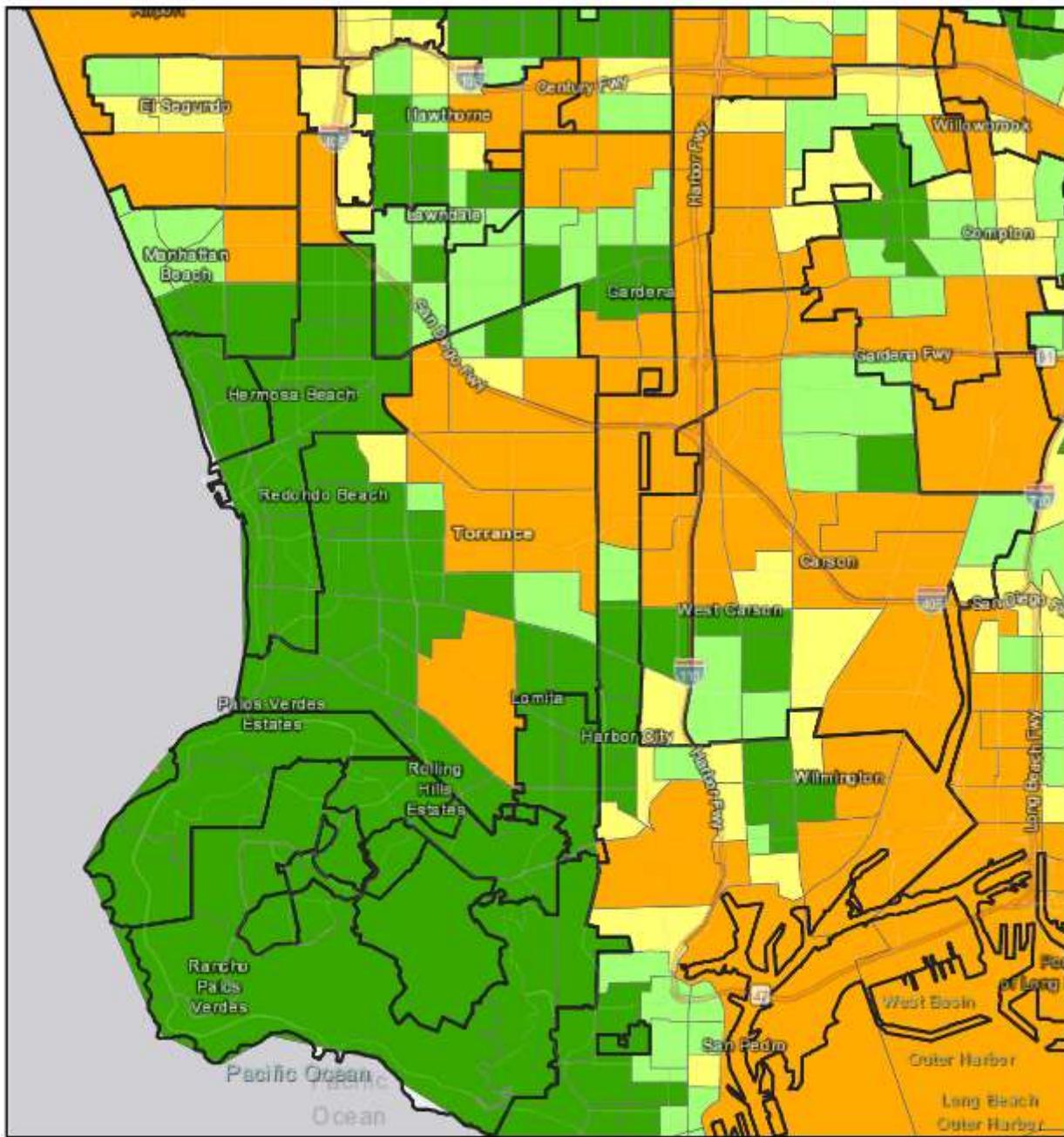


Figure D-22: TCAC Opportunity Areas - Environmental Scores



Source: HCD Data Viewer, TCAC Opportunity Maps, 2021

City of Torrance, County of Los Angeles, Bureau of Land Management, EPA, HCD, Comex, USGS, EPA, NPS, Esri, HERE, OpenStreetMap contributors, and the GIS user community

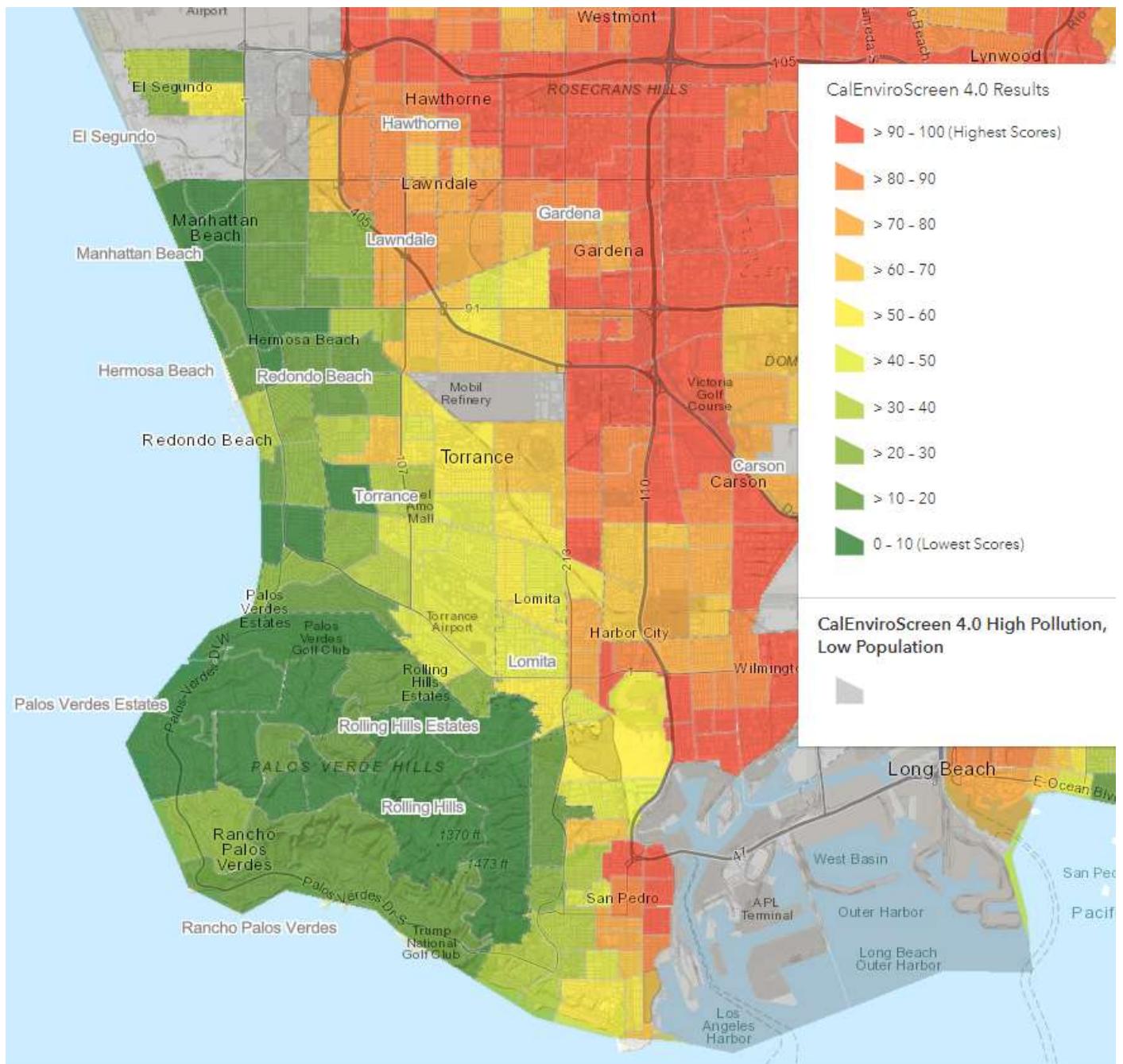
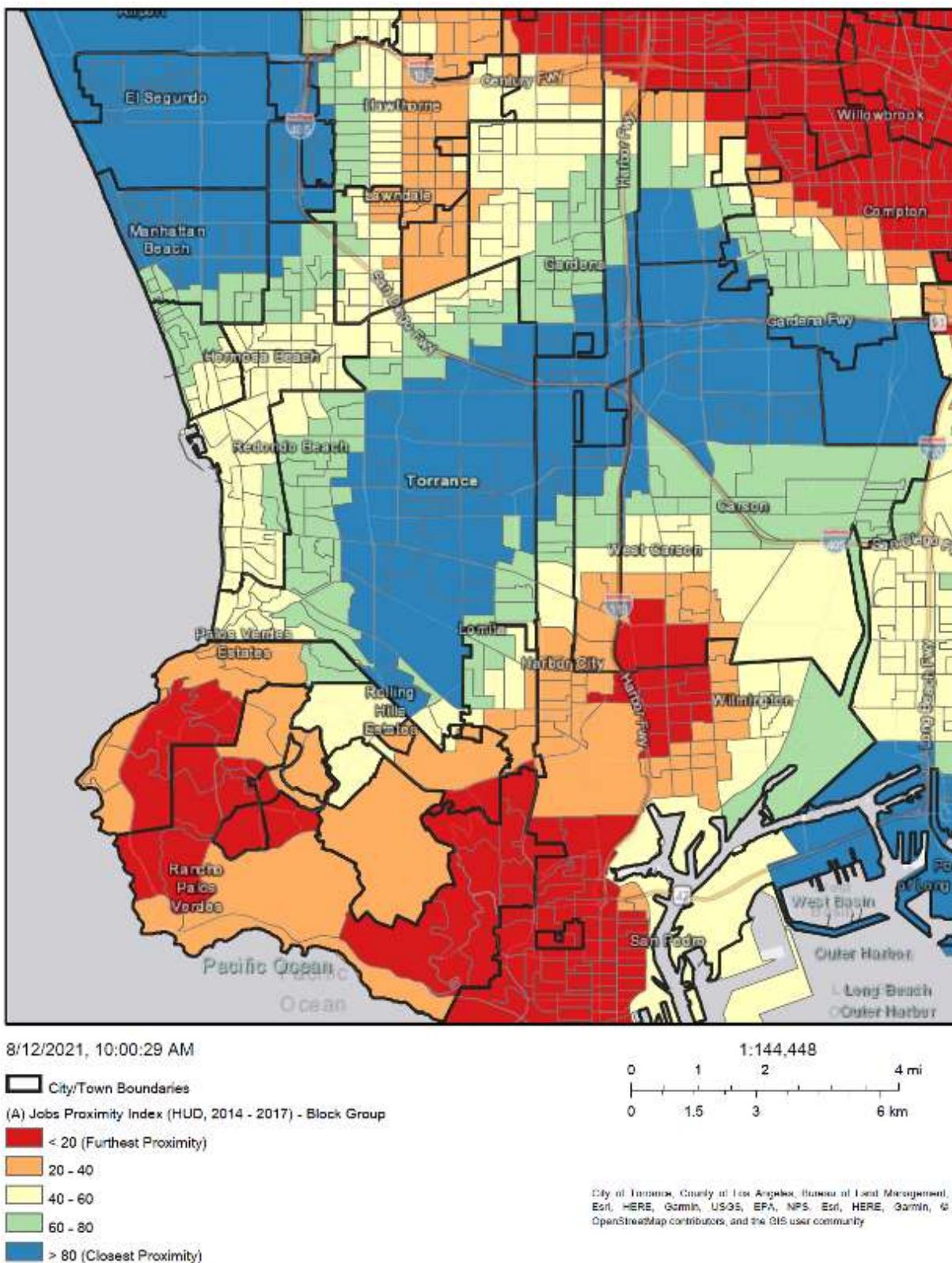
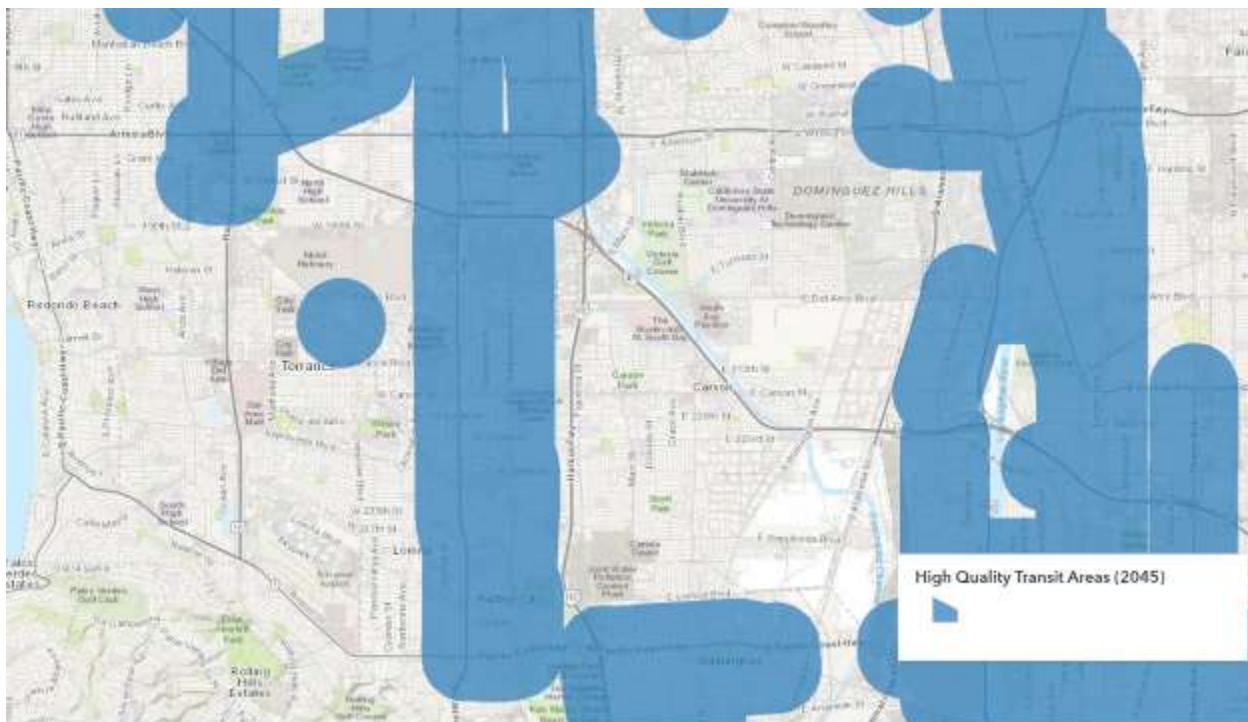
Figure D-23: CalEnviroScreen 4.0

Figure D-24: Jobs Proximity Index by Block Group

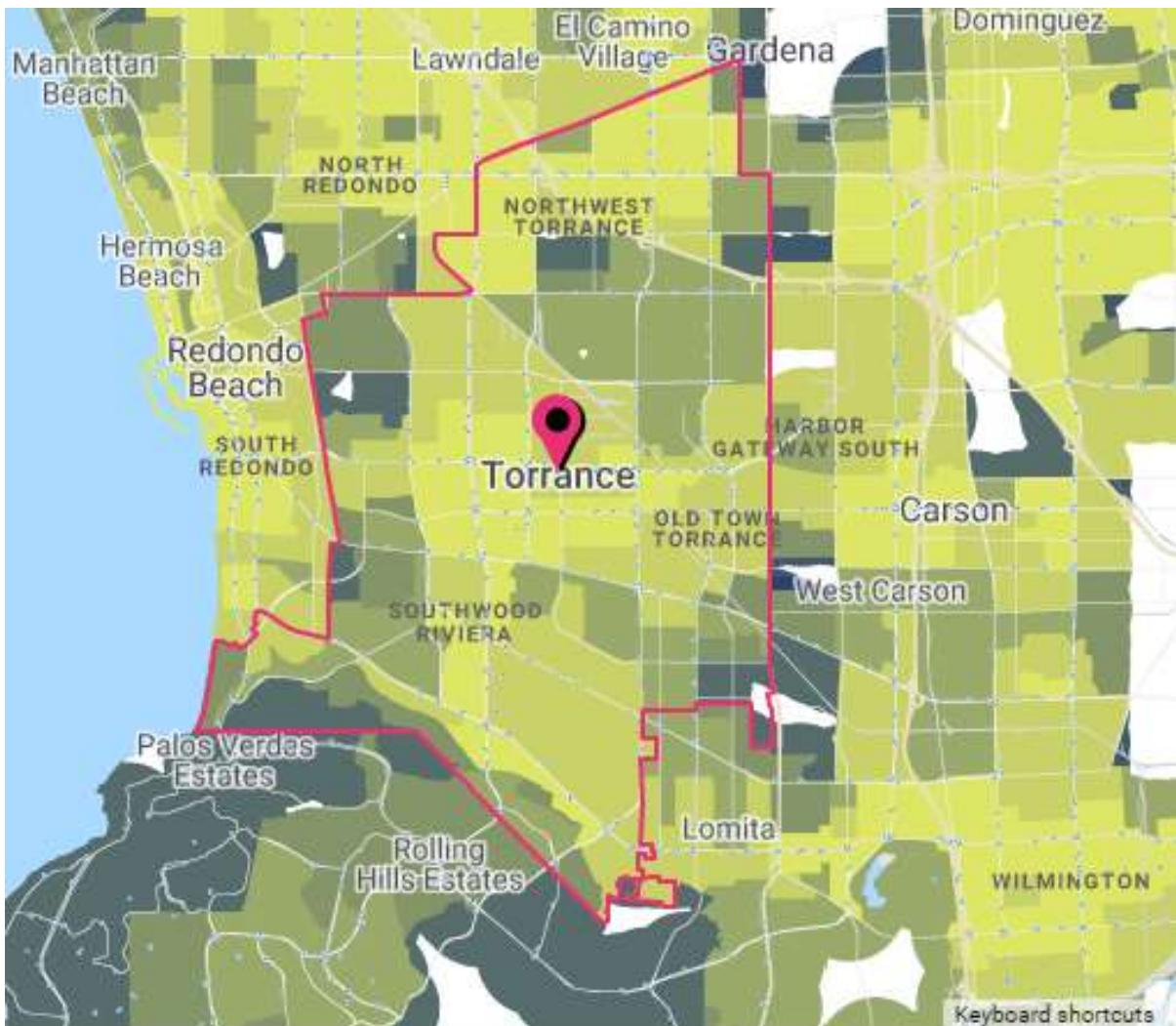


Source: HCD Data Viewer, HUD Opportunity Indices, 2021.

Figure D-25: High Quality Transit Areas (HQTA)

Source: Southern California Association of Governments (SCAG) 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), 2021.

Figure D-26: All-Transit Performance Score



D.2.5 Disproportionate Housing Needs

Housing problems for Torrance were calculated using HUD's 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS. Table D-18 breaks down households by race and ethnicity and presence of housing problems for Torrance and Los Angeles County households. The following conditions are considered housing problems:

- Substandard Housing (incomplete plumbing or kitchen facilities)
- Overcrowding (more than 1 person per room)
- Cost burden (housing costs greater than 30%)

In Torrance, 29.8% of owner-occupied households and 53.9% of renter-occupied households have one or more housing problem. The city had a slightly lower proportion of households with a housing problem compared to the county, where 39.9% of owner-occupied households and 62.3% of renter-occupied households experience a housing problem. In Torrance, non-White owner-occupied households generally experience higher rates of housing problems than White owner-occupied households. In renter-occupied households, more than half of Asian, Pacific Islander, and Hispanic households experienced a housing problem. In both Torrance and the county, renter-occupied households tend to experience housing problems at a higher rate, with the exception of “Other” households in Torrance.

Table D-18: Housing Problems by Race/Ethnicity

Race/Ethnicity	Torrance		Los Angeles County	
	Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied
White	29.0%	50.2%	32.1%	52.6%
Black	69.0%	49.3%	41.5%	63.7%
Asian	30.4%	56.8%	38.3%	56.3%
American Indian	17.6%	34.5%	39.7%	56.4%
Pacific Islander	--	78.1%	39.7%	55.5%
Hispanic	28.8%	60.0%	48.2%	71.1%
Other	35.3%	3.0%	36.5%	55.7%
All	29.8%	53.9%	38.9%	62.3%

Sources: HUD CHAS Data (based on 2013-2017 ACS), 2021.

