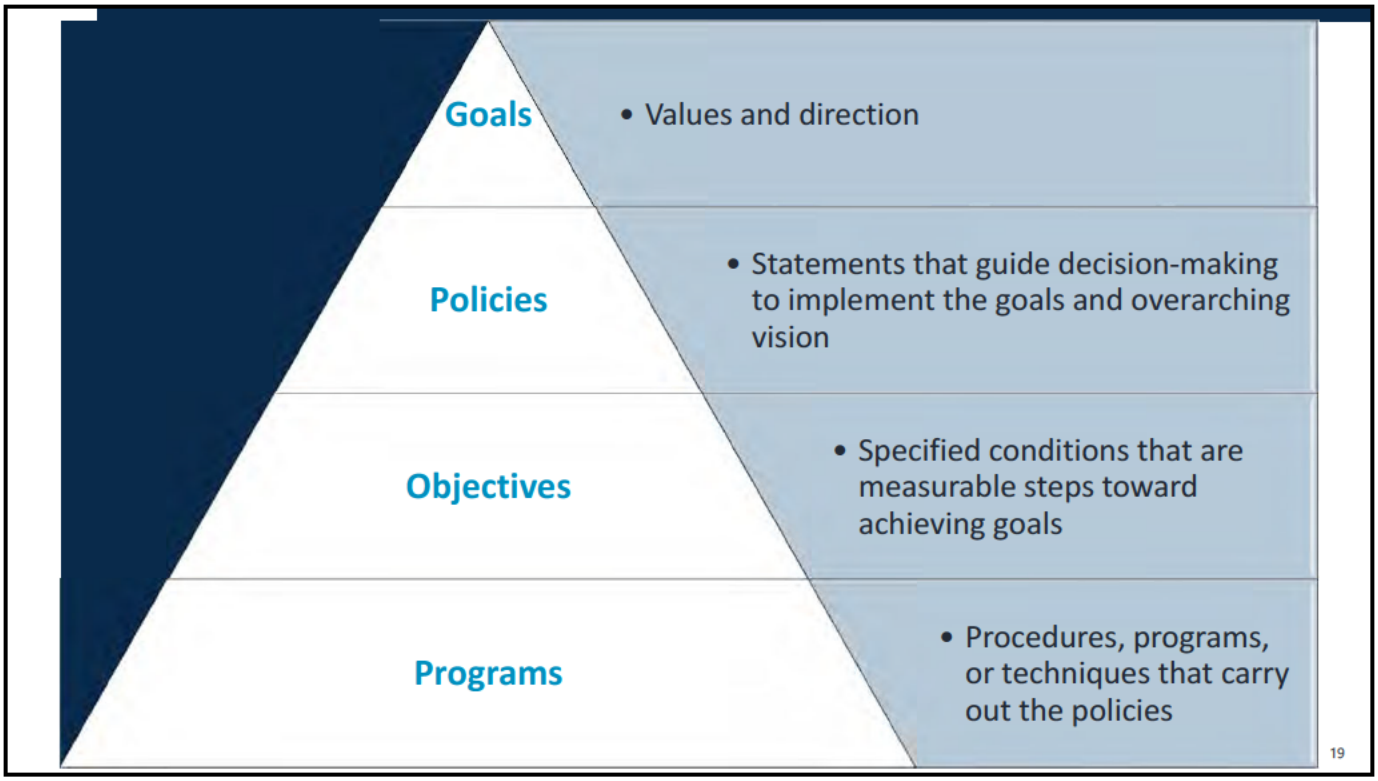
- Geological Hazards
- Flood & Fire Hazards
- Water Supply and Service
- Sewer Service

17

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04 Policy Framework

18


Goals
• Values and direction
Policies
• Statements that guide decision-making to implement the goals and overarching vision
Objectives
• Specified conditions that are measurable steps toward achieving goals
Programs
• Procedures, programs, or techniques that carry out the policies
19

19


Framing Our Policies
Housing Policy Considerations
Produce a Diverse Range of Housing Types to Align with the Local Need
Improve and Preserve Housing for All Income Levels
Increase Access to Quality Housing
Prevent Displacement and Enhance Quality of Life
20

