
Addendum

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

SEPTEMBER 2022

Prepared for:

CITY OF MANHATTAN BEACH

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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 6 th 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 through 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 units¹ 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.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ 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.

September 15, 2022

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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, liquefaction, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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:			<input checked="" type="checkbox"/>	
v) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
vi) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
viii) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 applicable 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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, natural 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

City of Manhattan Beach. 2014. City of Manhattan Beach Housing Element 2013-2021. February 2014.
Accessed September 11, 2022.

<https://www.manhattanbeach.gov/home/showpublisheddocument/16921/635434710882970000//>.

City of Manhattan Beach. 2022. City of Manhattan Beach 6th Cycle Housing Element. August 2022. Accessed
September 5, 2022. <https://www.manhattanbeach.gov/home/showpublisheddocument/50649/637955913884070000>.

HCD (California Department of Housing and Community Development). 2021. Affirmatively Furthering Fair
Housing: Guidance for All Public Entities and for Housing Elements. April 2021 Update. Accessed
September 5, 2022. https://www.hcd.ca.gov/community-development/affh/docs/AFFH_Document_Final_4-27-2021.pdf

4.2 List of Preparers

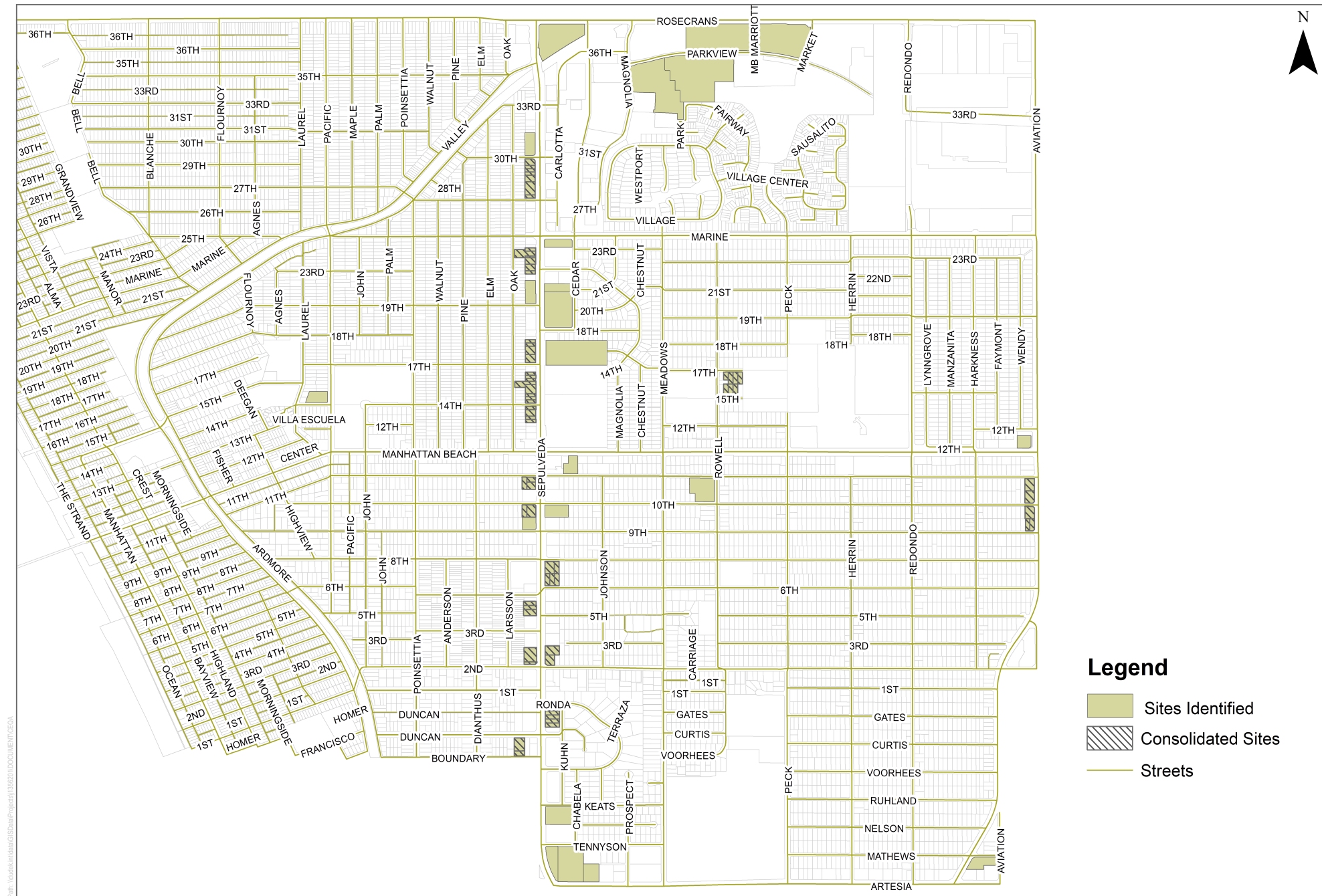
City of Manhattan Beach

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

Appendix A

HCD Review Letter (June 3, 2022)

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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Sacramento, CA 95833
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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,

A handwritten signature in blue ink, appearing to read "Paul McDougall", with a stylized flourish at the end.

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.