Cost Burden

Cost burden by tenure based on HUD CHAS data is shown in Table D-19. For owner-occupied households, a higher percentage of Black households (over 60 percent) are cost burdened. However, Black households make up a small portion of the total owner-occupied households in the city. While a smaller percentage of Asian owner-occupied households are cost burdened (27 percent) compared to Black households, these make up a much larger portion of the owner-occupied households in Torrance.

For renter-occupied households, a higher percentage (78 percent) of Pacific Islander households are cost burden. However, these also make up a minor portion of the overall renter-occupied households

in the city. While a lower percent of Asian (45 percent) and Hispanic (48 percent) renter-occupied households have a cost burden, these populations make up a much larger portion of renter-occupied households in Torrance.

Figures D-27 (A) through (D) compare overpayment by tenure over time using the 2010-2014 and 2015-2019 ACS. The proportion of overpaying homeowners has lowered somewhat over these time periods. Currently, 20% to 60% of owners in most tracts in the City are cost burdened, with more overpaying owners generally in the north and south boundaries of the city. Overpayment by renters has decreased overall, but in most of the city 40-60 percent of renters overpay.

Table D-19: Cost Burden by Race/Ethnicity

Race/Ethnicity	Cost Burden (>30%)	Severe Cost Burden (>50%)	Total Households
Owner-Occupied			
White, non-Hispanic	28.4%	12.1%	15,895
Black, non-Hispanic	61.9%	26.2%	210
Asian. Non-Hispanic	27.1%	12.0%	10,080
American Indian	16.5%	11.8%	85
Pacific Islander	0.0%	0.0%	35
Hispanic	25.1%	11.9%	2,985
Other	34.7%	4.1%	850
Renter-Occupied			
White, non-Hispanic	46.2%	24.3%	10,175
Black, non-Hispanic	46.2%	27.4%	1,115
Asian. Non-Hispanic	44.8%	23.2%	7,975
American Indian	34.5%	6.9%	145
Pacific Islander	78.1%	12.5%	160
Hispanic	48.1%	22.6%	4,355
Other	34.1%	16.2%	835

Sources: HUD CHAS Data (based on 2013-2017 ACS), 2021.

Figure D-27(A): Overpaying Owners (2010-2014)

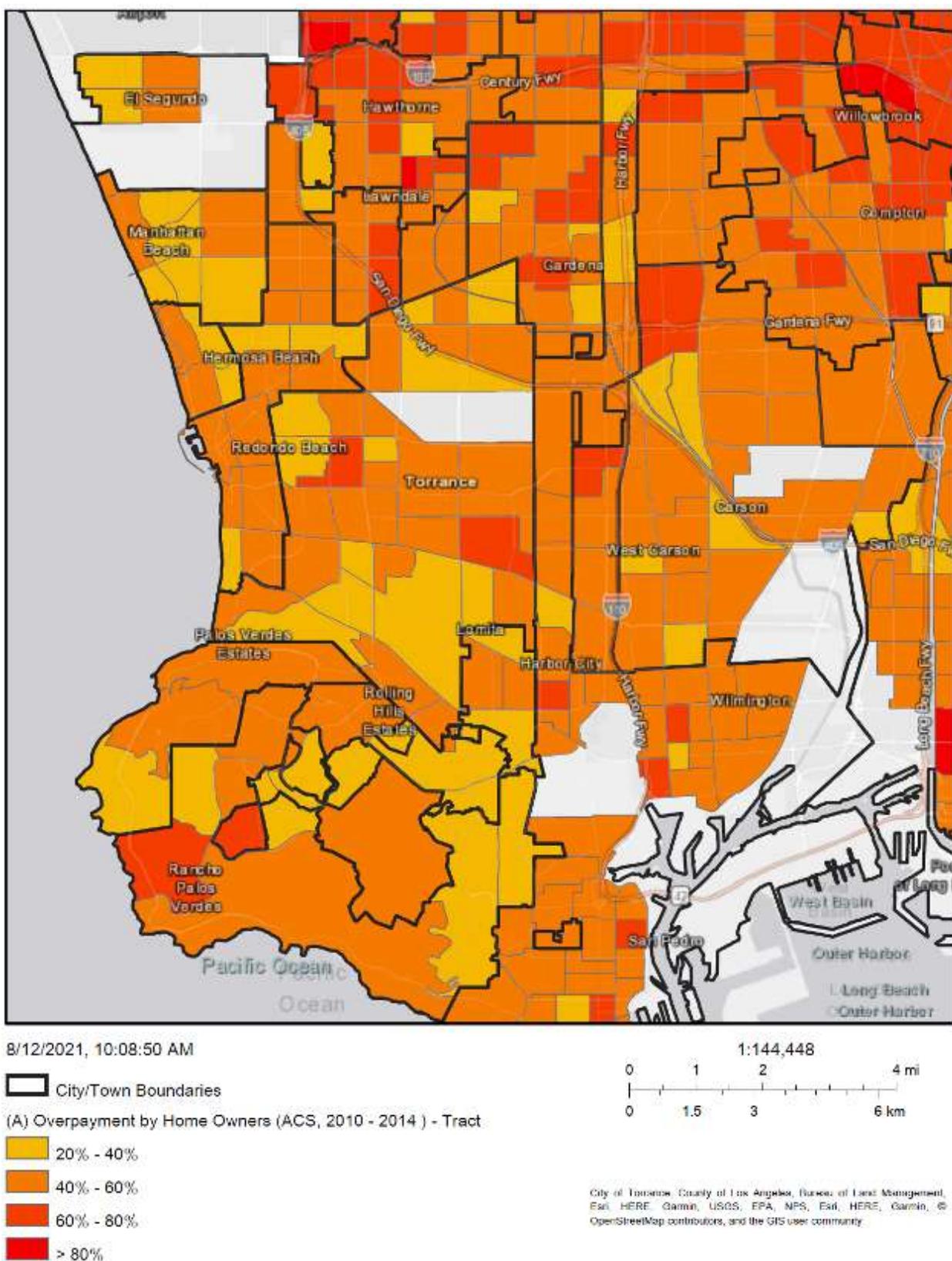
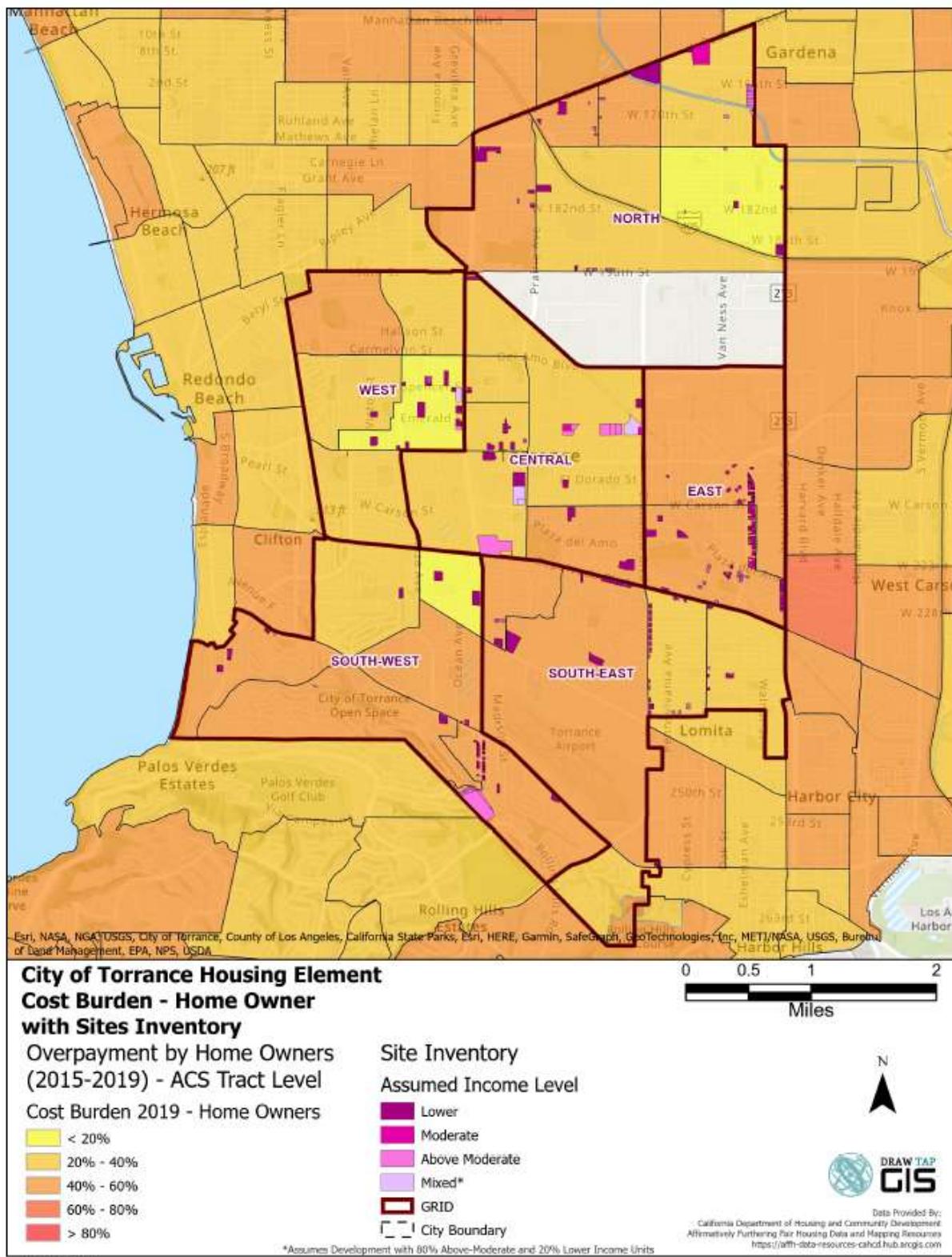
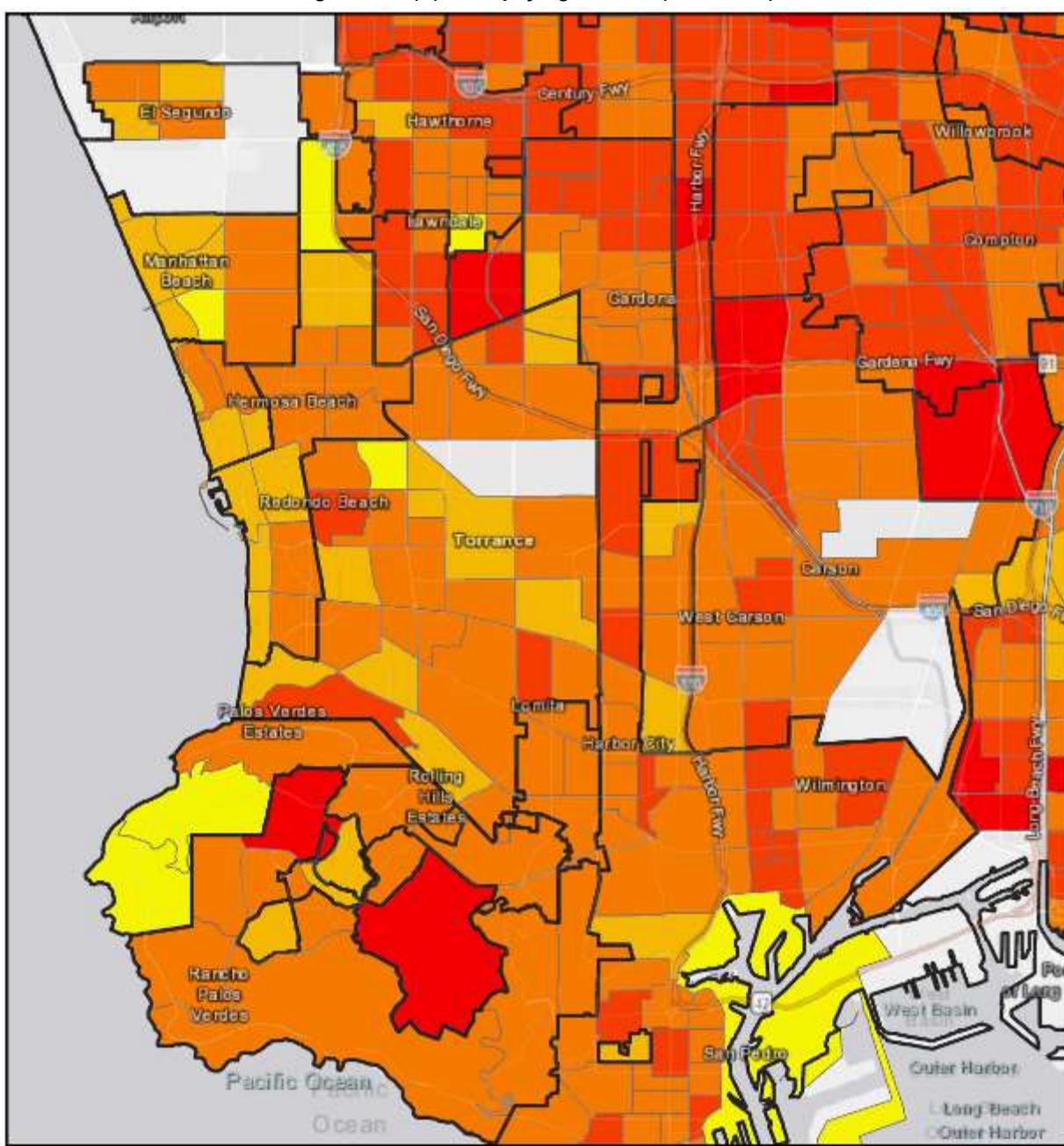


Figure D-27(B): Overpaying Owners (2015-2019)



Source: HCD Data Viewer, 2010-2014 and 2015-2019 ACS, 2022.

Figure D-27(C): Overpaying Renters (2010-2014)



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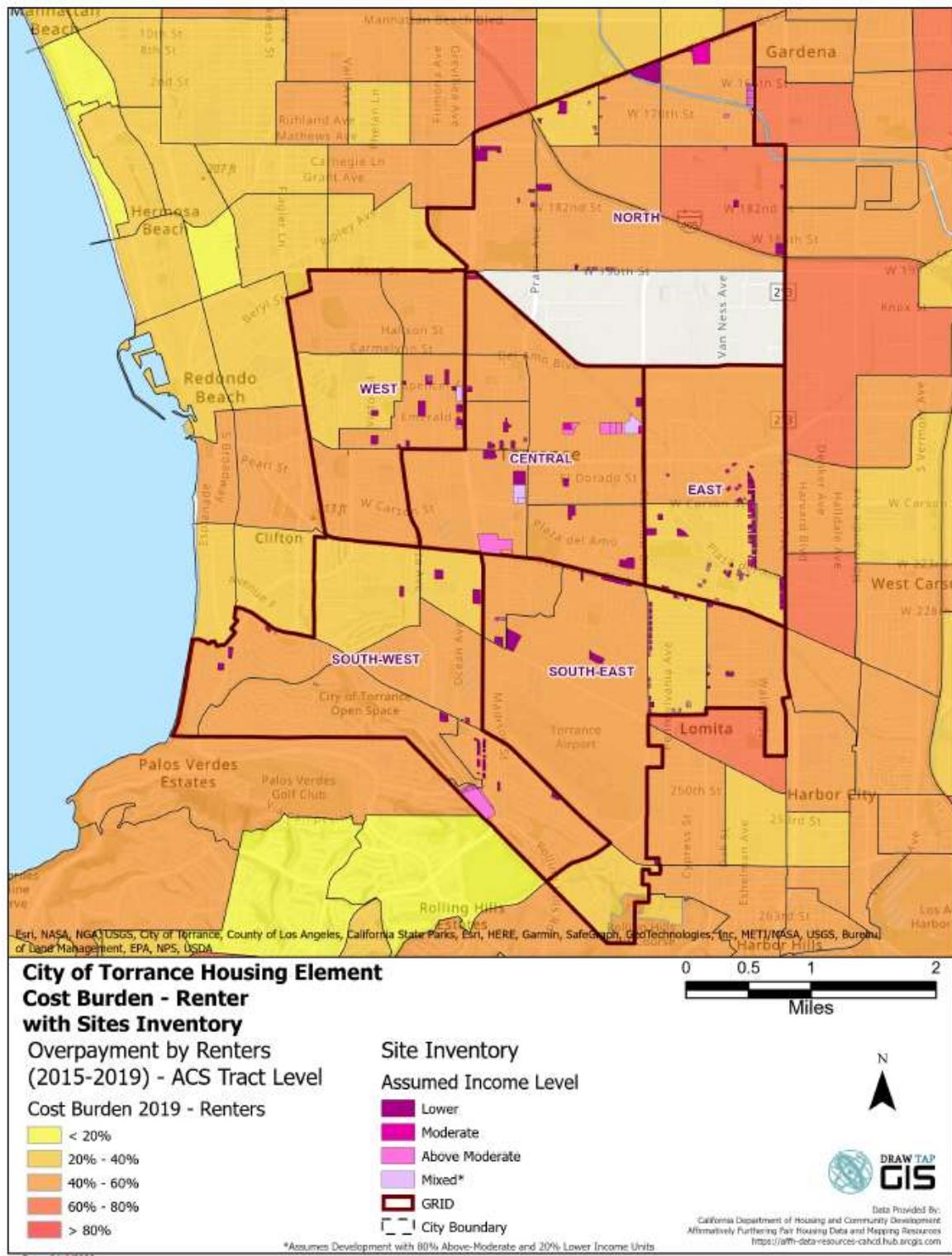
City/Town Boundaries

(A) Overpayment by Renters (ACS, 2010 - 2014) - Tract ACS

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

City of Torrance, County of Los Angeles, Bureau of Land Management,
Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, ©
OpenStreetMap contributors, and the GIS user community.

Figure D-27(D): Overpaying Renters (2015-2019)



Source: HCD Data Viewer, 2010-2014 and 2015-2019 ACS, 2022.

RHNA Unit Distribution by Cost Burden

Table D-20 shows the distribution of RHNA units by owner cost burden. Roughly half of the RHNA units are located in census tracts where 20 to 40 percent of homeowners are overpaying for housing. However, nearly 40% of RHNA units in the census tracts where 40 to 60 percent of homeowners are overpaying for housing. No RHNA units are located in census tracts where over 60 percent of owners are cost burdened because no such areas exist within the City.

Table D-20: RHNA Distribution by Owner Cost Burden

Owners Overpaying for Housing		RHNA Units by Income Level				
		Total	Lower	Moderate	Above Moderate	Mixed
< 20%	10%	10.8%	16.3%	5.5%	5.7%	12.4%
20 - 40%	47%	50.2%	31.6%	41.7%	75.7%	87.6%
40 - 60%	43%	38.9%	52.0%	52.8%	18.7%	0.0%
60 - 80%	0%	0.0%	0.0%	0.0%	0.0%	0.0%
> 80%	0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	31	6,473	2,710	1,582	1,479	702

Table D-21 shows the distribution of RHNA units by renter cost burden. As shown in the table, most RHNA units (80.8%) are located in census tracts where 40 to 60 percent of renters are overpaying for housing. Similarly, most census tracts in the City have between 40 and 60 percent of renters overpaying for housing. These areas include 74.8% of lower-income RHNA units, 71.7% of moderate-income RHNA units, 92.6% of above-moderate income RHNA units, and 100% of mixed-income RHNA units. No RHNA units are located in areas where over 80 percent of renters are cost burdened because no such areas exist within the City.

Table D-21: RHNA Distribution by Renter Cost Burden

Renters Overpaying for Housing		RHNA Units by Income Level				
		Total	Lower	Moderate	Above Moderate	Mixed
< 20%	0%	0.0%	0.0%	0.0%	0.0%	0.0%
20 - 40%	24%	16.8%	20.8%	27.3%	6.4%	0.0%
40 - 60%	73%	80.8%	74.8%	71.7%	92.6%	100.0%
60 - 80%	3%	2.3%	4.5%	1.0%	1.0%	0.0%
> 80%	0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	31	6,473	2,710	1,582	1,479	702

Overcrowding

Table D-22, below, shows that approximately 1.9% of owner-occupied households and 10.7% of renter-occupied households in Torrance are overcrowded. Overcrowding is more common countywide, where 5.7% of owner-occupied households and 16.7% of renter-occupied households are overcrowded. Approximately 0.5% of owner-occupied households and 3.0% of renter-occupied households in Torrance are severely overcrowded.