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



06 Next Steps

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
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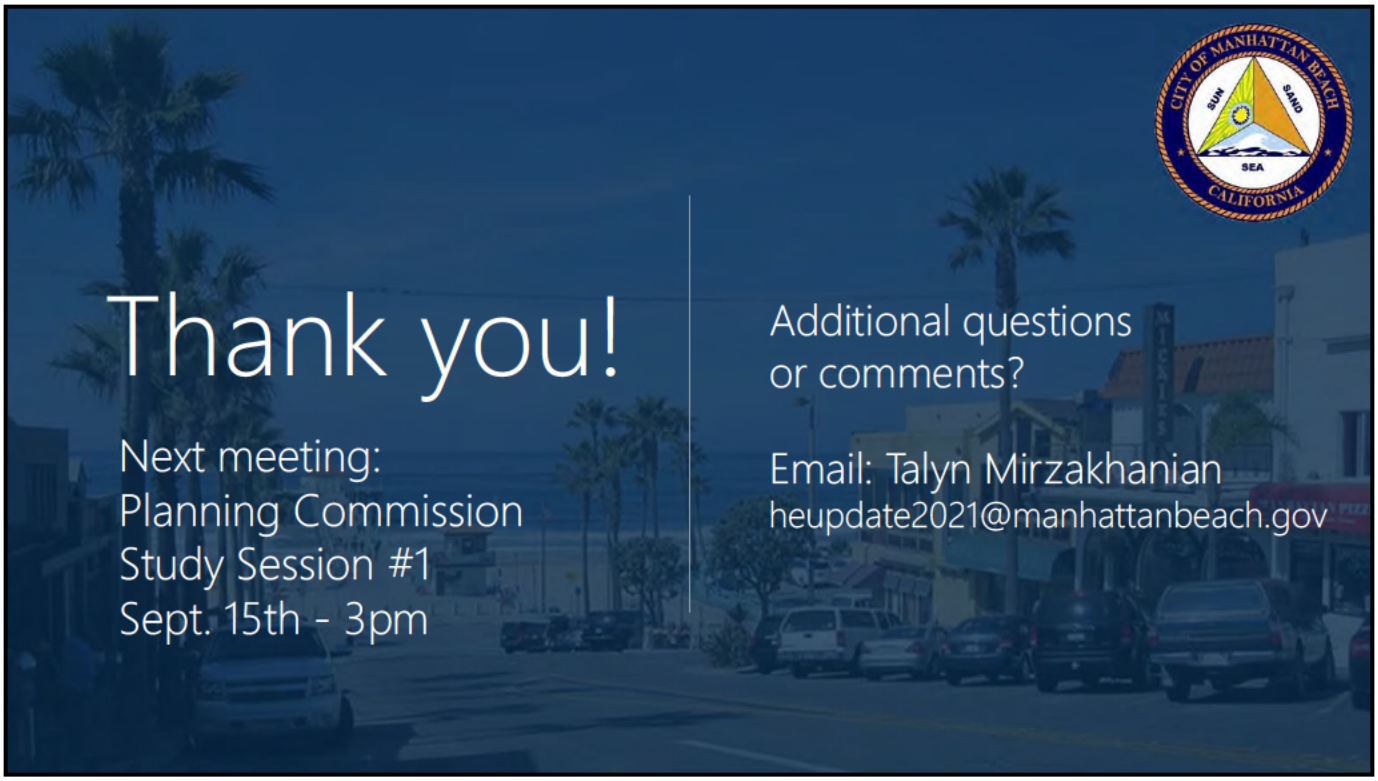

Thank you!
Next meeting:
Planning Commission
Study Session #1
Sept. 15th - 3pm
Additional questions
or comments?
Email: Talyn Mirzakhanian
heupdate2021@manhattanbeach.gov

