

April 10, 2021

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

Re: Housing Element

Dear Mayor Brand, City Council Members and Planning Staff,

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

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

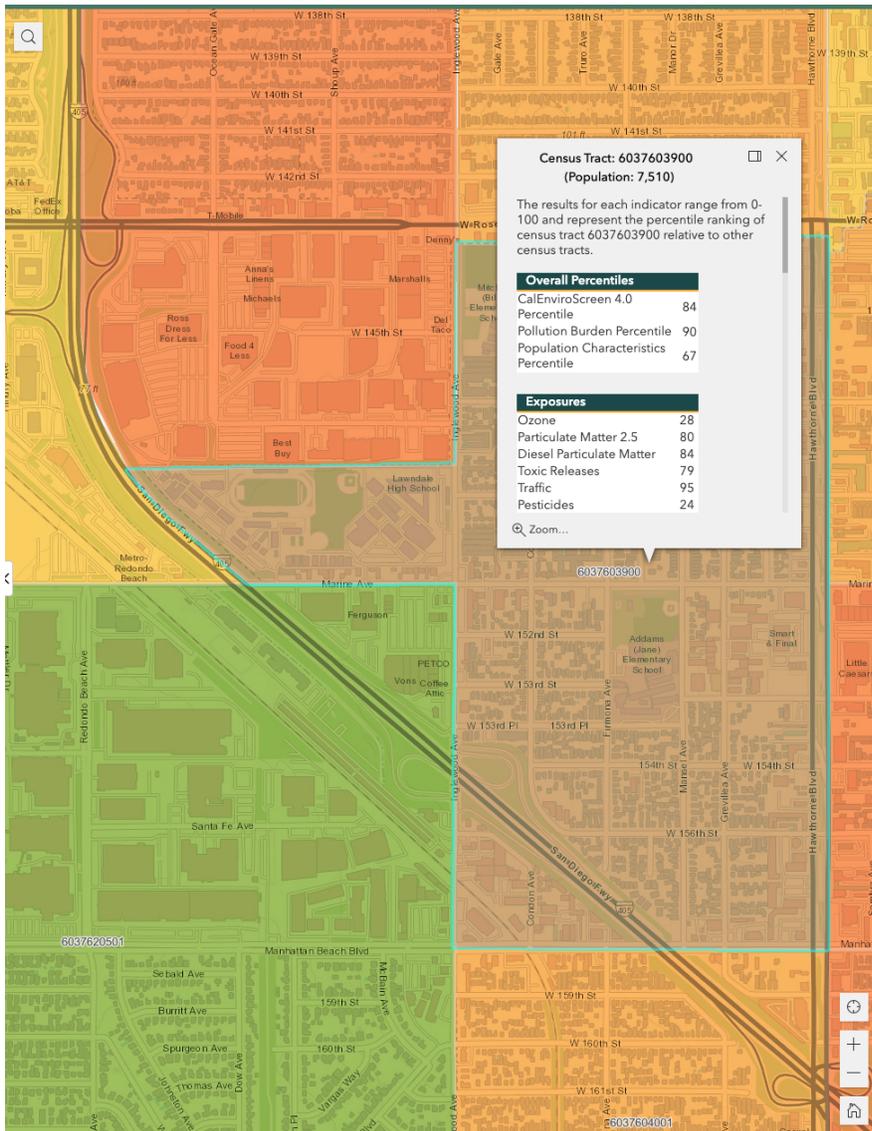
California and Federal Fair Housing and Disparate Impacts laws were settled well before 2020. The US Supreme Court ruled on Disparate Impacts in 2015, and HUD has provided guidance to cities repeatedly, including [this plain English summary](#) published in September 2020¹. Likewise, California's HCD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