Figure D-28 shows the concentration of overcrowded households in Torrance by census tract. There are two tracts in the City with a concentration of overcrowded households above 20 percent, but in most of the city the concentration of overcrowded households is less than 5 percent. There are some areas of overcrowded households in the surrounding cities east of Torrance.

Table D-22: Overcrowded Households

Overcrowded	Torrance		Los Angeles County	
	Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied
Overcrowded (>1 person per room)	1.9%	10.7%	5.7%	16.7%
Severely Overcrowded (>1.5 persons per room)	0.5%	3.0%	1.5%	7.6%
Total Households	30,140	24,765	1,512,365	1,782,835

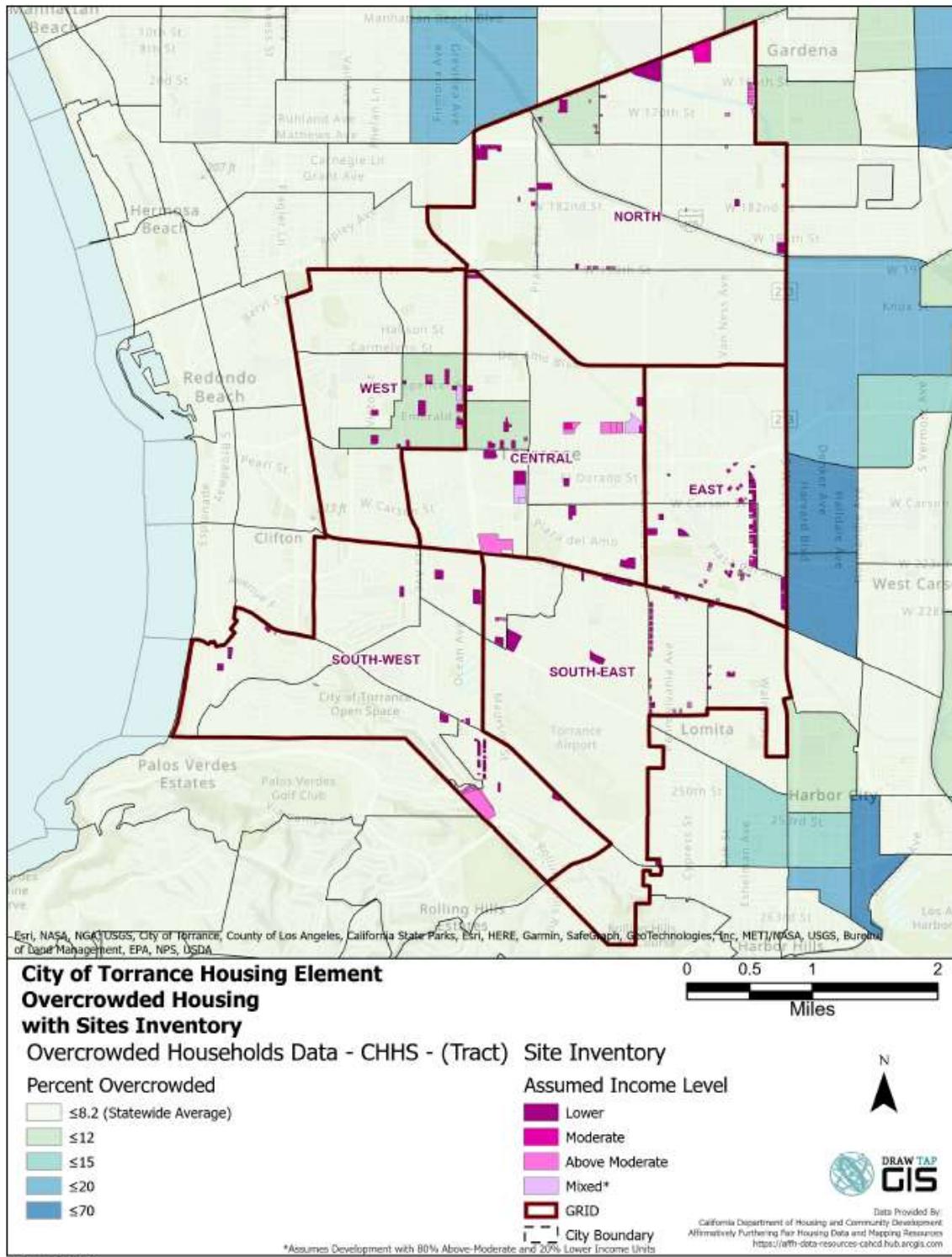
Sources: HUD CHAS Data (based on 2013-2017 ACS), 2021

RHNA Unit Distribution by Percent Overcrowded Households

Table D-23 shows the distribution of RHNA units by percent of overcrowded households. Most census tracts in the City (93%) do not have a higher-than-average percent of overcrowded households, so most RHNA units (90.1%) are located in census tracts with less than the state average of overcrowded households.

Table D-23: RHNA Distribution by Percent Overcrowded Households

Overcrowded Households Overcrowded HH in Tract	% of Total Tracts	RHNA Units by Income Level				
		Total	Lower	Moderate	Above Moderate	Mixed
≤ 8.2% (State Average)	93%	90.1%	86.4%	94.2%	93.7%	87.6%
≤ 12%	7%	9.9%	13.6%	5.8%	6.3%	12.4%
≤ 15%	0%	0.0%	0.0%	0.0%	0.0%	0.0%
≤ 20%	0%	0.0%	0.0%	0.0%	0.0%	0.0%
≤ 70%	0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total Units	31	6,473	2,710	1,582	1,479	702

Figure D-28: Concentration of Overcrowded Households

Source: HCD Data Viewer, 2013-2017 HUD CHAS Data, 2022.

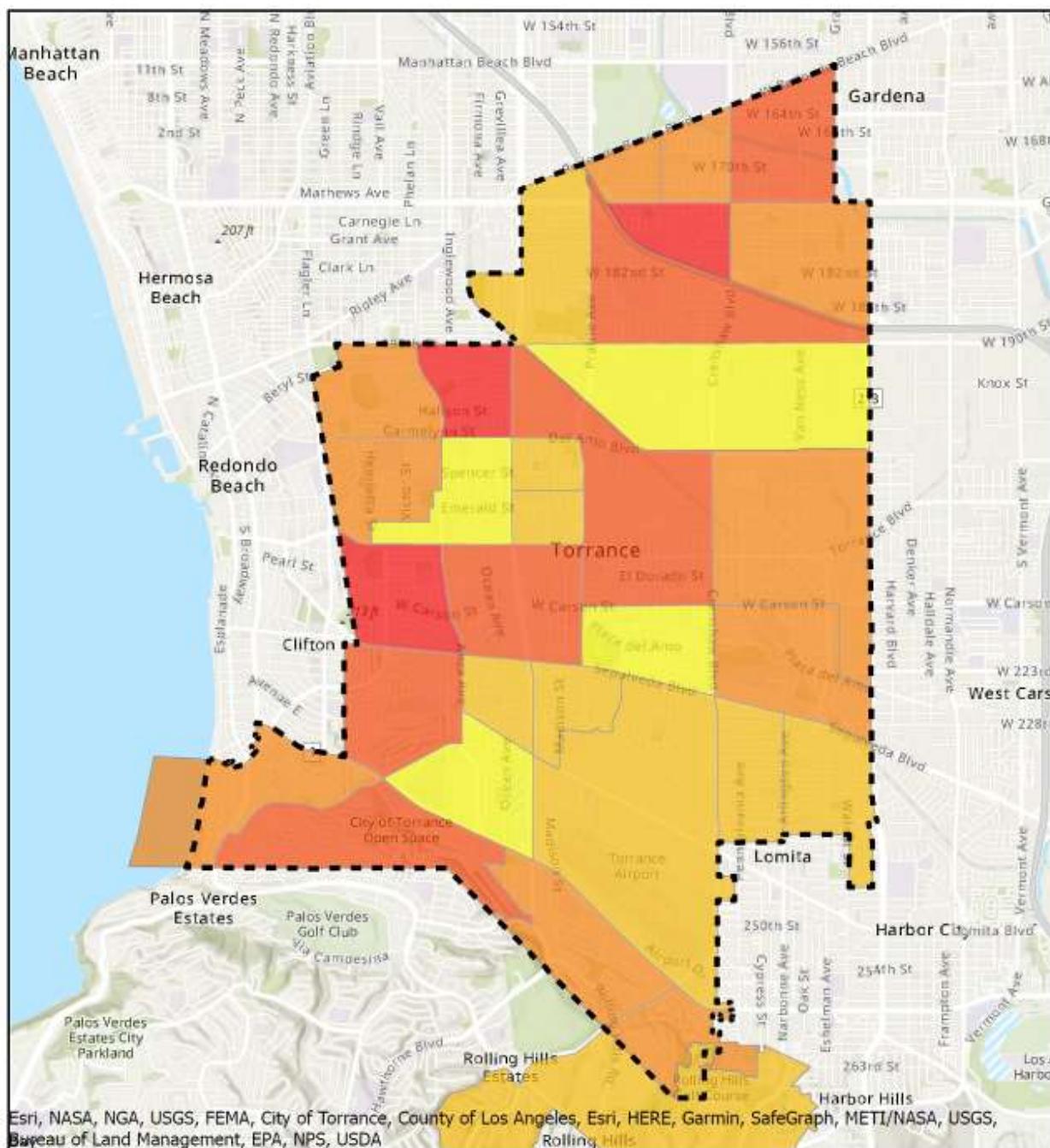
Substandard Housing Conditions

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. There are currently 125 owner-occupied households and 1,079 renter-occupied households in Torrance lacking complete plumbing or kitchen facilities according to HUD CHAS data, which represents 2.2% of all occupied households in the City. Countywide, 0.4% of households lack complete plumbing facilities and 1.6% of households lack complete kitchen facilities.

Housing age is frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Approximately 44.4% of housing is older than 60 years old in Torrance compared to 45.7% countywide. Figure E-29 shows the percentage of homes built before 1959 by housing tract. As shown in Figure E-29, tracts with a higher percentage of old housing are spread throughout the city, without clear clustering of higher and lower percentage tracts.

Overall, the housing stock in the city is generally in very good condition. Presumably, homeowners with higher incomes, such as those in Torrance, make it a priority and can afford to repair and renovate when needed. In the 5 years from 2017 through 2021, the City received a total of 1,762 residential property maintenance complaints, as shown in Table H-32. The annual numbers of complaints were consistently approximately 300; however, that number jumped to 565 in 2021. City staff are of the opinion that the increased number of residential property complaints in 2021 was related to the pandemic, as residents spent more time at home. Likewise, commercial property complaints also rose considerably in 2020 and 2021, again likely attributable to the pandemic and residents spending more time in the community. Abatement of property maintenance issues has been difficult due to material and labor shortages related to the COVID-19 pandemic.

Figure D-29: Housing Built Prior to 1959



Homes Stock 2010 Census Tracts

Percent Built 1959 or sooner (ACS 2019)

Less than 20%
20.1 - 40%
40.1 - 60%
60.1 - 80%
More than 80%

City Boundary

City of Torrance Pre-1960 Housing Stock (2019 5-Year ACS Estimates) by 2010 Census Tract



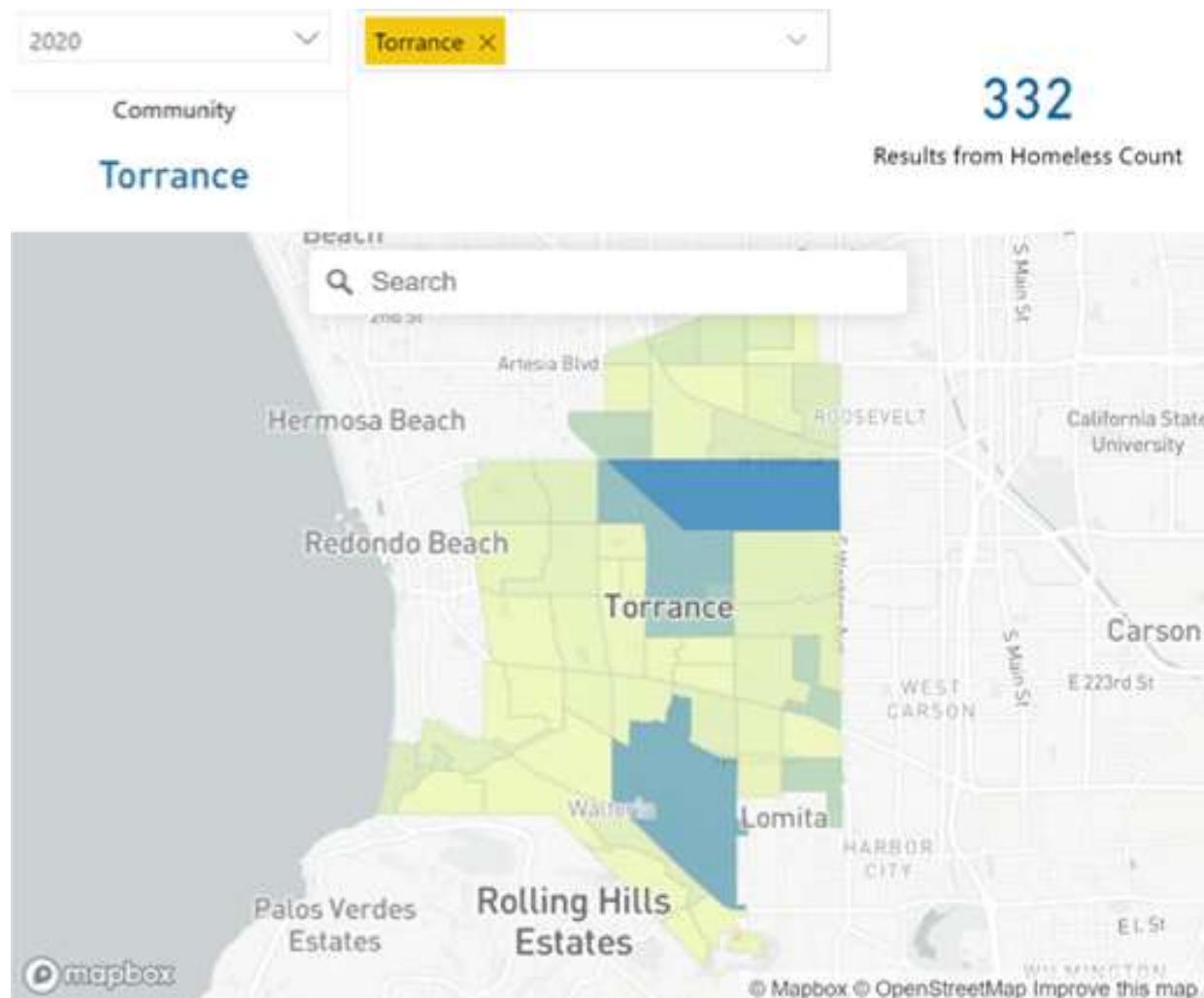
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Miles

Homelessness

In January 2020, Los Angeles Homeless Services Authority (LAHSA) conducted the annual Greater Los Angeles Homeless Count. The count showed that there were 332 people experiencing homelessness in Torrance. The 2021 count was cancelled due to the Covid-19 pandemic. The 2022 count was held in February 2022, however the results have not yet been released.

The 2020 count shows that people experiencing homelessness are more concentrated in certain parts of the City. Figure D-30 shows the census tracts with higher numbers of people experiencing homelessness, with the highest concentrations in the areas in the north and central part of the City. In particular, the tract with the highest number of people experiencing homelessness is also the tract with the lowest economic, environmental, and education scores, although these areas have better access to high-quality transit and jobs.

Figure D-30: People Experiencing Homelessness



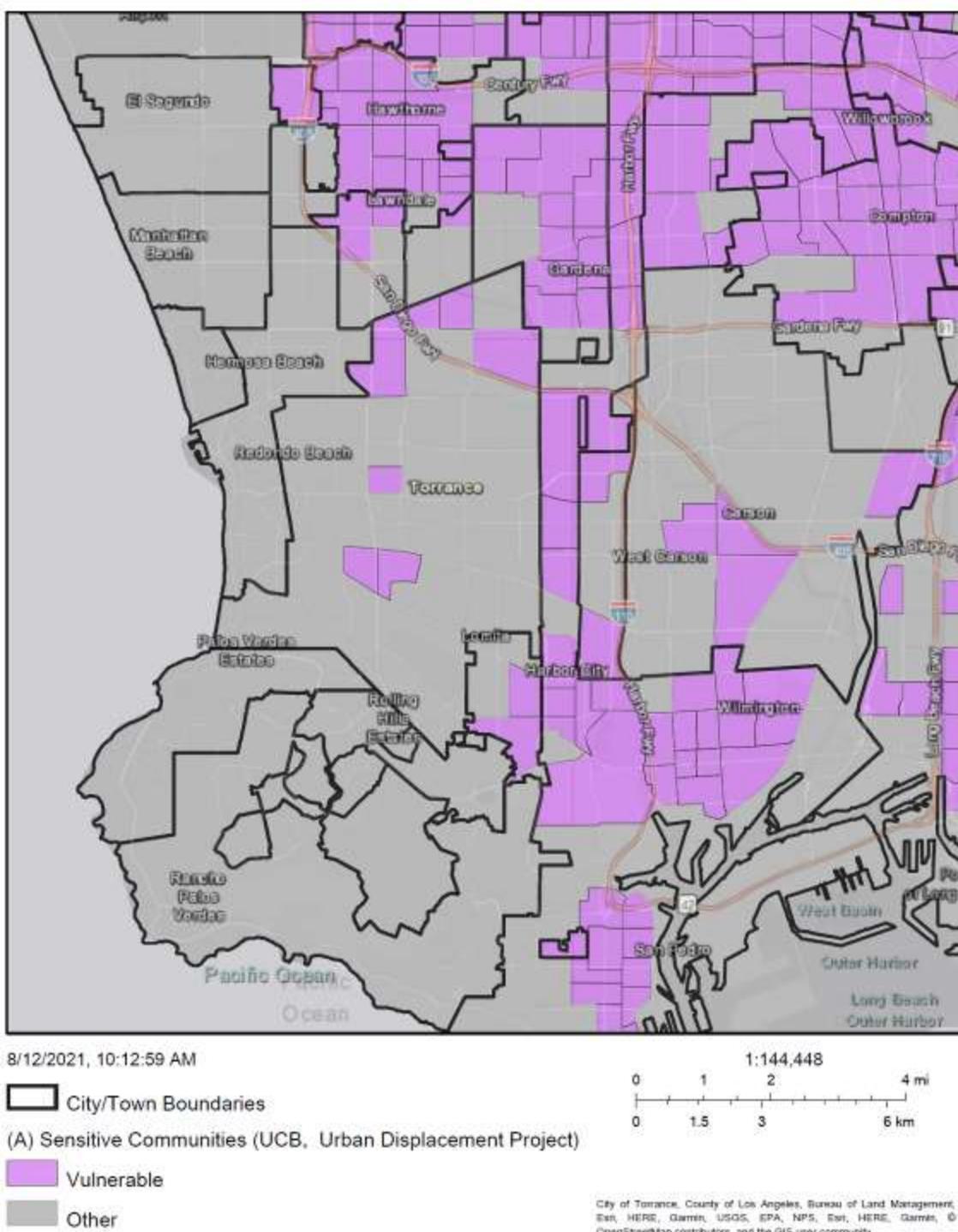
Displacement

HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low income residents is above 20%; and
- The tract meets two of the following criteria:
 - Share of renters is above 40%,
 - Share of people of color is above 50%,
 - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median,
 - They or areas in close proximity have been experiencing displacement pressures (percent change in rent above county median for rent increases), or
 - Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

There are several tracts in Torrance that have been identified as vulnerable communities at risk of displacement (Figure D-31). There are significantly more communities east and northeast of the city.

Figure D-31: Sensitive Communities at Risk of Displacement



Source: HCD Data Viewer, Urban Displacement Project, 2021.