EXHIBIT D

Poll Report

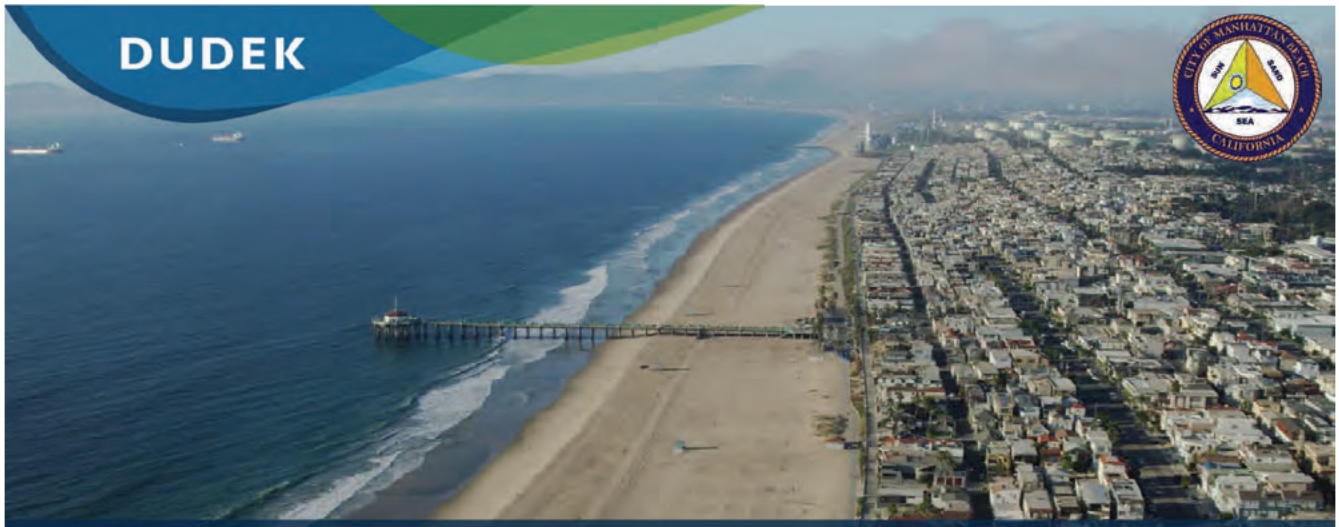
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Webinar ID	Actual Start Time	Actual Duration (minutes)	Topic
920 6696 8694	8/31/2021 17:10	93	Manhattan Beach Housing Element Stakeholder Meeting

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@esrour.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@esrour.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
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22	JULIE TOMANPOS	Julie@southbayaor.com	8/31/2021 17:58	What is your top priority for new housing?	Ownership options

EXHIBIT E



Manhattan Beach Housing Element Update

PLANNING COMMISSION MEETING 3:00PM

SEPTEMBER 15, 2021

Overview

01 Project Overview

02 Barriers to Development

03 Policy Framework

04 Sites Analysis

05 Next Steps

06 Discussion and Q & A

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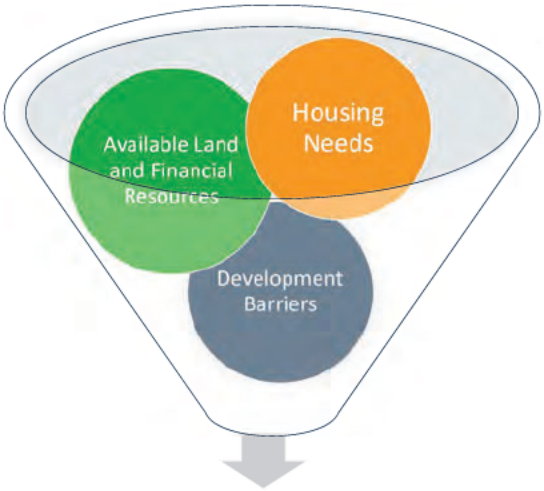
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- Identify programs and actions to meet the needs
- Identify sites available for housing
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Remember - Neither the City, County, nor private landowners are required to build the number of units planned for in the Housing Element.



Housing Action Plan

What does the data show?