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

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

² Housing Element Site Inventory Guidebook Government Code Section 65583.2

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



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

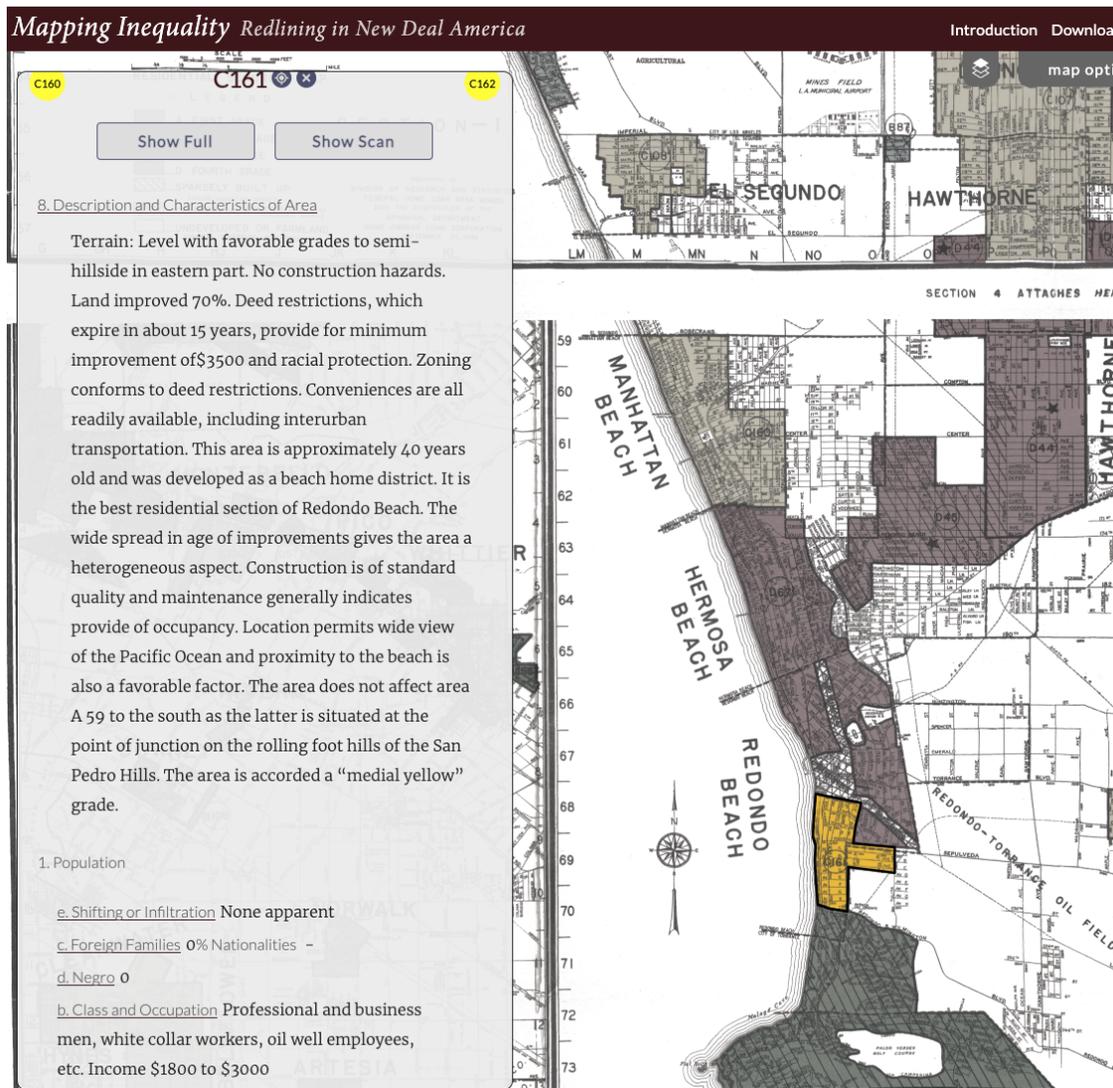
The Housing Overlay in the NE corner of RB (6205.01) is surrounded by 6039.00 and the I-405 freeway. It's true pollution burden is expected to be at least as high as 6039.00's.