D.2.6 Other Relevant Factors

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In the past, credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from having equal access to credit. In addition, informal practices such as real estate agents refusing to show homes in Torrance to non-white buyers or treating non-white buyers disrespectfully effectively preventing anyone besides white buyers from purchasing homes in many parts of the City. Figure D-32 shows the redlining maps for the Torrance. As shown in the maps, some central neighborhoods were “redlined,” making it difficult or impossible for people to gain access to residential financing in these areas.

The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

Figure D-32: Homeowners Loan Corporation Redlining Grade

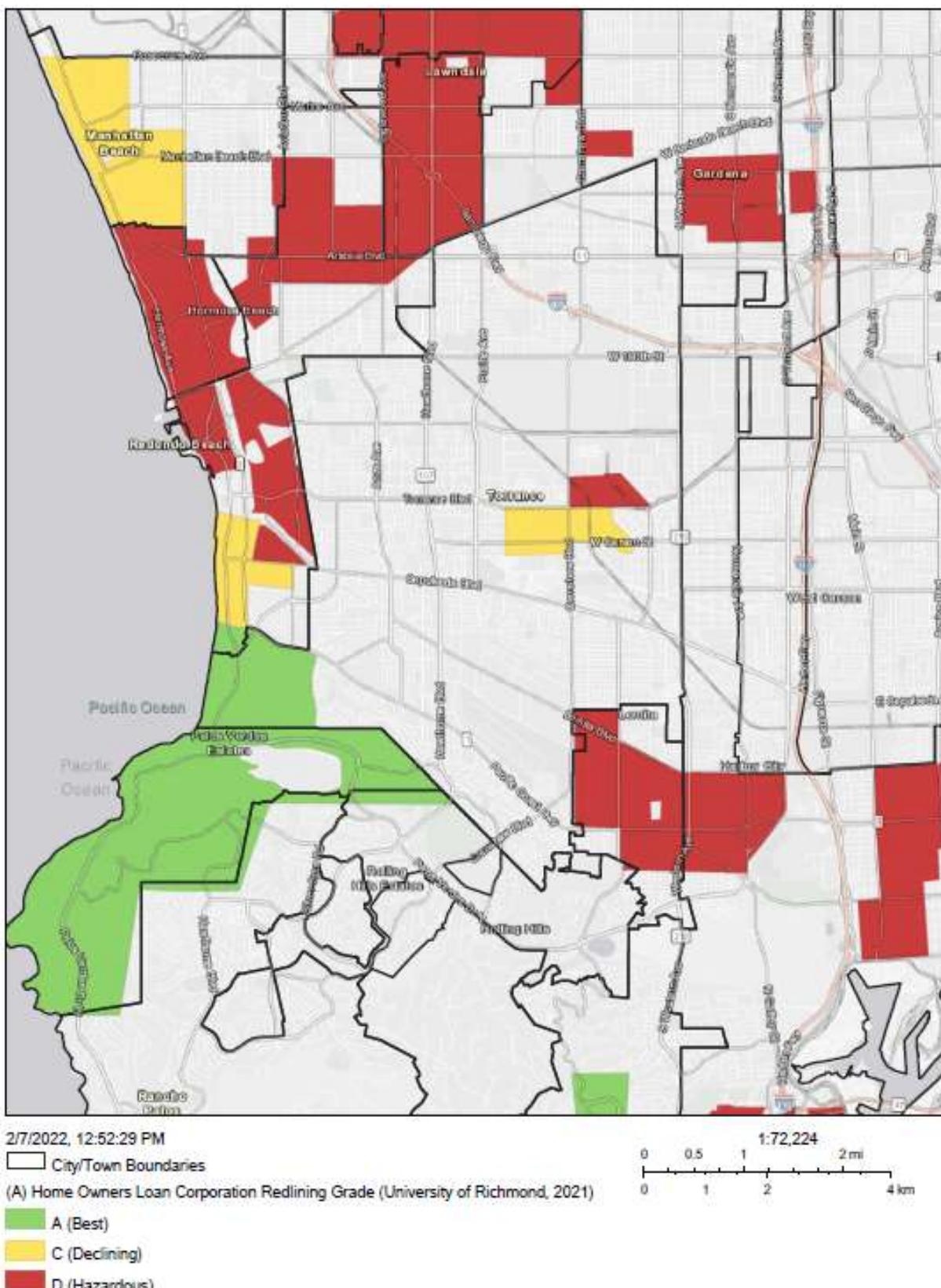


Table 24 summarizes home purchase and improvement loan applications in Torrance for 2020. Under the Home Mortgage Disclosure Act (HDMA), lending institutions are required to disclose information on the disposition of loan applications along with the income, gender, and race of loan applicants. In 2020, applications for home refinancing were the most common in Torrance. Of the 150,994 applications for refinancing, approximately 63 percent were approved, 20 percent were denied, and 16 percent were withdrawn or closed for incompleteness.

Though less common than loans for home purchase and refinance, there was a noticeable demand for home improvement financing in the City. A total of 34,147 households in Torrance applied for loans to make home improvements and approval rates for this loan type were 47 percent. About 46 percent of home improvement loan applications were denied.

Table D-24: 2020 Home Loan Applications

Table D-8: Summary of Fair Housing Issues Disposition of Home Loan Applications				
Type	Total Applications	Percent Approved*	Percent Denied	Percent Other**
Purchase - Conventional	89,745	79%	9%	12%
Purchase – Government Backed	19,742	83%	7%	10%
Home Improvement	34,147	47%	46%	8%
Refinancing	150,994	63%	20%	16%

*Percent approved includes loans approved by the lenders whether or not they are accepted by the applicants.

**Percent Other includes loan applications that were either withdrawn or closed for incomplete information.

Source: www.ffiec.gov, Home Mortgage Disclosure Act (HMDA) data for 2018

Environmental Justice Communities

Disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program. Known as California Climate Investments (CCI), these funds are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities at the same time they're reducing pollution that causes climate change.

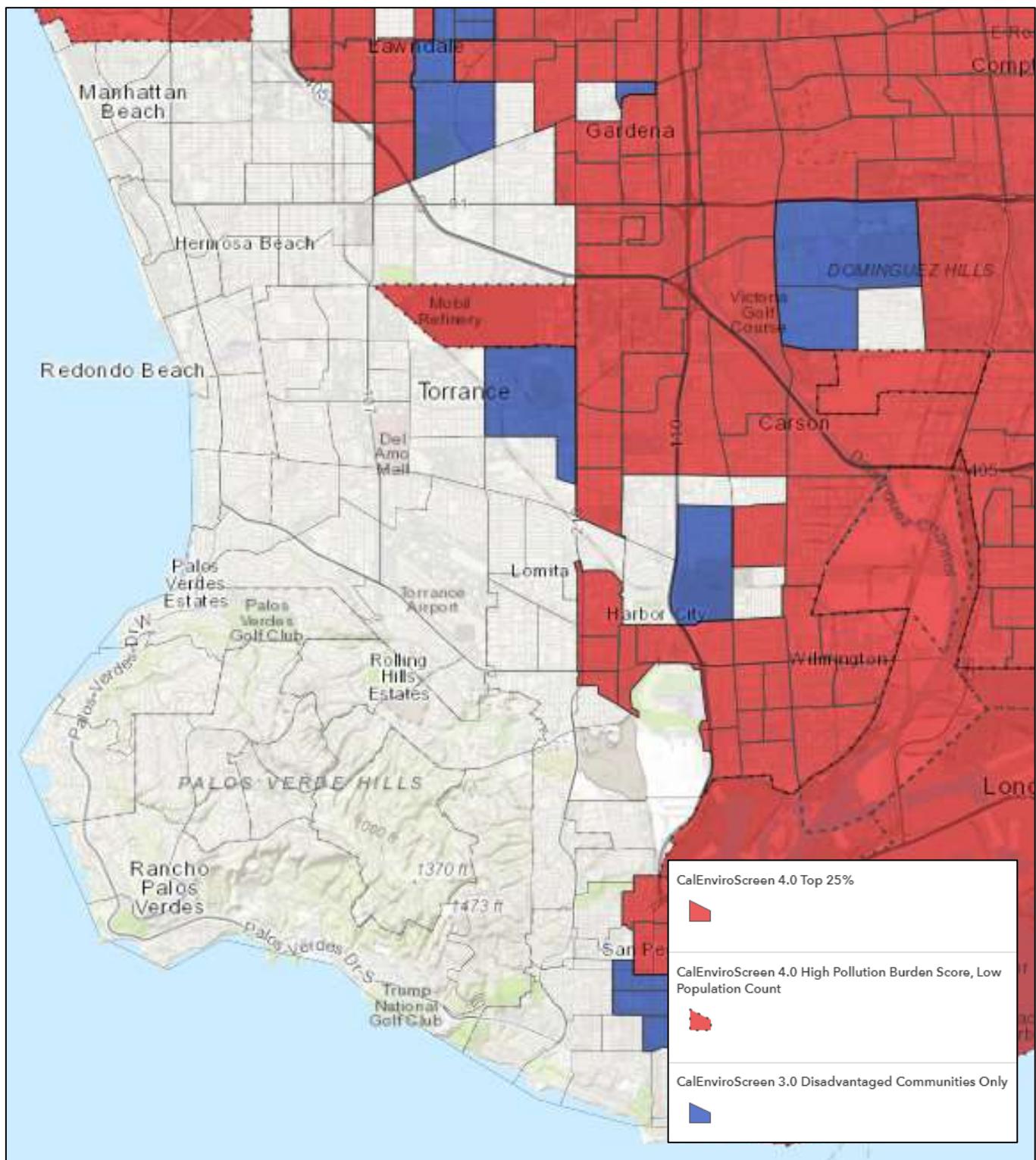
Any jurisdiction can choose to include policies focused on environmental justice (EJ) in their General Plan, but an EJ Element is required under state Law for any city or county that includes disadvantaged communities. For the purposes of environmental justice, a disadvantaged community is defined as, "An area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation."

Senate Bill 535 defines disadvantaged communities as the top 25% scoring areas from CalEnviroScreen. As shown below (Figure 33), a portion of Torrance falls within the category of a disadvantaged community due to this area being disproportionately affected by environmental pollution. In particular, impacts from ozone pollution affect the majority of the residents in these areas closest to a large refinery and major highways. The only part of Torrance that has a CalEnviroScreen score of 4.0 (the top 25% scoring area) is the area where the Torrance Refining Company, a 750-acre oil refinery, is located. As noted in Program 20, The City will prepare an Environmental Justice Element (EJE) by October 15, 2024. The EJE is intended to confront inequities by addressing the specific environmental

hazards faced by disadvantaged communities in meaningful policy. In accordance with SB 1000, the City will incorporate environmental justice policies into its General Plan to address the following environmental justice goals, policies, and objectives as required by State law:

- Reduction of pollution exposure and improving air quality
- Promoting access to public facilities
- Promoting access to healthy foods
- Promoting safe and sanitary homes
- Promoting physical activity
- Promoting civic engagement

Figure D-33: CalEPA Proposed SB535 Disadvantaged Communities (October 2021)



D.2.7 Sites Inventory

Sites have been identified throughout Torrance to meet the City's RHNA. These sites are shown in Figure D-34, which organizes sites by neighborhoods that include adjacent census tracts. Table D-25 summarizes the number and type of RHNA site in each neighborhood, along with the RHNA variables associated with that part of the City.

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50%) with a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. As discussed in Section D.2.3., according to HCD's 2020 R/ECAP mapping tool based on the 2009-2013 ACS, there are no R/ECAPs in Torrance.

Another indicator of characteristics that have been shown by research (HCD and the California Tax Credit Allocation Committee (TCAC) to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children—is the TCAC Opportunity Area Map, also discussed in Section D.2.3. There are no TCAC areas of high segregation and poverty in Torrance—the entire city is identified as an area whose characteristics have been shown to support positive economic, educational, and health outcomes for low-income households. As shown in Table D-17 (RHNA Distribution by TCAC Opportunity Area Category), 56.7 percent of all census tracts in Torrance are in the Highest Resource Area, 39.6 percent are in the High Resources Area, and 3.7 percent are in the Moderate Resources Area (refinery??).

The scores noted above are an indication that Torrance offers all residents a high quality of life. That being said, the AFFH analysis in Appendix D indicates that there are areas of the city where fair housing issues exist. —see Section D.2.8 (Summary of Fair Housing Issues).

The section below provides an overview of various neighborhoods within Torrance.

North Torrance

North Torrance includes census tracts in the northern part of the City, bounded by the City borders to the north and Del Amo Blvd to the south. This neighborhood currently includes 11,296 households, or about 22 percent of the City's households. Zoning in North Torrance is primarily single family residential in the north part of the neighborhood, with a large industrial area in the south, which includes the 750-acre Torrance Refining Company. Public use, commercial retail, and higher density multi-family residential zones are located along major streets in the neighborhood.

All census tracts in this neighborhood are designated High or Highest Resource, with the exception of Census Tract 6503 (Moderate Resource). Because the North Torrance neighborhood is the only neighborhood in Torrance with a census tract that has a Moderate Resource score, geographic targeting of AFFH actions should be directed here. North Torrance also has a higher predominance of environmental justice communities. While North Torrance has a relatively average home-owner cost burden compared to the rest of the city, it has a higher renter cost burden than other neighborhoods.

On average, the nonwhite population is slightly higher in this neighborhood than in the rest of the City. This neighborhood includes 1,193 RHNA units, which represents about 18% of the total units within the City. Of these, most are lower and moderate income. This is due to several factors, such as proximity

to key transit corridors; access to employment, commercial, and open space uses; and the state's size limits for lower-income units. Another factor is because of the identified trends in both Torrance and surrounding cities that are seeing transition of non-residential uses to residential ones. Note that two of the seven areas identified in the Housing Corridor Study are located within the North Torrance neighborhood, which will promote development of sites in the Sites Inventory. The City's program to adopt a Religious Institution Housing Overlay Zone (RIH-OZ) for affordable Housing will provide additional opportunities for lower-income households to locate throughout Torrance.

West Torrance

The West Torrance neighborhood includes census tracts at the western side of the City, north of Sepulveda Blvd and west of Hawthorne Boulevard and Anza Avenue. The bulk of West Torrance is single-family residential and public use, with the exception of the areas between Hawthorne Boulevard and Anza Avenue and along Torrance Boulevard, which include multi-family residential, commercial, industrial, and hospital/medical uses. This neighborhood includes 7,246 households in the City, or about 14% of the current households.

All census tracts in this neighborhood are designated Highest Resource and the low-moderate income population is generally lower than other neighborhoods. This neighborhood includes 438 RHNA units, which represents about 7% of the total units within the City. Of these, most are lower or mixed income. The location of lower- to moderate-income units in this neighborhood provides lower-income households proximity to the highest resources; proximity to key transit corridors; and access to employment, commercial, and open space uses.

Note that one of the seven areas identified in the Housing Corridor Study is located within the West Torrance neighborhood, which will promote development of sites in the Sites Inventory. Several of the sites are located along Hawthorne Boulevard, which already has a specific plan in place that promotes mixed-use development, a trend that has already been demonstrated in the Housing Element as being very popular and successful. As noted in the Housing Plan, the Hawthorne Boulevard Corridor Specific Plan (HBCSP) will be modified encourage more housing by reducing the required percentage of commercial use in a mixed-use development and modify development standards to address constraints that were identified by developers during the outreach phase of the Housing Element update. The Sites Inventory identifies many lower, moderate, and mixed income sites in the census tract with the highest level of overcrowding, so construction of addition units should help address that issue.

The City's program to encourage the production of ADUs, and especially ADUs that are affordable to lower-income households, will increase the opportunity for lower- and moderate income households to live in the West Torrance Neighborhood. Implementation of SB 9 also will expand opportunities for households of all incomes to live in this neighborhood. The City's program to adopt a Religious Institution Housing Overlay Zone (RIH-OZ) for affordable Housing will provide additional opportunities for lower-income households to locate throughout Torrance, especially in neighborhoods of higher-income households.

Central Torrance

Central Torrance includes the portion of the City located generally south of Del Amo Boulevard, east of Hawthorne Boulevard, west of Crenshaw Boulevard, and north of Sepulveda Boulevard. This

neighborhood includes 8,737 households or about 17% of the current households. Land use in Central Torrance includes a broad mix of single-family and multi-family residential, manufacturing, and planned districts—this neighborhood is also home to the key commercial district in Torrance, which includes Del Amo Fashion Center, which is the sixth largest shopping mall in the United States, with a gross leasable area of approximately 2.52 million square feet. The HBCSP applies to a large portion of this neighborhood, and there is significant developer interest in recycling existing non-residential uses into multi-family residential and mixed-use development.

All census tracts in this neighborhood are designated Highest Resource. Although Torrance generally does not have many areas with overcrowded housing, West Torrance does have one census tract (6506.02) that is slightly higher than the state-wide average. This neighborhood includes 2,503 RHNA units, which represents about 39% of the total units within the City. Of these, most are lower or above moderate income, although several sites are identified for moderate-income households. The size of many properties in the Central Torrance neighborhood provide an opportunity to facilitate development of lower- and moderate-income units in this neighborhood, as well as adding above-moderate income units. The location of lower- to moderate-income units in this neighborhood provides lower-income households proximity to the highest resources, as well as proximity to key transit corridors and the City's transit facility; and access to employment and commercial uses, and open space uses. This neighborhood includes the Madrona Marsh Preserve, a 43-acre seasonal wetland with vernal pools, which is one of the few natural areas remaining within an urban landscape in Southern California. Note that two of the seven areas identified in the Housing Corridor Study are located within the Central Torrance neighborhood, which will promote development of sites in the Sites Inventory.

East Torrance

East Torrance is located along the east boundary of the City, south of Del Amo Boulevard, east of Crenshaw Boulevard, and north of Sepulveda Boulevard. This neighborhood includes single-family and multi-family residential, commercial, manufacturing, and open space, recreational, and public uses. The Old Torrance neighborhood, which is also home to Torrance's historic downtown (Downtown Torrance), which was discussed in detail in Section 4 of the Housing Element. A former redevelopment area, Old Torrance has seen much development over the past several decades, including new residential developments ranging from market-rate townhomes to moderate-and lower-income multi-family developments, to an SRO—many of these developments received support by the City's former Redevelopment Agency and currently by the City. This is also an important employment area in Torrance.

There are 8,737 households in this neighborhood, which represents approximately 17% of the City's households. Both census tracts in this neighborhood are designated High Resource. This neighborhood includes 935 RHNA units, which represents about 14% of the total units within the City. Of these, most are moderate income. As described in Section 4, the City recently adopted a plan for Downtown Torrance that is promoting continued revitalization and facilitation of housing, with an emphasis on affordable housing. Note that East Torrance also includes two of the seven areas identified in the Housing Corridor Study, which will promote development of sites in the Sites Inventory.

Southwest Torrance

Southwest Torrance includes census tracts on the west side of the City south of Sepulveda Boulevard and west of Hawthorne Boulevard, as well as a census tract east of Hawthorne Boulevard south of Pacific Coast Highway. Land use in this neighborhood is primarily single-family residential, but includes multi-family residential uses adjacent to the coast, northwest of the intersection of Hawthorne and Pacific Coast Highway, and the Walteria district, which is on and near Hawthorne Boulevard south of Pacific Coast Highway. In addition, public and commercial uses are located along major streets like Hawthorne Boulevard and the Pacific Coast Highway. This neighborhood includes 12,265 households, which is 24% of the City's households.

All census tracts in this neighborhood are designated Highest Resource. This neighborhood includes 547 RHNA units, which represents about 9% of the total units within the City. Of these, most are lower or above moderate income. Hawthorne Boulevard provides the eastern border of a portion of the Southwest Torrance neighborhood and continues through Walteria to the southern city boundary. The HBCSP applies, which facilitates mixed-use and multi-family residential development in the subdistricts that are located in the Southwest neighborhood. Recycling of non-residential uses into mixed use developments are an ongoing trend in Walteria, as and several developers have expressed interest in continuing to add mixed use and multi-family residential development in the Southwest neighborhood. The City's program to encourage the production of ADUs, and especially ADUs that are affordable to lower-income households, will increase the opportunity for lower- and moderate income households to live in the Southwest Torrance Neighborhood. Implementation of SB 9 also will expand opportunities for households of all incomes to live in this neighborhood. The City's program to adopt a Religious Institution Housing Overlay Zone (RIH-OZ) for affordable Housing will provide additional opportunities for lower-income households to locate throughout Torrance, especially in neighborhoods of higher-income households.