Changing Population

- Changing Needs
- Older adults



Affordability

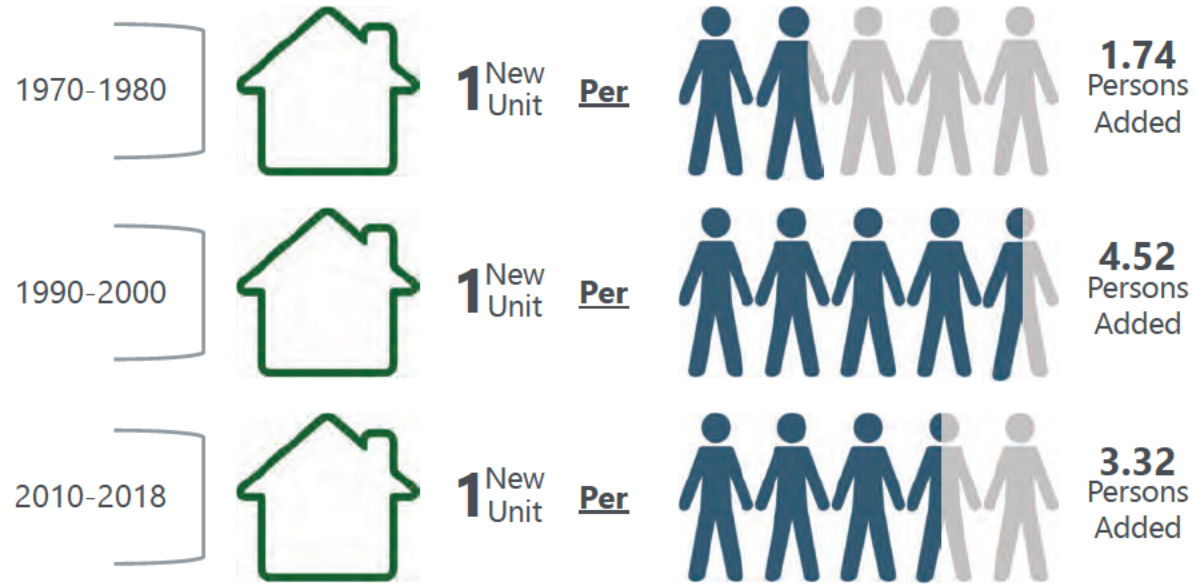
- Housing Overpayment
- Median Sale Price



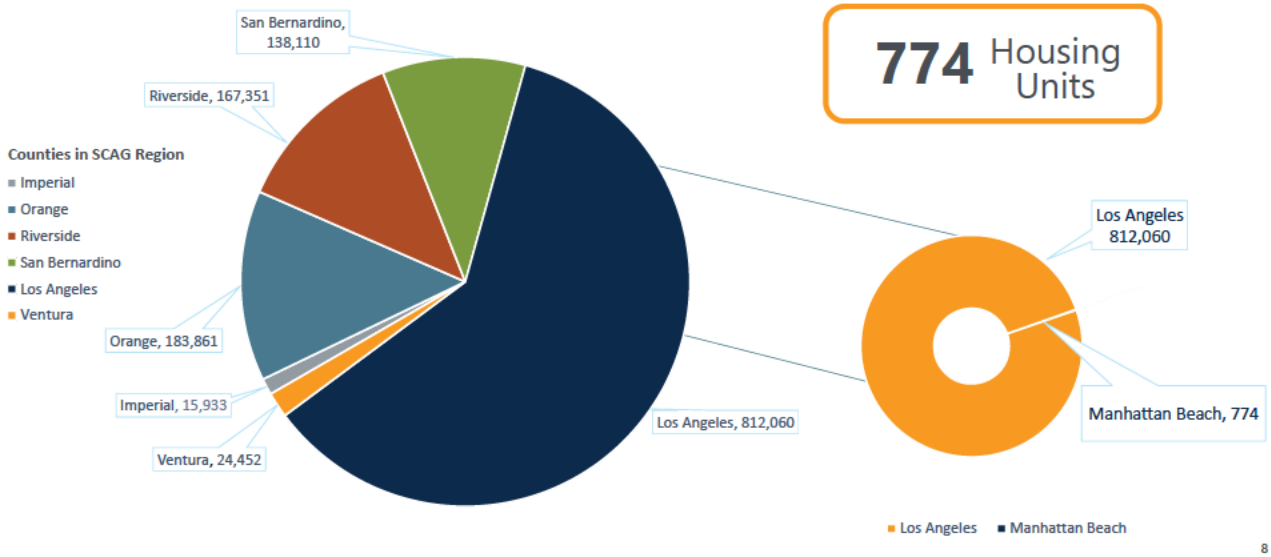
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Environmental & Infrastructure



- Geological Hazards
- Flood & Fire Hazards
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- Sewer Service

Framing Our Policies

Step 1: Review of 5th 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*

Framing Our Policies

Step 2: Development of new policies for 6th 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 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)

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
Total	-	-	-	**2.77**	-	**53**

Opportunities for Additional Capacity



Capacity Analysis

Category	Lower-Income Units
RHNA	487
Pipeline Residential Development Credited Toward RHNA	9
Underutilized Site Capacity	53
Potential Accessory Dwelling Units	50
Total Net-New-Units	112
Total Capacity Deficit (–)	**-375**
Capacity Deficit – acreage	18.75

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.