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

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

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

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



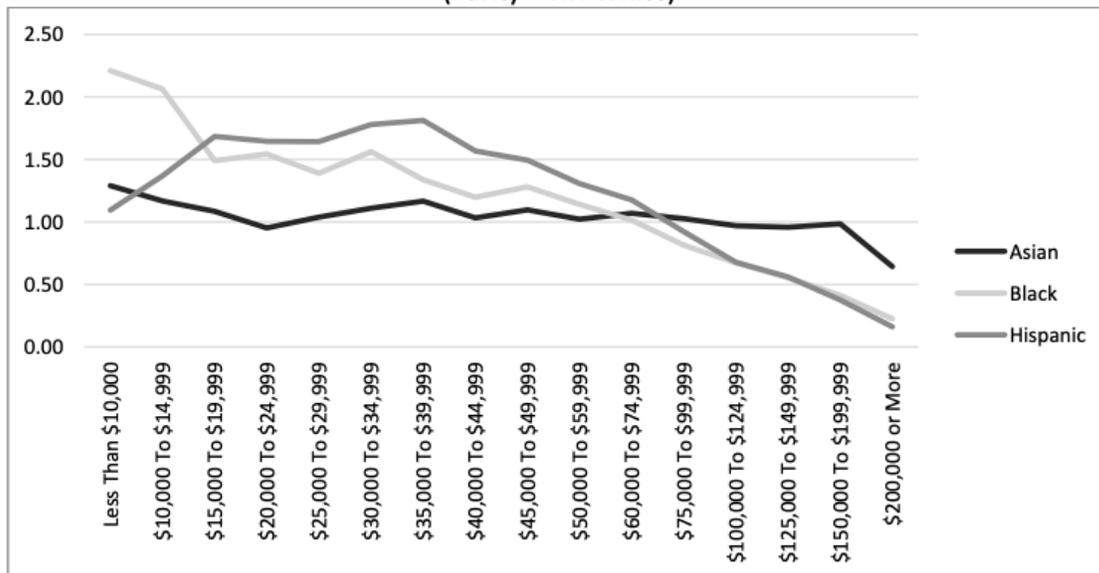
In the century since this map was published, Riviera Village has slowly evolved from 100% nonhispanic white to 75%, compared to 47-62% in North RB and 26.1% for LA County overall.

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

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

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

Figure 5. Parity Index of Household Income by Race/Ethnicity in LA County, 2010-2014
(Parity = NH White)



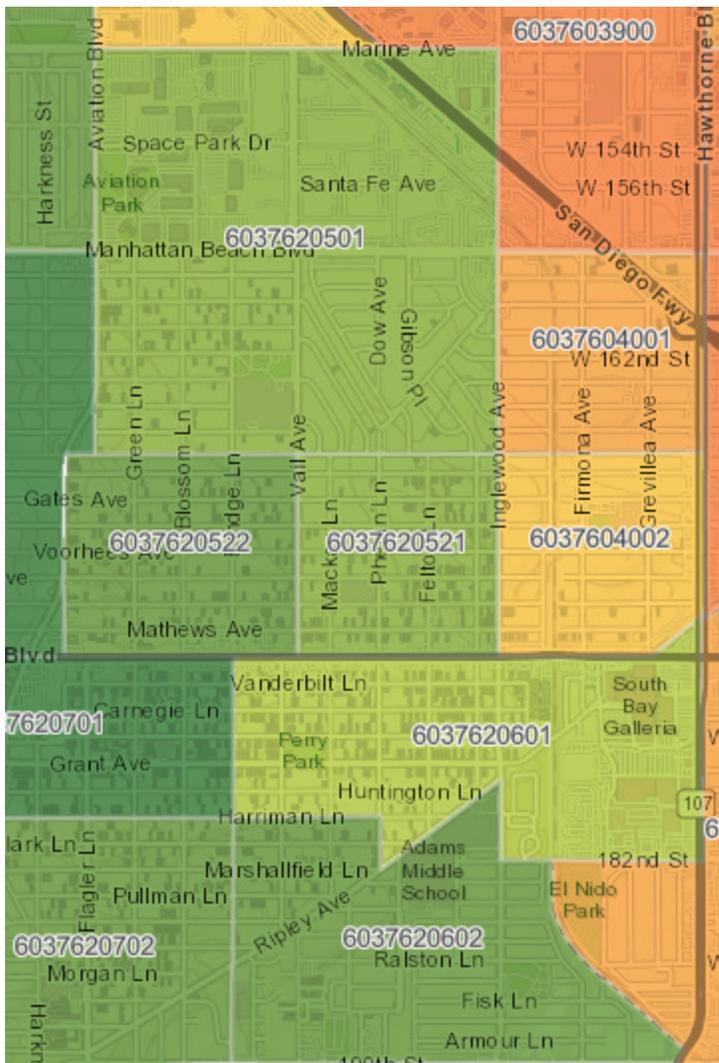
Source: 2010-14 ACS

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

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

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

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



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

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

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

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

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

Jorge De la Roca, Richard K Green, Marlon G. Boarnet; Cityscape: A Journal of Policy Development and Research, 2021

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

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

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

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

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

Grace Peng, PhD
6205.22 Resident

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

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