Southeast Torrance

Southeast Torrance includes census tracts on the east side of the City south of Sepulveda Boulevard and west of Hawthorne Blvd. There are 6,997 households in this neighborhood, which represents about 14% of the City's households. Land use in this neighborhood includes single- and multi-family residential, along with a large portion of commercial and industrial use at and surrounding the Torrance Airport. Several housing corridors identified in the Housing Element are located in the Southeast neighborhood, a portion of the HBCSP is located here, as is one of the HCS areas.

The majority of census tracts in this neighborhood are designated High Resource, with a Highest Resource area located at the northwest corner of neighborhood. Southeast Torrance has a relatively higher rate of both renter and owner cost burden. This neighborhood includes 857 RHNA units, which represents about 13% of the total units within the City. Of these, most are lower income.

Figure D-34: Sites Inventory by Neighborhood

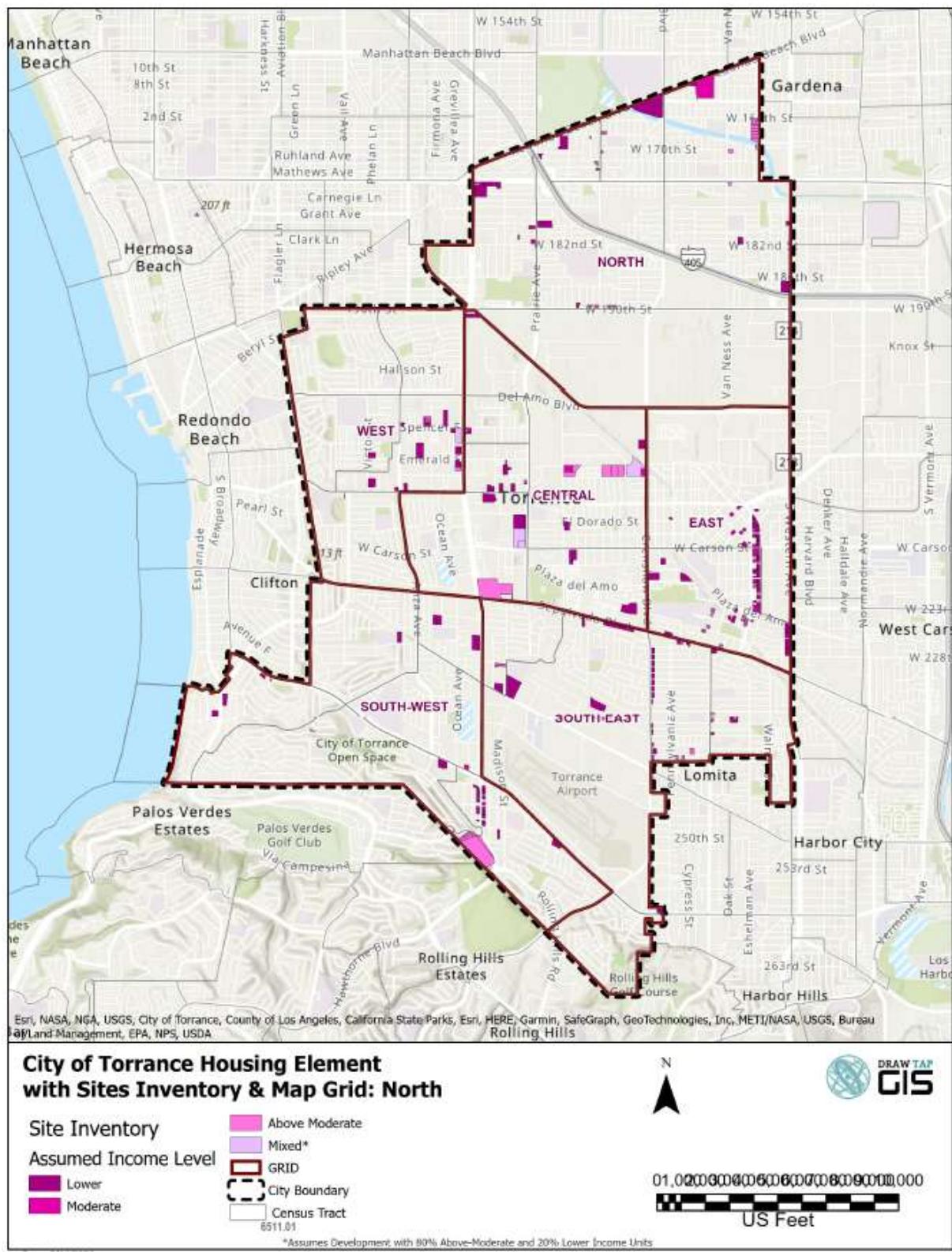


Table D-25: Residential Sites Inventory by Area and AFFH Variable

Tract	Households		Total Capacity (Units)		Income Distribution								TCAC Opp. Category	% Non-White (Block Group)	% LMI Pop. (Block Group)	R/ECAP?	% Over-crowded	Renter Cost Burden	Owner Cost Burden					
					Lower		Moderate		Above Moderate		Mixed													
	%	Total	%	Total	% of all units	% of Total	% of all units	% of Total	% of all units	% of Total	% of all units	% of Total												
Neighborhood: Central																								
Census Tract 6504.01	2.8%	1,468	10.7%	691	1.8%	116	1.3%	81	3.0%	193	4.7%	301	Highest Resource	60.56% - 64.46%	15% - 38%	No	4.37%	58.60%	31.90%					
Census Tract 6506.04	4.7%	2,419	2.5%	161	2.3%	149	0.1%	4	0.1%	8	0.0%	0	Highest Resource	71.73% - 76.93%	61% - 66%	No	8.69%	47.90%	29.40%					
Census Tract 6506.05	2.2%	1,120	0.5%	31	0.2%	15	0.2%	16	0.0%	0	0.0%	0	Highest Resource	69.85%	43%	No	6.74%	43.60%	33.60%					
Census Tract 6507.01	1.9%	972	21.9%	1420	5.3%	346	0.0%	0	11.7%	760	4.9%	314	Highest Resource	54.77%	27%	No	1.33%	52.00%	35.80%					
Census Tract 6508	5.4%	2,758	3.1%	200	3.1%	200	0.0%	0	0.0%	0	0.0%	0	Highest Resource	65.72% - 86.61%	20% - 39%	No	4.58%	49.50%	51.00%					
<i>Total</i>	<i>17.0%</i>	<i>8,737</i>	<i>38.7%</i>	<i>2,503</i>	<i>12.8%</i>	<i>826</i>	<i>1.6%</i>	<i>101</i>	<i>14.8%</i>	<i>961</i>	<i>9.5%</i>	<i>615</i>												
Neighborhood: East																								
Census Tract 6509.01	4.5%	2,342	4.6%	299	0.0%	2	4.6%	297	0.0%	0	0.0%	0	High Resource	54.07% - 58.18%	19% - 47%	No	2.60%	49.60%	43.80%					
Census Tract 6509.02	5.1%	2,629	9.8%	636	3.9%	251	5.0%	321	1.0%	64	0.0%	0	High Resource	63.71% - 77.95%	28% - 48%	No	6.03%	32.90%	47.30%					
<i>Total</i>	<i>9.7%</i>	<i>4,971</i>	<i>14.4%</i>	<i>935</i>	<i>3.9%</i>	<i>253</i>	<i>9.5%</i>	<i>618</i>	<i>1.0%</i>	<i>64</i>	<i>0.0%</i>													

Tract	Households		Total Capacity (Units)		Income Distribution								TCAC Opp. Category	% Non-White (Block Group)	% LMI Pop. (Block Group)	R/ECAP?	% Over-crowded	Renter Cost Burden	Owner Cost Burden					
					Lower		Moderate		Above Moderate		Mixed													
	%	Total	%	Total	% of all units	% of Total	% of all units	% of Total	% of all units	% of Total	% of all units	% of Total												
Neighborhood: North																								
Census Tract 6500.01	4.1%	2,094	9.0%	584	0.3%	21	7.0%	450	1.7%	113	0.0%	0	High Resource	78.10% - 80.31%	14% - 42%	No	1.86%	53.20%	27.00%					
Census Tract 6500.03	2.3%	1,163	0.9%	57	0.4%	25	0.2%	16	0.2%	16	0.0%	0	High Resource	73.43% - 77.90%	35% - 60%	No	8.22%	35.00%	47.30%					
Census Tract 6500.04	3.0%	1,529	1.6%	104	1.4%	90	0.0%	0	0.2%	14	0.0%	0	Highest Resource	75.84% - 79.88%	47% - 48%	No	5.12%	58.40%	41.30%					
Census Tract 6501.01	4.1%	2,095	2.3%	152	1.9%	121	0.2%	16	0.2%	15	0.0%	0	High Resource	77.57% - 86.90%	21% - 49%	No	3.05%	62.40%	18.50%					
Census Tract 6502	3.7%	1,895	0.8%	55	0.6%	39	0.0%	0	0.2%	16	0.0%	0	High Resource	58.76% - 69.21%	19% - 33%	No	3.72%	56.90%	39.30%					
Census Tract 6503	4.9%	2,520	3.7%	241	3.3%	214	0.4%	23	0.1%	4	0.0%	0	Moderate Resource	65.85% - 67.85%	31% - 48%	No	2.95%	55.00%	41.40%					
	21.9%	11,296	18.4%	1,193	7.9%	510	7.8%	505	2.7%	178	0.0%	0												
Neighborhood: Southeast																								
Census Tract 6510.01	3.5%	1,799	0.6%	37	0.2%	12	0.2%	14	0.2%	11	0.0%	0	High Resource	59.80% - 67.82%	21% - 51%	No	2.22%	57.80%	37.20%					
Census Tract 6510.02	3.3%	1,703	3.9%	252	2.2%	142	1.5%	95	0.2%	15	0.0%	0	High Resource	61.53% - 65.53%	22% - 35%	No	2.34%	39.10%	28.20%					
Census Tract 6511.01	3.6%	1,850	7.6%	491	6.8%	442	0.7%	43	0.1%	6	0.0%	0	High Resource	59.25% - 65.52%	19% - 35%	No	3.26%	46.80%	48.20%					
Census Tract 6511.02	3.2%	1,645	1.2%	77	0.9%	60	0.0%	0	0.3%	17	0.0%	0	Highest Resource	65.53%	43%	No	4.04%	47.20%	52.10%					
	13.6%	6,997	13.2%	857	10.1%	656	2.3%	152	0.8%	49	0.0%	0												

Tract	Households		Total Capacity (Units)		Income Distribution								TCAC Opp. Category	% Non-White (Block Group)	% LMI Pop. (Block Group)	R/ECAP?	% Over-crowded	Renter Cost Burden	Owner Cost Burden					
					Lower		Moderate		Above Moderate		Mixed													
	%	Total	%	Total	% of all units	% of Total	% of all units	% of Total	% of all units	% of Total	% of all units													
Neighborhood: Southwest																								
Census Tract 6512.01	3.2%	1,634	0.1%	8	0.1%	8	0.0%	0	0.0%	0	0.0%	0	Highest Resource	36.99%	15%	No	0.91%	29.40%	37.60%					
Census Tract 6512.21	2.7%	1,395	2.0%	128	2.0%	128	0.0%	0	0.0%	0	0.0%	0	Highest Resource	65.41%	44%	No	2.30%	38.10%	16.60%					
Census Tract 6512.22	4.5%	2,329	0.3%	17	0.0%	0	0.3%	17	0.0%	0	0.0%	0	Highest Resource	59.67%	41%	No	4.98%	44.90%	45.30%					
Census Tract 6513.02	4.4%	2,287	0.2%	15	0.2%	15	0.0%	0	0.0%	0	0.0%	0	Highest Resource	39.61% - 52.60%	7% - 39%	No	2.89%	49.30%	45.40%					
Census Tract 6513.04	4.5%	2,327	0.4%	25	0.4%	23	0.0%	0	0.0%	2	0.0%	0	Highest Resource	25.15% - 26.94%	16% - 36%	No	0.59%	48.40%	57.50%					
Census Tract 6514.02	4.5%	2,293	5.5%	354	1.4%	88	1.8%	118	2.3%	148	0.0%	0	Highest Resource	51.44% - 65.72%	7% - 45%	No	6.09%	51.30%	41.90%					
	23.8%	12,265	8.5%	547	4.0%	262	2.1%	135	2.3%	150	0.0%	0												
Neighborhood: West																								
Census Tract 6505.02	2.9%	1,478	0.1%	5	0.0%	0	0.0%	0	0.1%	5	0.0%	0	Highest Resource	48.61%	22%	No	2.33%	41.30%	40.70%					
Census Tract 6506.02	5.3%	2,726	6.5%	421	3.0%	194	1.1%	71	1.1%	69	1.3%	87	Highest Resource	65.97% - 81.93%	27% - 51%	No	8.49%	42.40%	12.40%					
Census Tract 6506.03	2.9%	1,492	0.1%	9	0.1%	9	0.0%	0	0.0%	0	0.0%	0	Highest Resource	60.23%	47%	No	1.66%	37.60%	34.90%					
Census Tract 6507.02	3.0%	1,550	0.0%	3	0.0%	0	0.0%	0	0.0%	3	0.0%	0	Highest Resource	46.15%	25%	No	0.56%	54.50%	31.70%					
	14.1%	7,246	6.8%	438	3.1%	203	1.1%	71	1.2%	77	1.3%	87												

D.2.8 Summary of Fair Housing Issues

Table D-25, below, summarizes the fair housing issues identified in this Fair Housing Assessment. As discussed in the previous sections of this analysis, the following conclusions were determined regarding potential fair housing concerns and indicators of certain disadvantaged populations:

- The highest resource areas (environment, education, income, etc.) are in the western portion of the City, while the high resource areas are located on the eastern side of the City, which is also identified as having a higher percentage of LMI population. The only moderate resource area in the City is located on the north border in the central part of the City. The City's distribution of resource areas are consistent with cities in areas surrounded by the ocean, hillside, and urban communities.
- Overall, Asian, Pacific Islander, and Hispanic households experience a disproportionately higher percent of housing problems when compared to all other races/ethnicities within the City and may be underserved and in need of additional affordable housing opportunities.
- The southwestern portion of the City that experiences high resources and greater incomes, contains a sizable gap of predominately White residents. Areas outside of the southwestern portion of the City contains a sizable gap of predominately minority concentrations.
- Seniors experience a disproportionate percentage of housing problems compared to other family types within the City.

Overall, this analysis shows that the primary barrier to fair housing in Torrance is high housing cost, which has the effect of limiting access by lower-income households to the high opportunities and resources available in the City. There is no evidence to suggest that discrimination against racial groups or persons with disabilities is a major issue. The Housing Plan includes several programs to encourage and facilitate affordable housing development, as well as the provision of accessory dwelling units, which can expand affordable housing opportunities for lower-income persons such as seniors, female-headed households, and others working in service occupations.

Table D-25: Summary of Fair Housing Issues

Fair Housing Issue	Summary
Enforcement and Outreach	<ul style="list-style-type: none"> • HRC conducts outreach and education throughout Los Angeles County, including Torrance. • Between January 2013 and March 2021, Torrance received 48 fair housing inquiries. • LACDA has committed to complying with the Fair Housing Act and related regulations. • There are 227 units with renters receiving HCVs in the city, primarily in the northwest and southeast areas of the city. • There are no public housing buildings in Torrance.
Integration and Segregation	
Race/Ethnicity	<ul style="list-style-type: none"> • There has been a small decrease in overall racial/ethnic minority populations, from 50% in 2010 to 47% in 2019, but an increase in concentration of racial/ethnic minorities within census tracts.

	<ul style="list-style-type: none"> Based on HUD dissimilarity indices, segregation between non-White and White communities is high and has worsened since 1990. Racial/ethnic minorities are more concentrated in the eastern and central areas of the city.
Disability	<ul style="list-style-type: none"> 9.0% of Torrance residents experience a disability, a slight increase from 6.9% in 2012. Populations of persons with disabilities are spread evenly throughout the city.
Familial Status	<ul style="list-style-type: none"> 31.0% of households have one or more children under age 18; 4.6% of households are single-parent households; 3.9% of households are single-parent female-headed households. Over 60% of children live in married-couple households in the city, with few locations that have a higher concentration of children in female-headed households.
Income	<ul style="list-style-type: none"> 36.1 of households earn less than 80% of the area median family income. Median household income is \$116,447, higher than the countywide average. There are two tracts in the city with at LMI population greater than 51%, one in the center of Torrance and one on the north boundary.
Racially or Ethnically Concentrated Areas of Poverty	
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)	<ul style="list-style-type: none"> There are no R/ECAPs located in Torrance. The R/ECAPs closest to the city are located to the southeast and northeast.
Racially or Ethnically Concentrated Areas of Affluence (RCAAs)	<ul style="list-style-type: none"> Torrance is predominantly White in the area adjacent to the coast, becoming less so farther to the east and north. All areas of the city have at least 20% racial/ethnic minority concentrations. Nearly all block groups in the city have median incomes exceeding the 2020 State median, and there is no clear concentration of higher or lower median incomes.
Access to Opportunities	<ul style="list-style-type: none"> In the Urban County, Hispanic residents are most likely to be impacted by poverty, low labor market participation, and poor environmental quality. All tracts in Torrance are considered Moderate to Highest Resource areas.
Economic	<ul style="list-style-type: none"> All tracts in Torrance have economic scores above 0.50, with the exception of the one tract located along the eastern boundary of the city that has an economic score of less than 0.25.
Education	<ul style="list-style-type: none"> All parts of Torrance have education scores above 0.50, with the exception of the one tract located along the eastern boundary of the city that has a score of less than 0.25.
Environmental	<ul style="list-style-type: none"> About half the tracts in the city have the highest environmental scores between 0.75 and 1.0. Many of the central and northeast tracts in the city have the lowest environmental scores (0.25).
Transportation	<ul style="list-style-type: none"> Block groups in the central areas of the city scored the best in jobs proximity, while areas around the city's boundaries scored increasingly poorer. There are limited HQTAs in Torrance, with HQTAs in the north-central part of the city, as well as along its eastern boundary.
Disproportionate Housing Needs	<ul style="list-style-type: none"> 29.8% of owner households and 53.9% of renter households have a housing problem.

	<ul style="list-style-type: none"> Non-White owner-occupied households have higher rates of housing problems than White owner-occupied households. In renter-occupied households, more than half of Asian, Pacific Islander, and Hispanic households experienced a housing problem Renter-occupied households experience housing problems at a higher rate than owner-occupied households, with the exception of Other and Black households in the city.
Cost Burden	<ul style="list-style-type: none"> Black households have the highest rate of cost burden for owner-occupied units in the city but make up a small overall proportion of households. Over 25% of Hispanic owner-occupied households, and over 48% of Hispanic renter-occupied households have a cost burden. Cost burdened households most concentrated in the areas along the north and south boundaries of the city.
Overcrowding	<ul style="list-style-type: none"> 1.9% of owner households and 10.7% of renter households are overcrowded. 0.5% of owner-occupied households and 3.0% of renter-occupied households are severely overcrowded. There are two tracts in Torrance with a concentration of overcrowded households above 20%, but in most of the city the concentration of overcrowded households is less than 5%.
Substandard Housing Conditions	<ul style="list-style-type: none"> There are 125 owner-occupied households and 1,079 renter-occupied households lacking complete plumbing or kitchen facilities in Torrance, which represents 2.2% of city households. Tracts with a higher percentage of old housing are spread throughout the city, without clear clusters of higher and lower percentage tracts.
Displacement	<ul style="list-style-type: none"> There are several vulnerable communities at risk of displacement in Torrance, but significantly more to the east and northeast of the city.

D.3 PRIORITIZATION OF CONTRIBUTING FACTORS

The following are contributing factors that affect fair housing choice in Torrance.

D.3.1 Insufficient and Inaccessible Outreach and Enforcement

According to the Fair Housing Survey included in the 2018 Regional AI, 39% of respondents were not aware of their right to request accommodations per Fair Housing, Section 504, and ADA laws. The City currently has limited information regarding fair housing laws, discriminatory practices, and services available to the public. Very few renters in Torrance receive housing choice vouchers despite the concentration of overpaying renters in some Torrance tracts.