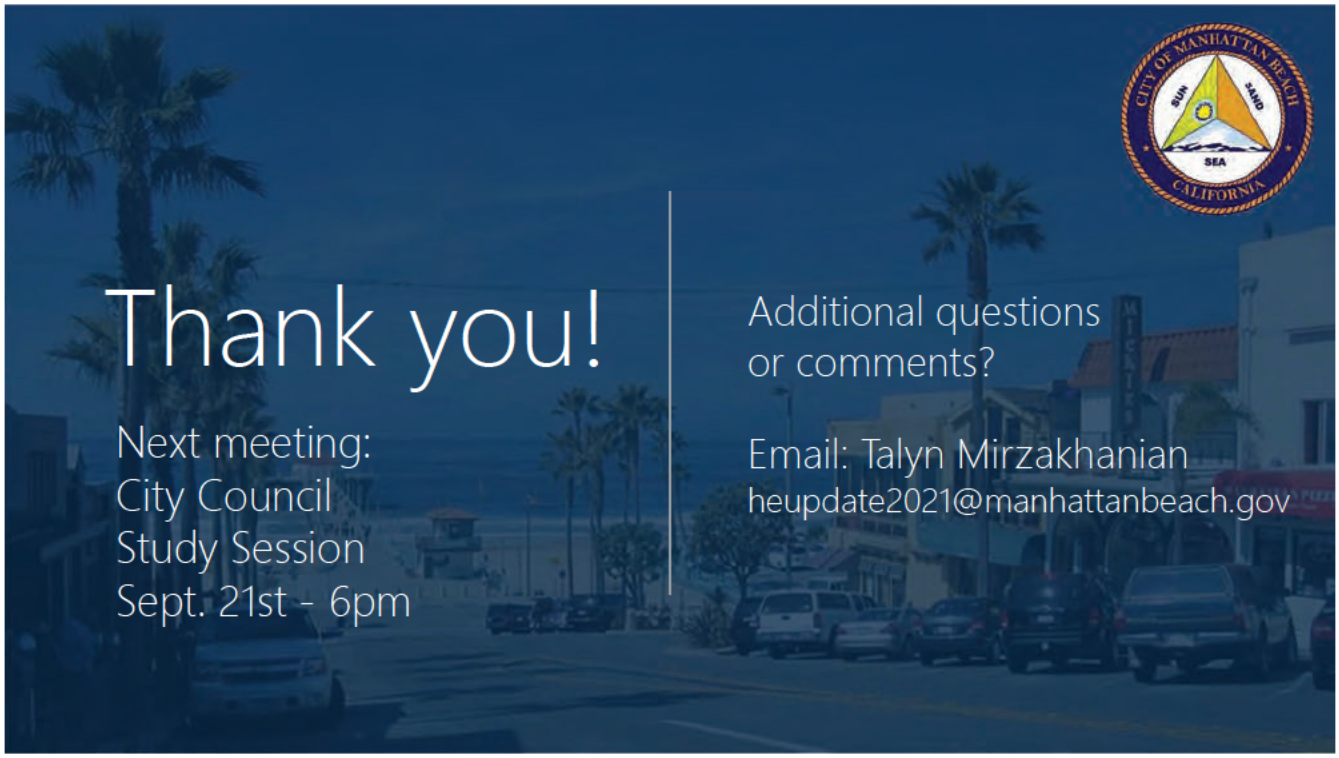
iii. Permit a minimum of 20 dwelling units per acre.

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)

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

OPEN DISCUSSION AND Q & A



Thank you!

Next meeting:
City Council
Study Session
Sept. 21st - 6pm

Additional questions
or comments?

Email: Talyn Mirzakhanian
heupdate2021@manhattanbeach.gov

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

or view our webpage for updates and information:

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 Mirzakhanian <tmirzakhanian@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

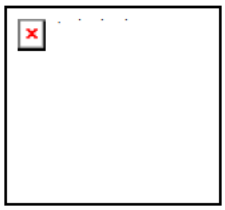
CAUTION: This Email is from an EXTERNAL source. Ensure you trust this sender before clicking on any links or attachments.

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

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:

5	4170006023 4170006019 4170006018 4170006017 4170006022 4170006015 4170006028 4170006027 4170006013	5	CG	2	1.15	21	Stand-alone shipping and mailing store with surface parking (APN 4170006019, LTI ratio 0.25, 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 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

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, 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, 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.