Contributing Factors

- Lack of a variety of input media (e.g., meetings, surveys, interviews)
- Lack of fair housing information on the City's website
- Insufficient local public fair housing enforcement and testing

D.3.2 Lack of Income Diversity

There are fewer low-moderate income households and a higher median household income in Torrance compared to other cities countywide, and the lowest and highest income households are not

concentrated in any particular area of the city. While higher household incomes are generally considered a good thing, the overall lack of lower-income households in Torrance suggests that many people may be priced out of housing in the city entirely.

Contributing Factors

- Lack of private investment in affordable housing
- Development costs
- Land use restrictions

D.3.3 Displacement Risk to Low Income Households Due to Economic Pressures

There are several locations that have been identified as vulnerable communities at risk of displacement according to the Urban Displacement Project, primarily in the east/northeast areas of the city. A higher percentage of Black and Asian owner-occupied households, and Pacific Islander and Hispanic renter-occupied households have a cost burden compared to White households. While the number of overpaying owners and renters has been decreasing over time, there are still a large number of tracts where owners and renters overpay for housing.

Contributing Factors

- Unaffordable rents
- Lack of available affordable housing
- Lack of private investment in new housing construction

D.3.4 Concentration of Environmental Challenges

The TCAC identified a concentration of census tracts in the central/northeast part of the city with poor environmental health scores. Residents in these areas may be subject to environmental hazards that other communities do not face. These include hazards from air and water pollution, traffic, and nearby cleanup sites and waste facilities.

Contributing Factors

- Pollution burden
- Cleanup site locations
- Waste facilities locations

D.3.5 Lack of Affordable Housing

Home values are very high throughout the City, with the city's median home price approximately \$1.05 million in 2021. Home values have risen nearly 20% in the 2020-2021 time period. These prices make homeownership untenable for low- and moderate-income households in the City. Rental availability is limited in the City and is similarly expensive, with a two-bedroom apartment renting for nearly \$2,400 in 2021 and larger apartments and homes renting for even more, rents that are outside the affordability range for low- and moderate-income households in the City. Overall, most housing is not affordable to

even moderate-income families in Torrance, and low- and extremely-low income households face even more challenges finding affordable housing in the City.

Contributing Factors

- High land costs
- Limited housing stock

D.3.6 Historic Patterns That Affect Exclusion

When the city of Torrance incorporated in 1921, it covered approximately 3.8 square miles and had a population of 1,800. It was established by Jared Sidney Torrance (1852- 1921), a Pasadena real estate developer and vice president of Union Oil Company, who envisioned a planned residential and industrial community. Only a few years after the City's incorporation in 1921, petroleum was discovered in Torrance—the discovery transformed the City from a small town to a major industrial area. Industry in Torrance continued to shape its development as a major employment center in the region.

According to census data, the population (and number of housing units) in Torrance skyrocketed between 1950 and 1960, growing from 22,241 to 100,991 residents in one decade. By 1970, the population had risen to 134,968. The majority of this development occurred in single-family neighborhoods that were developed by both national and local developers. California's aerospace industry began in Torrance and surrounding communities, and has played an important role in City history as well. The new neighborhoods catered to people working in cutting-edge technologies like the aerospace industry, as a mecca for young, middle class families who were almost exclusively white. Another draw for young families in the high growth era of the 1950's to 1970's was the public school district in Torrance. the Torrance Unified School District (TUSD), which serves the entire city, has long been—and continues to be—a desirable location for families due to its public school district. The TUSD was established in 1947 and unified in 1948. It is a highly rated district with a graduation rate of 95% (tusd.org). According to Niche (niche.com), which ranks nearly 100,000 schools and districts, TUSD ranks #45 of 438 school districts in California.

The population in Torrance leveled off significantly after the development and population boom of the 1950's to 1970's, increasing by only 9,462 residents in the past 50 years. This was largely due to Torrance being built out.

In addition to the city's development history, over the past century, discriminatory lending practices and informal exclusion of non-white buyers prevented many non-white households from purchasing homes in Torrance. Even after these practices were declared unconstitutional, the established patterns of racial and economic segregation remained in place. Existing residents lobbied to retain single-family zoning and ensure high home values in desirable neighborhoods in Torrance. Though the intent of these actions may not have been to directly discriminate, the effect was to exclude certain groups of people, such as lower-income and/or non-white families, from moving into the City. That pattern has been changing over the past several decades—today, Torrance is a majority minority city.

Contributing Factors

- Historic redlining and informal discrimination against non-white buyers
- Land use and zoning rules that promoted housing for higher-income households
- Lack of developable land

D.4 PRIORITIES, GOALS, AND ACTIONS

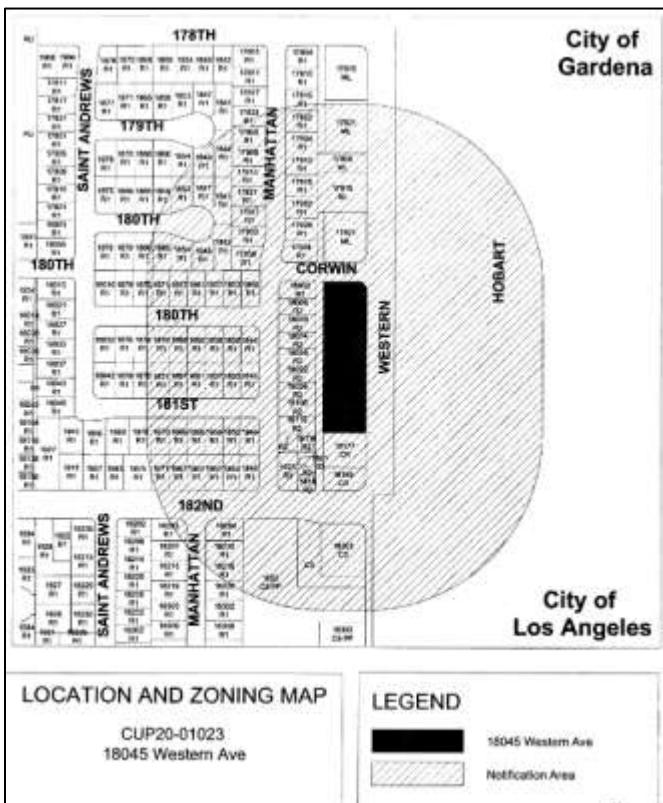
To adequately meet the housing needs of all segments of the community, the Housing Plan must promote housing opportunities for all people. Table H-45 in Section 5 (Housing Plan) presents a summary of the issues, contributing factors, and the City's actions in addressing the issues.

APPENDIX E: SAMPLING OF ENTITLED AND CONSTRUCTED PROJECTS THAT DEMONSTRATE CONSISTENCY WITH DEVELOPMENT TRENDS

Project Identification:	A (Entitled Project)
Year:	2021
Project Description:	Mixed use development (horizontal) with 32 units & 6,440 ft ² of commercial, including restaurant, office, retail. (Previous request for 46-unit project at 38.3 du/ac, developed to R-4 standards, was denied in 2019. This project is a redesign) <ul style="list-style-type: none"> • CUP (CUP20-01023)
Address:	18045 Western Ave. (formerly 1802—18141 Western Ave.)
APN:	4096-018-034, 4096-018-033, 4096-018-032
Size:	52,388 ft ² parcel (1.2 acre) (6-lot consolidation)
Prior Use:	Combination of undeveloped, former market/parking, and former structure that was razed in 2019
General Plan:	Existing: C-GEN (General Commercial) <ul style="list-style-type: none"> • Allowable Density: N/A • Expected Density: N/A Proposed: No change
Zoning:	Existing: C-2 (General Commercial) (Site was approved a ZON from C-R to C-2 in 2019) <ul style="list-style-type: none"> • Allowable density: 43 du/ac (C-2 zone allows R-4 residential uses with a CUP) Proposed: No change
Project Density:	26.7 du/ac <ul style="list-style-type: none"> • Percent of maximum allowable Zoning density: 62.1% • Percent of expected GP density: N/A
Units:	32 units on 2 nd & 3 rd floors; parking in garage on ground floor <ul style="list-style-type: none"> • 993 – 1,295 ft² • 2-bedroom (all)
Parking:	106 required; 100 provided—7 residential guest spaces are also commercial spaces
Height:	35 – 45 feet
FAR:	1.07:1 (max allowable is 1.0:1, which will be achieved via redesign)
Income Category:	Market rate (above moderate)
Development Trends¹:	Nonresidential use converted mixed use development
Criteria²:	1, 2, 3.c., 3.d., 3.f.

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Identification: B (Entitled Project)**Project Description:** 24-unit townhouse condominium development

- CUP (CUP20-01016)
- Precise Plan of Development (PRE20-01014)
- Tentative Tract Map for parcel merger & condominiums (DIV20-01007)

Year: Anastasi Development (2021)**Address:** 18080 – 18090 Prairie Avenue**APN:** 4088-006-CONDO01 (current)**Size:** 42,294 ft² (0.97 acre) (2 parcels consolidated)**Prior Use(s):** Residence, store, & mixed-use building (1959) and a church (1974)**General Plan:** Existing: R-MD (Medium Density Residential)

- Allowable Density: 18.1 – 31 du/ac
- Expected Density: 23.25 du/ac

Proposed: No change**Zoning:** Existing: R3-PP (Restricted Residential – Precise Plan Overlay)**Proposed:** No change**Project Density:** 24.7 du/ac

- Percent of maximum allowable GP density: 79.7%
- Percent of expected GP density: 106.2%

Units: 24 townhouse units in 4 buildings (two 2-unit buildings, two 10-unit buildings)1,086 ft² each

2-bedroom (all)

Parking: 53 required; 55 proposed**Height:** 22 feet**FAR:** 0.62:1 (proposed); project conditioned to reduce to maximum allowable 0.6:1**Income Category:** Market rate**Development Trends¹:** Nonresidential use converted to residential use**Criteria²:** 1, 3.c., 3.d.¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.

Project Identification: C (Entitled)**Project Description:** 3-story Mixed Use Development (9 dwelling units + office area)

- CUP (CUP20-01008)
- Development Permit (DVP20-00001)
- Division of Lot to consolidate 2 parcels (DIV20-01003)

Date: 2020**Address:** 24449 Hawthorne Blvd. & 24453 Hawthorne Blvd. (HBCSP-WT)**APN:** 7534-021-038, 7534-021-039**Size:** 15,132 ft² combined (0.35 acre) (2 lots, to be consolidated)**Prior Use(s):** Commercial building (1963), with storage building and shed (1999)**General Plan:** Existing: C-GEN (General Commercial)

- Allowable Density: N/A
- Expected Density: N/A

Proposed: No change

Zoning (Existing): HBCSP, Walteria Sub-District (H-WT)

- Allowable Density: 27 du/ac max.

Proposed: No change

Project Density: 25.7 du/ac

- Percent of maximum zoning allowable: 95.2%
- Percent of expected GP: N/A

Units: 9 dwelling units (apartments)1,028 ft² (average per unit)

2-bedroom (all)

Height: 45 feet**FAR:** 0.99:1 (C-GEN allows 1:1 FAR for MU)**Income Category:** Market rate**Development Trends¹:** Nonresidential use converted to mixed use development**Criteria²:** 1, 3.c., 3.d.¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.

Project Identification: D (Entitled)**Project Description:** 15-unit residential condominium development

- CUP (CUP20-01002)
- Zone Change (ZON20-01001)
- Precise Plan of Development (PRE20-01007)
- Tentative Tract Map (DIV20-01001)

Year: 2020**Address:** 18419 Western Ave.**APN:** 4096-019-055**Lot Size:** 28,250 ft² parcel (0.65 acre)**Prior Use(s):** Vacant—undeveloped & unpaved**General Plan:** Existing: C-GEN (General Commercial)

Proposed: No change

- Allowable Density: N/A
- Expected Density: N/A

Zoning: Existing: C3-PP (Solely Commercial, Precise Plan Overlay)

Proposed: C2-PP (General Commercial District, Precise Plan Overlay)

Project Density: 23.1 du/ac (zone allows 17 units)**Units:** 5-unit building, 7-unit building, & 3-unit building, all 3-story1,522 to 1,650 ft²

3-bedroom (all)

Height: 32.5 feet (2 stories over ground-floor parking)**FAR:** 0.825:1 proposed (0.762:1 being considered to address staff concerns)**Income Category:** Market rate**Development Trends:** Residential development constructed on vacant commercially designated and zoned commercial property**Criteria²:** 1, 2¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Identification: E (Entitled)

Project Description: 48-unit townhouse development (condominiums) with retention of the church sanctuary—demolition of chapel, office, and preschool

- CUP (CUP19-00031)
- Zone Change (ZON19-00002)
- Waiver (WAV19-00002)
- Tentative Tract Map (DIV19-00010) (for condos, merger, and re-subdivision)

Year: 2020

Address: 2706 182nd St.

APN: 4095-020-030

Lot Size: 3.7 ac (original)

Proposed Lot 1 (Existing Church): 40,090 ft² parcel (0.92 acre)

Proposed Lot 2 (Proposed residential development): 121,710 ft² (2.79 ac)

Prior Use: Church sanctuary, chapel, church offices, and preschool (operational)

General Plan: Existing: Medium Density Residential District

- Allowable Density: 18.1 – 31 du/ac
- Expected Density: 23.25 du/ac

Proposed: No change

Zoning: Existing: A1/R2 (Light Agricultural District/Two-Family Residential)

Proposed: R-3 (Limited MFR District)

Project Density: 17.2 du/ac

- Percent of maximum allowable GP density: 0.56%
- Percent of expected GP density: 0.74%

Units: 48 three-story townhouse units in 9 buildings

Forty 3-bedroom units (1,725 ft²) and eight 4-bedroom units (2,257 ft²)

Parking: 144 spaces, including 10 guest spaces (required + provided)

Height: 35 feet

FAR: 0.72:1 (Max allowed is 0.6:1)

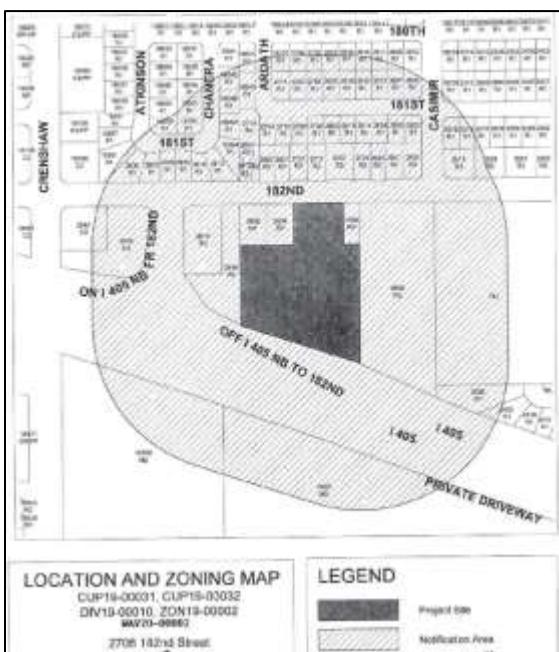
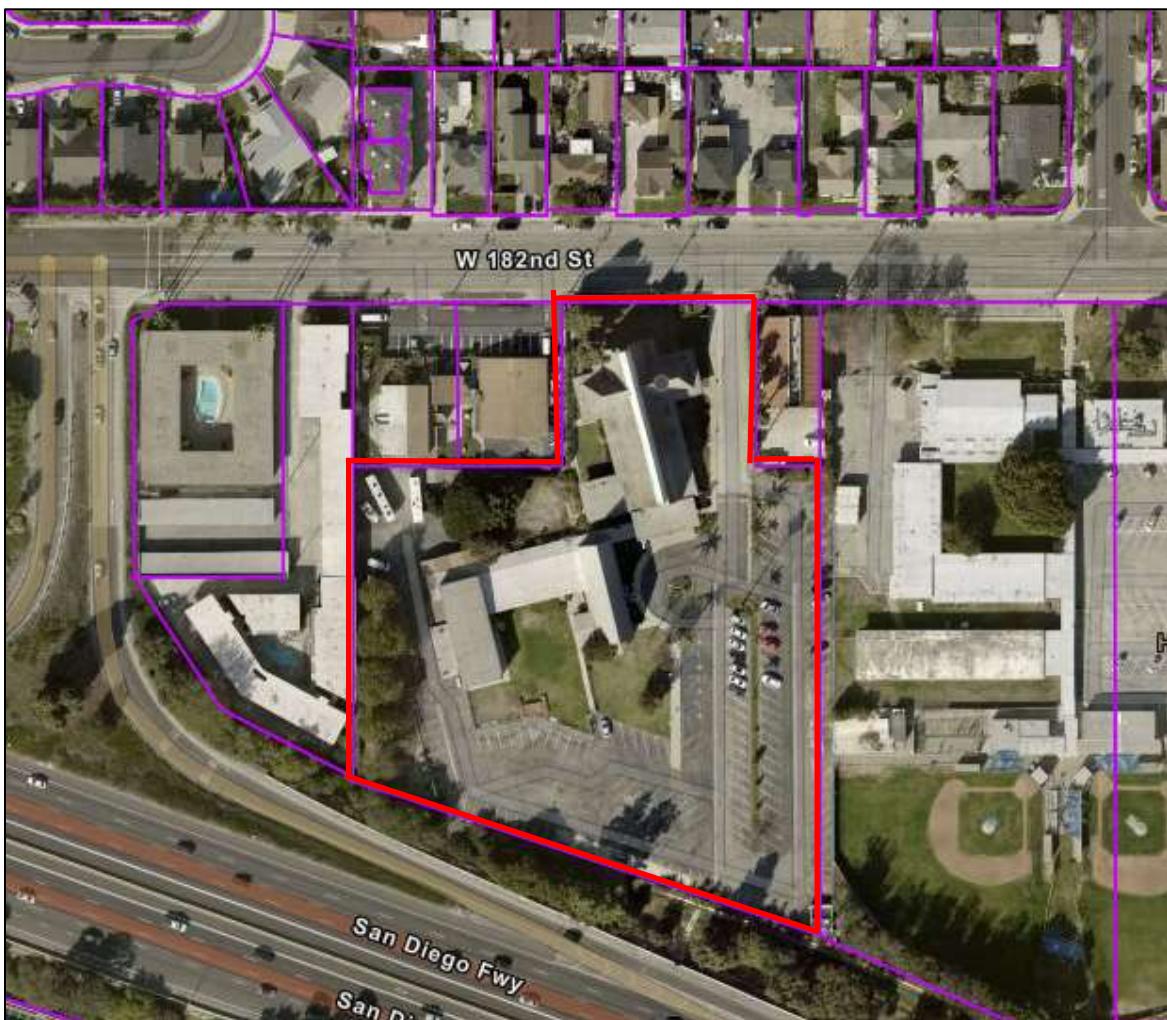
Income Category: Above-moderate income

Development Trends: Portion of a nonresidential use (church) converted to residential use; retention of a portion of the church facility, consistent with City's Religious Institution Housing Overlay Zone strategy

Criteria²: 1, other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Identification: F (Entitled)

Project Description: 6-unit townhouse condominium development

- CUP (CUP19-00006) (for condos & to exceed 0.6 FAR)
- Division of Lot (DIV19-00002)
- Planning Commission Review (PCR19-00001)

Date: 2019

Address: 1750 Manuel Ave. (in the Torrance Tract)

APN: 7359-001-038

Lot Size: 14,678 ft² parcel (0.34 acre)

Prior Use(s): Church building (still operating at the time of the application) (1941)

General Plan: Existing: Medium Density Residential

- Allowable Density: 18.1 – 31 du/ac
- Expected Density: 23.25

Proposed: No change

Zoning: Existing: R-3 (Limited MFR District)
Proposed: No change

Project Density: 17.8 du/ac

- Percent of maximum allowable: 57.4%
- Percent of expected: 76.6%

Units: 6 attached & detached townhouse units in 4 buildings
1,270 to 1,538 ft²
2-bedroom (all)

Height: 26.33 feet

FAR: 0.537:1

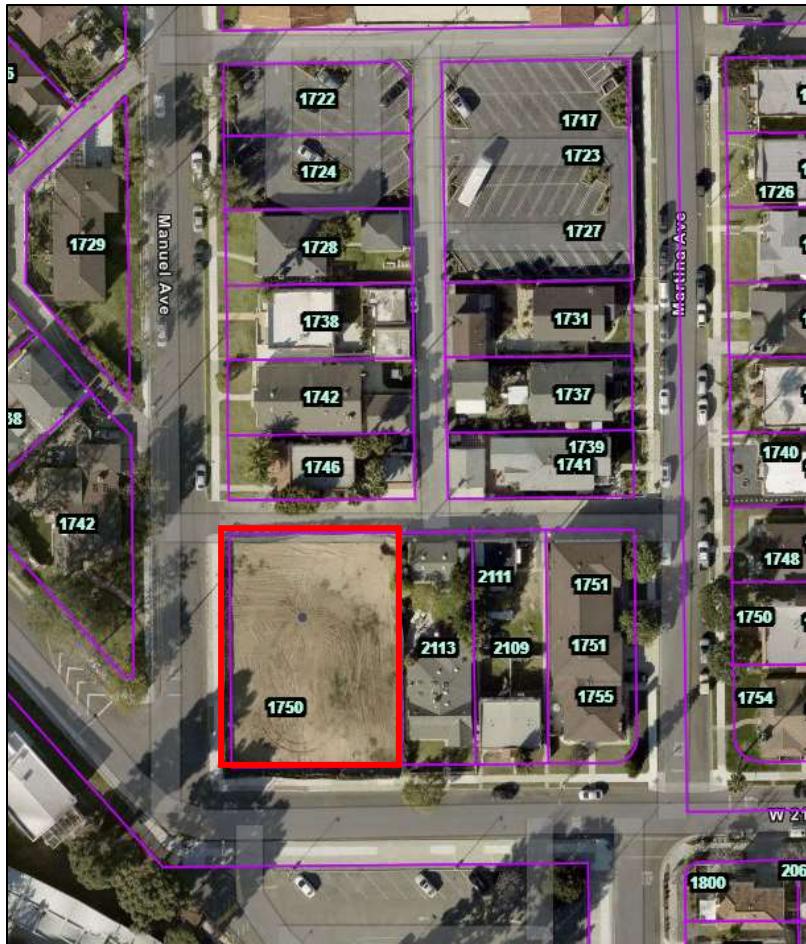
Income Category: Market rate

Development Trends¹: Nonresidential use converted to residential use

Criteria²: 1, 3.3.d., other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



CHAPTER 6: Housing Element

Project Identification: G (Constructed)

Project Description: Mixed Use development (restaurant, office, & retail) with 39 dwelling units, with commercial and parking garage on ground floor (project results in 30 new units, net)

- CUP (CUP18-00013)
- Division of Lot (DIV18-00008)

Date: 2018

Address: 1954 – 1978 Carson St. (Downtown Torrance/Torrance Tract)

APN: 7357-016-001 – 005 (5 parcels to be consolidated into 1)

Lot Size: 38,500 ft² (0.88 acre) (total 5 parcels to be consolidated)

Prior Use: Commercial building (beauty college) (1966), one SFR (1922), 2 detached units (1929), and a MU building with 6 dwelling units (1950); (total 9 dwelling units)

General Plan: Existing: C-CTR (Commercial Center)

- Allowable Density: N/A
- Expected Density: N/A

General Plan: Proposed: C-CTR (Commercial Center)

Zoning: Existing: D-T (Downtown Torrance District / Torrance Tract Overlay District)

- Allowable density: 43 du/ac
- Proposed: No change

Project Density: 38.5 du/ac

- Percent of maximum allowable zoning density: 89.5%
- Percent of expected GP density: N/A

Units:	39	dwelling	units	(apartments)	on	the	2nd	and	3rd	floors
	515			to			945			ft ²

Mix of 6 studios, 25 one-bedroom units, and 8 two-bedroom units

Parking: 70.4 required; 71 provided

Height: 38.5 feet

FAR: 1.21:1

Income Category: Above moderate

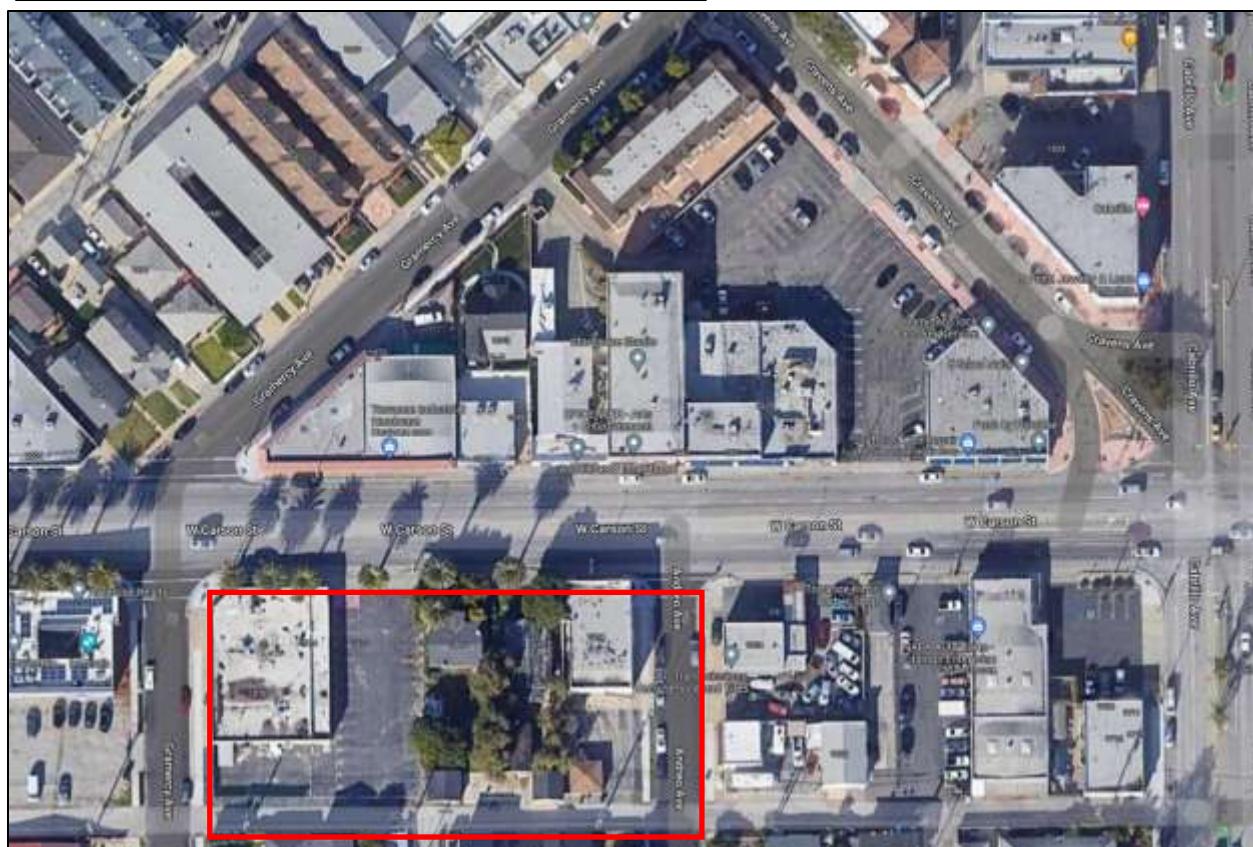
Development Trends: Nonresidential use and residential converted to mixed use development

Criteria²: 1, 3-3.d., 3.g., other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.

CHAPTER 6: Housing Element



Project Identification: H (Constructed)**Project Description:** 25-unit residential condominium development

- CUP (CUP16-00005)
- Tentative Tract Map
- Zone Change
- Waiver

Year: 2016**Address:** 20411 Earl St. (East Victor Precinct)**APN:** 7524-006-CONDO05 (current)**Lot Size:** 61,184 ft² parcel (1.4 acre) (1 parcel)**Prior Use(s):** 2 light industrial buildings (1960s), 4 tennis courts (West End Tennis & Racquet Club plus related parking)**General Plan:** Existing: R-LM (Low-Medium Density Residential)

- Allowable Density: 9.1 – 18 du/ac
- Expected Density: 13.5 du/ac

Proposed: No change**Zoning:** Existing: ML(M1-PP) Limited Manufacturing (Light Manufacturing w/Precise Plan Overlay)

Proposed: R-3 (up to 27 du/ac) (Rezoning required to be consistent with the GP designation and to allow residential)

Project Density: 17.8 du/ac

- Percent of maximum allowable: 98.9%
- Percent of expected: 139.9%

Units:	18	duplexes	&	7	stand-alone	units
	1,522		to		1,650	ft ²
	3-bedroom (all)					

Parking: 3 parking spaces/unit + 1 guest space/unit (required + provided)**Height:** 26 feet**FAR:** 0.6:1**Income Category:** Market rate**Development Trends¹:** Nonresidential use converted to residential use**Criteria²:** 1, 3, 3.d., other criteria unknown¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Identification: I (Constructed)**Project Description:** 16-unit residential condominium development

- Conditional Use Permit for condominiums CUP (CUP15-00009)
- Zone Change (ZON15-00002)
- Tentative Tract Map for parcel mergers & condominiums (DIV15-00004)
- Waiver (to exceed the maximum height of the R-P zone)

Year: 2015**Address:** 23625-23649 Arlington Ave.**APN:** Original not available**Lot Size:** 28,635 ft² parcel (0.66 acre), after consolidation (2 parcels consolidated into 1)**Prior Use(s):** Small mixed-use center with a residence, offices, & retail building (1964); and small retail center (1958)**General Plan:** Existing: R-OF (Residential-Office)

- Allowable Density: 18-31 du/ac
- Expected Density: 23.25 du/ac

Proposed: No Change

Zoning: Existing: C-5 (Conditional Commercial)

Proposed: R-P (Residential-Professional) (Rezoning required because residential uses are prohibited in the C-5 zone)

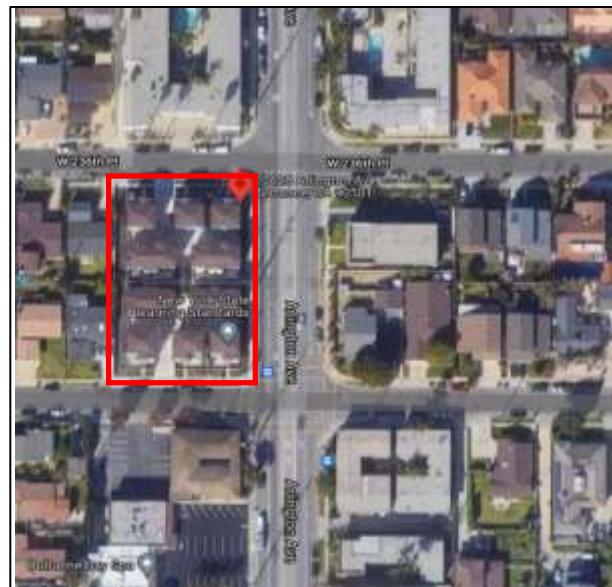
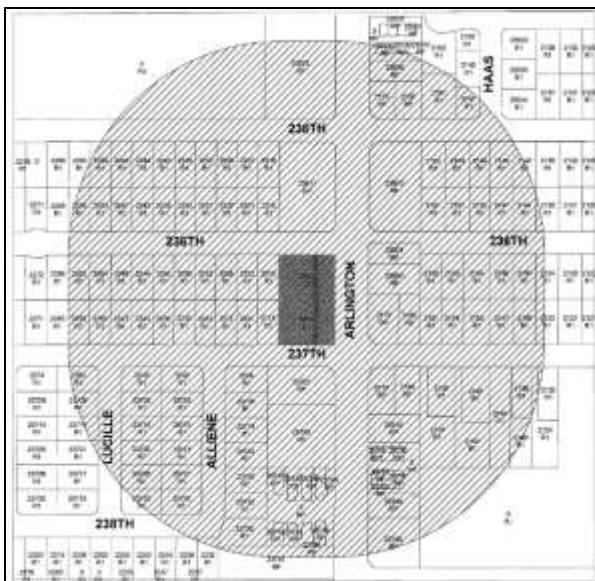
Project Density: 25 du/ac

- Percent of maximum allowable GP density: 80.7%
- Percent of expected GP density: 107.5%

Units: Four rows of two 2-unit buildings (total 16 units)1,073 ft² (each)

2-bedroom (all)

Parking: 32 spaces in garages, + guest parking (required + provided)**Height:** 31.83 feet (R-P zone allows 27' maximum—Waiver required)**FAR:** 0.60:1 **Income Category:** Market rate**Development Trends:** Nonresidential use converted to residential use**Criteria²:** 1, 3.d., other criteria unknown¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



View of project from Arlington

Project Identification: J (Constructed)**Project Description:** Mixed use development (horizontal) with 8 dwelling units + 2,700 ft² commercial office building

- CUP
- DVP (Development Permit)
- DIV (Division of Lot for Condominium purposes)
- Waiver (for setback for residential use)

Year: 2015**Address:** 24444 Hawthorne Blvd. (HBCSP, Walteria Sub-District, H-WT)**APN:** 7534-020-038**Lot Size:** 13,696 ft² parcel (0.32 acre)**Prior Use:** Recreational swimming school (1958)**General Plan:** Existing: General Commercial (allows MU development @ 1.0:1 FAR)

- Maximum Allowable Density: N/A
- Expected Density: N/A

Proposed): No change

Zoning: Existing: HBCSP, Walteria Sub-District, H-WT

- Maximum allowable density: 27 du/ac

Proposed: No change

Project Density: 25.4 du/ac

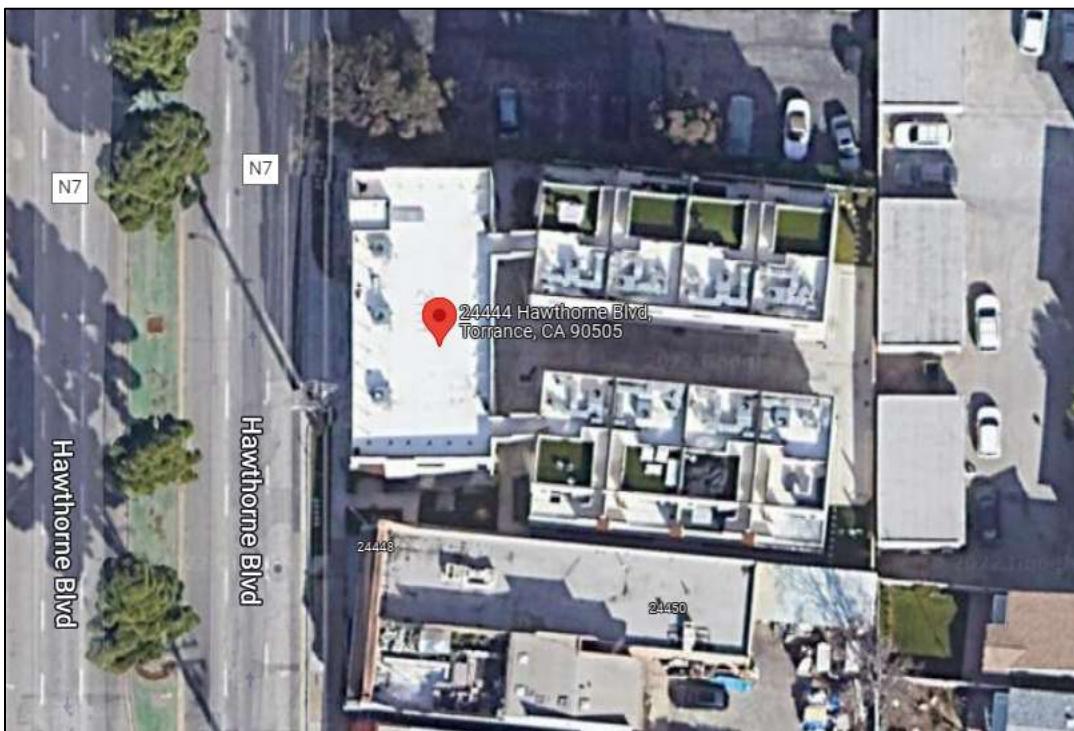
- Percent of maximum allowable zoning density: 94.1%
- Percent of expected GP density: N/A

Units:	Two 1,062 2-bedroom (all)	4-unit,	3-story	residential	buildings (all)
			ft ²		

Height: 36'-2" feet**FAR:** 0.82:1**Income Category:** Market rate**Development Trends¹:** Nonresidential use converted to mixed use development**Criteria²:** 1, 2, 3.d., other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are known for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Identification: K (Constructed)**Project Description:** Development of a total of 4 detached-style condominium units, 2 per lot

- CUP (CUP14-00001)
- DIV (DIV14-00001)
- ZON (ZON14-00001)
- GPA (GPA14-0001)

Year: 2014**Address:** 1008 Sartori Ave.**APN:** 7354-019-012, 7354-019-013**Size:** Two 4,140 ft² lots (Total of 8,280 ft² or 0.19 acre)**Prior Use:** Off-site parking facility (that served a community services facility—the Switzer Center—that ceased operation on the subject property in 2007)**General Plan:** Existing: C-CTR (Commercial Center)

Proposed: Medium Density Residential (requested by COT)

- Allowable Density: 18-31 du/ac
- Expected Density: 23.25

Zoning: Existing: P-1 (Open Area, Parking, Planting)

Proposed: R-3 (Limited MFR District)

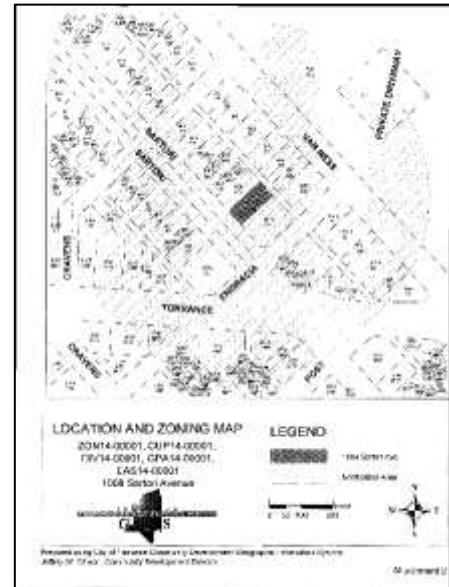
- Allowable density: 27 du/ac

Project Density: 21 du/ac

- Percent of maximum allowable GP density: 0.78%
- Percent of expected GP density: 90.0%

Units:	Four	2-story	detached	units
Unit	A	=	1,338	ft ²
3-bedroom (all)				

Parking: 8 garages spaces + 2 open guest spaces (required + provided)**Height:** 27 feet**FAR:** 0.65:1**Income Category:** Above-moderate (presumed, since no income category was proposed)**Development Trends¹:** Nonresidential use converted to residential use**Criteria²:** 1, 2, other criteria unknown.¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Description:	L (Constructed)
Date:	2013
Project Description:	Mixed use development with 44 dwelling units (workforce housing) and 3,700 ft ² of commercial (Cabrillo Family Apartments) <ul style="list-style-type: none"> • CUP (CUP13-00001) • Waiver (WAV13-00002) (for front setback)
Address:	1640 Cabrillo Ave. (Downtown Torrance)
APN:	7355-030-905 (City-owned property)
Size:	37,260 ft ² parcel (0.86 acre) (4 adjoining parcels consolidated into 1; purchased by the COT Redevelopment Agency in 2009 for workforce housing)
Prior Use(s):	Multiple structures housing showroom/office, vehicle maintenance, & storage (1940s – 1950s)
General Plan:	Existing: C-CTR (Commercial Center) <ul style="list-style-type: none"> • Allowable Density: N/A • Expected Density: N/A
Zoning:	Proposed: No change Existing: Downtown Project Area, Commercial Sector <ul style="list-style-type: none"> • Allowable Density:
Project Density:	Proposed: No change
Units:	51 du/ac 43 units for low- and very low-income households + 1 manager's apartment 560 to 1,087 ft ² (density bonus concession for unit size) 22 one-bedroom units, 8 two-bedroom units, and 14 three-bedroom units
Parking:	79 required; 79 provided (utilizes tandem parking, a density bonus concession)
Height:	35-44 feet
Income Category:	Low- and Very Low-Income households (tax credits, density bonus, RDA property)
Development Trends:	Nonresidential use converted to mixed use development
Criteria²:	1, 3.b., 3.d., other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Identification M (Constructed)

Project Description: Planned Development permit to establish development standards for a gated, 104-unit residential condominium development

- Zone Change (ZON03-00003)
- General Plan Amendment (GPA03-00002)
- Planned Development (PD03-00001)
- CUP (CUP03-00013)
- Tentative Tract Map for condominiums (TTM53091)

Year: 2003

Address: 2829 Maricopa Street

Lot Size: 435,746 ft² parcel (10 acres)

Prior Use(s): Industrial building, used for warehousing & distribution and a church (154,000 ft²)

General Plan: Existing: I-LT (Light Industrial)

Proposed: R-LM (Low-Medium Density Residential)

- Allowable Density: 9.1 – 18 du/ac
- Expected Density: 13.5 du/ac

Zoning: Existing: M-2 (Heavy Manufacturing) and P-1 (Planting and Parking)

Proposed: PD (Planned Development)

Project Density: 10.4 du/ac

- Percent of maximum allowable GP density: 57.8%
- Percent of expected GP density: 77.0%

Units:	104	detached	units	(patio	homes)
	2,638	to		3,206	ft ²

4-5 bedrooms

Height: 25'-9" to 34'-2"

FAR: 0.68:1

Income Category: Market rate

Development Trends: Nonresidential use converted to residential use

Criteria²: 1, 3.d., other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.

CHAPTER 6: Housing Element



Project Identification N (Constructed)

Project Description: This project is a proposal to construct a 160-unit condominium development that includes 60 senior units and 100 townhome units.

- Development Permit (DVPo2-00002)
- CUP (CUPo2-000020 & CUPo2-000021)
- Tentative Tract Map for condominiums (TTM53955)
- Waiver (WAVo2-00010—front setback)
- Variance (VARo2-00001—parking)

Year: 2002

Address: 3520 Torrance Boulevard

Lot Size: 5.37 acres

Prior Use(s): Secondary oil recovery site

General Plan: Existing: C-GEN (General Commercial)

- Allowable Density: N/A
- Expected Density: N/A

Proposed: No change

Zoning: Existing: HBCSP-DA-1 (Hawthorne Boulevard Corridor Specific Plan, Del Amo Sub-District 1)

Project Density: 29.8 du/ac

Units: 100 townhouse condominium units:

- 1,591 to 2,143 ft²
- 3 bedrooms

60 senior citizen condominium units:

- 442-613 ft²
- 2 floorplans are studio units; 1 floorplan is 1-bedroom unit

Height: 36.5' (townhouse development)

45.42" (senior citizen development)

FAR: 0.97:1

Income Category: Market rate

Development Trends: Nonresidential use converted to residential use

Criteria²: 1, 3.d., other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, as such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



Project Identification:	O (Entitled Project)
Year:	2020
Project Description:	Mixed use development with 53 senior residential condominium units and 1,500 ft ² of commercial area.
	<ul style="list-style-type: none"> • CUP (CUP15-00014) • Division of Lot (DIV15-00006 for condominium purposes) • Zone Change (ZON15-00003)
Address:	East side of Prairie Avenue approximately 100 Feet North Of 176th Street
APN:	4088-002-021
Size:	1.6 acre
Prior Use:	Vacant property
General Plan:	Existing: C-GEN (General Commercial) Proposed: No change
Zoning:	Existing: C-R (Restricted Commercial) Proposed: C3-PP (Soley Commercial with Precise Plan Overlay)
Project Density:	33.1 du/ac
Units:	53 units; commercial uses located on the first floor of the western-most building, with residential units on the second floor, and a two-story residential building to the east. <ul style="list-style-type: none"> • 16 one-bedroom units • 37 two-bedroom units
Parking:	72 required; 111 provided (92 spaces provided in a semi-subterranean garage with 19 surface parking spaces)
Height:	24 feet
FAR:	0.9:1 (max allowable is 1.0:1)
Income Category:	Market rate (above moderate)
Development Trends:	Nonresidential use converted mixed use development
Criteria²:	1, 2, other criteria unknown

¹Demonstrates how this project reflects the development trends identified in Section 4.1.2.2.

²Shows how the projects selected to demonstrate trends support the criteria used in the Sites Inventory. See Section 4.1.2.4 or Appendix C for the list of criteria used for the Sites Inventory. Note that not all the criteria are available for all the projects, such as land-to-improvement value, age, and other criteria are no longer available for constructed projects.



APPENDIX F: CORRESPONDENCE FROM PROVIDERS OF AFFORDABLE HOUSING

Hi Julia,

Following up on the question from yesterday. Yes we do plan to be affordable for the next 10 years.

Thank you,



Silvia Rangel | Community Manager
Harmony Court Senior Apartment Homes
Western National Property Management

CA DRE LIC#00838846

4502 186th Street | Redondo Beach, CA 90278



Please consider the environment before printing this email.


Julia

22520 Ocean houses people with Developmental Disabilities. We do plan to remain for at least the next 10 years.

Thank you,

David Dreben
Director of Property Management
Momentum
6430 Independence Ave
Woodland Hills, CA 91367
Office: [REDACTED]
Mobile: [REDACTED]
www.momentum4all.org



Note: This message is intended for the use of the person or entity to which it is addressed and may contain information that is privileged and confidential, disclosure of which is governed by applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, or distribution of this information is STRICTLY PROHIBITED. If you have received this message in error, please notify the sender immediately to arrange for return or destruction of these documents.

APPENDIX G: RESPONSE TO PUBLIC COMMENT

APPENDIX G

6th Cycle 2021-2029 Draft Housing Element – Public Comments and Responses

(Does not include comments/responses concerning associated environmental documents (ISND) or from/to State Department of Housing and Community Development (HCD))

Date Comment Received and Commenter	Comment Summary	Draft Responses to be released prior to June 14, 2022, City Council Public Hearing

CHAPTER 6: Housing Element

<p>3.15.2021 Aidan Schwing, resident</p> <p>3.15.2021 Kari Gallegos, resident</p> <p>3.15.2021 Prabhu Reddy, resident</p> <p>3.15.2021 Scarlett Davis, resident</p> <p>3.15.2021 Sunny Zhou, resident</p> <p>3.16.2021 Ciera Coronado, resident</p> <p>3.16.2021 Margaret Gilbert, resident</p> <p>3.21.2021 Aron Sanchez, resident</p>	<p>The following comment letter was a form letter received from multiple residents. The dates submitted and commenter name is listed in the column to the left. The following are the comments and concerns listed in the letter:</p> <p>Commented concern about the region's affordable housing shortage and its impact on the future of the city.</p> <p>Commented about frustration by homelessness issues, by the burden that displacement and gentrification place on neighbors, and by policies that promote exclusion and housing scarcity in neighborhoods.</p> <p>Commented about opinion that exclusionary zoning and land use practices have led to an undersupply of affordable housing near transit.</p> <p>Commented about pattern of redlining that divided city's neighborhoods by race and income.</p> <p>Commented that a new approach is needed to solve city and region's housing crisis.</p> <p>Suggests the following:</p> <ul style="list-style-type: none"> • Incorporating an estimate of the likelihood of development and the net new units that can be developed for inventory sites • Using and HCD-recommended "safe Harbor" methodology for forecasting future ADU production • Prioritizing high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing in order to affirmatively further fair housing. • Include the HCD-recommended buffer of at least 15-30% extra capacity in the sites inventory to avoid violating the No Net Loss requirement. • Adopt policies legalizing more housing, making housing easier to build, funding affordable housing and ending homelessness, and strengthening tenants' rights. 	<p>Following are responses to comments in the letter:</p> <ul style="list-style-type: none"> • The Sites Inventory is based on net potential units. The assumed capacity is below actual potential capacity and is supported (in the revised document) by a new evaluation of trends. Programs are provided to facilitate development at or above assumed capacity; this provides a reasonable and conservative estimate of potential units. • The City calculated the average number of ADU permits issued for 2018, 2019, & 2020 to estimate the production of ADUs during the 6th Cycle. The average is 68.7, but the City used 60 ADUs per year as the estimate, which the City believes is a conservative estimate. Note that this is a reduction from the 100 ADU/year assumed in the initial submittal to HCD. The City used the methodology for ADUs as provided by SCAG and approved by HCD for calculating affordability estimates. • One of the City's strategies is to promote new housing for all income levels on corridors that offer transit and are near or within employment areas and offer other quality-of-life amenities such as parks, schools, and shopping and services that are important for residents. Per the analysis distribution of RHNAs by TCAC • Opportunity Area Category conducted for AFFH evaluation because • most of Torrance is within a "Highest Resource" or "High Resource" category, most RHNAs are located within one of those two categories. Over 56 percent are located within the Highest Resource category, and nearly 40 percent are located within the High Resource category. Similarly, over 60 percent of census tracts in the City are within the Highest Resource category, and over 30 percent are within the High Resource category. • The Torrance Sites Inventory has a total buffer 31%; when entitled and pipeline projects and estimated ADUs are included, the buffer is 53.4 percent. • Regarding legalizing more housing and making housing easier to build; funding affordable housing, ending homelessness, and strengthening tenants' rights: <ul style="list-style-type: none"> ○ The City's Housing Element includes many programs to allow for and incentive increased production of housing in Torrance. Through implementation of the Housing Element, the City will significantly increase opportunities for additional housing via programs that will allow residential development by-right in areas that currently are not designated or zoned to allow it and
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CHAPTER 6: Housing Element

		<p>reduce identified constraints. For example, densities will be increased; rezonings will occur to allow by-right construction on properties that are currently not zoned for residential development; and an overlay will be created and applied to certain sites to allow by-right stand-alone residential development in addition to mixed use projects. Another program will add an overlay to religious institutions that would allow for lower-income housing to be constructed by-right on properties owned and operated by religious institutions. Since many religious institutions are located in and near established neighborhoods, this strategy also promotes affordable housing in high-opportunity neighborhoods.</p> <ul style="list-style-type: none">○ The City's Housing Element includes programs and objectives to fund affordable housing to the extent feasible. The City will continue to pursue grants (such as utilizing federally assisted funding the City used for the Cabrillo Family Apartments development in 2015, which provided 43 affordable units) and will apply for eligible programs. The City also will use other mechanisms that can result in reduced development costs, such as using incentives, development agreements, process streamlining, etc. The City notes that funding for affordable housing has been significantly impacted due to the state's dissolution of Redevelopment. The City's Redevelopment Agency funded many affordable housing units in Torrance in the past, from very low to moderate units. Without a replacement for funding under Redevelopment, funding for affordable housing will remain an ongoing constraint for cities and counties in California.○ The City prepared and has adopted the Torrance <i>Plan to Prevent and Combat Homelessness</i> available at: www.TorranceCA.Gov/Homeless. This multi-year plan was created as a guiding document after an extensive review of other community homeless plans, researching promising practices, speaking to industry leaders, and listening to community inputs. The City's Housing Element Housing Plan includes a program to continue its implementation and extend the plan for another 3 years by June 2024. Implementation of the plan includes the City's recent approval of a temporary homeless shelter on City-owned property at the Civic Center. The City established the Social Services Commission to address
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CHAPTER 6: Housing Element

		<p>issues concerning the City's veterans, homeless population, adults with developmental disabilities and children with special needs.</p> <ul style="list-style-type: none">○ The City currently actively enforces fair housing laws and promotes and supports renters' (tenants') rights. For example, following the passage of AB 1482 (Tenant Protections Act of 2019), the Torrance City Council acted swiftly to stem a surge of arbitrary, no-fault evictions as a number of landlords threatened to or actually served tenants with eviction notices in advance of the implementation of the new law Ordinance 3854 that was approved by the City Council on October 29, 2019. Torrance is part of the CDBG Urban County program, which contracts with the Housing Rights Center (HRC) for fair housing services. The HRC The Housing Rights Center investigates and resolves discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. They also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. Additional measures per the commenter are under further consideration by the City.
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CHAPTER 6: Housing Element

3.29.2021 Morgan Bennyworth 3.30.2021 Yazmine Mihojevich, resident	<p>The following comment letter was a form letter received from multiple residents. The dates submitted and commenter name is listed in the column to the left. The following are the comments and concerns listed in the letter:</p> <p>Concerned with policies that ban apartments in much of the city, as this promotes housing scarcity, high rents, exclusion, and displacement in neighborhoods.</p> <p>Expressed concern that apartments are banned on over 80% of residentially-zoned land in LA County. Concerned this had led to undersupply of affordable medium and high-density housing near jobs and transit. Concern this has perpetuated segregated living patterns, lack of access to opportunity, and the exclusion of BIPOC individuals and communities.</p> <p>Concerned that high median home values, scarce affordable apartments and single-family zoning effectively guarantee that high-opportunity neighborhoods remain restricted to wealthy households who tend to be white</p> <p>Would like to see the city legalize apartments citywide.</p>	<p>Following are responses to comments in the letter:</p> <p>Regarding legalizing apartments citywide, the City's Housing Element includes many programs to allow for and incentive increased production of housing in Torrance. Through implementation of the Housing Element, the City will significantly increase opportunities for additional housing via programs that will allow residential development by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints. For example, densities will be increased; rezonings will occur to allow by-right construction on properties that are currently not zoned for residential development; and an overlay will be created and applied to certain sites to allow by-right stand-alone residential development in addition to mixed use projects. Another program will add an overlay to religious institutions that would allow for lower-income housing to be constructed by-right on properties owned and operated by religious institutions. Since many religious institutions are located in and near established neighborhoods, this strategy also promotes affordable housing in high-opportunity neighborhoods. While this does not legalize apartments everywhere, it greatly expands opportunities for apartments throughout Torrance. The corridors were selected to consider adjacent uses to mitigate negative externalities on new residents and to promote use of transit and easy access to goods and services needed by residents. The Housing Element also includes programs to promote affordable housing in neighborhoods that are typically single-family by facilitating construction of ADUs, thereby increasing opportunities for additional housing that is affordable to all income levels.</p>
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CHAPTER 6: Housing Element

<p>4.27.2021 From unknown commenter (redacted) Sent in advance of Planning Commission Public Workshop, April 28, 2021</p> <p>4.28.21 Aziz Fellague, resident</p> <p>4.28.21 Name redacted</p> <p>4.28.21 Keiko Thomas</p> <p>4.28.21 Name redacted</p>	<p>The following comment letter was a form letter received from multiple residents. The dates submitted and commenter name is listed in the column to the left. The following are the comments and concerns listed in the letter:</p> <p>Expressed concern that Torrance continues to experience a severe housing crisis.</p> <p>Stated that the City has added over 9,000 jobs since 2010 and housing stock only increased by a little over 200 homes during the same time period.</p> <p>Expressed concern that apartments are banned on 75% of Torrance's residentially-zoned land.</p> <p>Stated that just under 40% of Torrance households are burdened by high housing costs.</p> <p>Stated that homelessness has increase nine times since 2013.</p> <p>Urges the city to adopt a transformative housing element that furthers the following goals:</p> <ul style="list-style-type: none"> • Legalizes more homes and makes homes easier to build • Funds affordable housing • Addresses and ends homelessness • Strengthens Renters Rights 	<p>Following are responses to comments in the letter:</p> <ul style="list-style-type: none"> • The City's Housing Element includes many programs to allow for and incentive increased production of housing in Torrance. Through implementation of the Housing Element, the City will significantly increase opportunities for additional housing via programs that will allow residential development by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints. For example, densities will be increased; rezonings will occur to allow by-right construction on properties that are currently not zoned for residential development; and an overlay will be created and applied to certain sites to allow by-right stand-alone residential development in addition to mixed use projects. Another program will add an overlay to religious institutions that would allow for lower-income housing to be constructed by-right on properties owned and operated by religious institutions. Since many religious institutions are located in and near established neighborhoods, this strategy also promotes affordable housing in high-opportunity neighborhoods. • The City's Housing Element includes programs and objectives to fund affordable housing to the extent feasible. The City will continue to pursue grants (such as utilizing federally assisted funding the City used for the Cabrillo Family Apartments development in 2015, which provided 43 affordable units) and will apply for eligible programs. The City also will use other mechanisms that can result in reduced development costs, such as using incentives, development agreements, process streamlining, etc. The City notes that funding for affordable housing has been significantly impacted due to the state's dissolution of Redevelopment. The City's Redevelopment Agency funded many affordable housing units in Torrance in the past, from very low to moderate units. Without a replacement for funding under Redevelopment, funding for affordable housing will remain an ongoing constraint for cities and counties in California. • The City prepared and has adopted the <i>Torrance Plan to Prevent and Combat Homelessness</i> available at: www.TorranceCA.Gov/Homeless. This multi-year plan was created as a guiding document after an extensive review of other community homeless plans, researching promising practices, speaking to industry leaders, and listening to community inputs. The City's Housing Element Housing Plan includes a program to
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CHAPTER 6: Housing Element

		<p>continue its implementation and extend the plan for another 3 years by June 2024. Implementation of the plan includes the City's recent approval of a temporary homeless shelter on City-owned property at the Civic Center. The City established the Social Services Commission to address issues concerning the City's veterans, homeless population, adults with developmental disabilities and children with special needs.</p> <ul style="list-style-type: none">• City currently actively enforces fair housing laws and promotes and supports renters' (tenants') rights. For example, following the passage of AB 1482 (Tenant Protections Act of 2019), the Torrance City Council acted swiftly to stem a surge of arbitrary, no-fault evictions as a number of landlords threatened to or actually served tenants with eviction notices in advance of the implementation of the new law Ordinance 3854 that was approved by the City Council on October 29, 2019. Torrance is part of the CDBG Urban County program, which contracts with the Housing Rights Center (HRC) for fair housing services. The HRC The Housing Rights Center investigates and resolves discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. They also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. Additional measures per the commenter are under further consideration by the City.• The City prepared and has adopted the Torrance <i>Plan to Prevent and Combat Homelessness</i> available at: www.TorranceCA.Gov/Homeless. This multi-year plan was created as a guiding document after an extensive review of other community homeless plans, researching promising practices, speaking to industry leaders, and listening to community inputs. The City's Housing Element Housing Plan includes a program to continue its implementation and extend the plan for another 3 years by June 2024. Implementation of the plan includes the City's recent approval of a temporary homeless shelter at the Civic Center. The City's Social Services Commission addresses issues concerning the City's veterans, homeless population, adults with developmental disabilities and children with special needs.
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CHAPTER 6: Housing Element

<p>4.24.21 From Tieira Ryder. Sent in advance of Planning Commission Public Workshop, April 28, 2021</p>	<p>Commented that affordable housing should include both rent and homeownership options for the working class, senior, students and those with low or no income.</p> <p>Stated that it's time to end redline, racist and classist zoning in LA County that has over 60,000 unhoused residents.</p> <p>Expressed that everyone deserves housing that we can afford, rent was not meant to take more than 30% of a resident's income, with some rent taking over 80% of a resident's income, and that's not acceptable.</p> <p>Stated that in the last 10 years in SoCal, rent has increased by over 65%, and during that time period the number unhoused resident increased by over 50%.</p> <p>Expressed support for a variety of housing types, including affordable tiny and small homes, apartments, condos, and townhomes.</p> <p>Stated that the state can capture land from local sub cities that do not meet housing element requirements.</p>	<p>Programs in the City's Housing Element are intended to increase both the number and type of units that will be constructed in Torrance, as well as provide for a wide range of income levels and those with special needs.</p>
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CHAPTER 6: Housing Element

4.27.21 Chris Dreike, resident	<p>Encouraged Torrance to join with any legal actions against SCAG, HCD, and the Legislature regarding the false RHNA numbers, to repeal SB828, and SB35.</p> <p>As part of comment, provided a one-page analysis of housing needs for the State of California for the next 10 years. The following are the points made in the commenter's analysis:</p> <ul style="list-style-type: none">• Stated California's population grew by only .2% in 2019, which equates to an increase of 80,000 people.• LA County, including Torrance, Redondo, Hermosa, Manhattan and Carson all lost population.• Commenter stated that we are building more housing than we need, and more apartments than single family homes. Stated that the market is looking for single family homes.• Provided a mathematical analysis for the conclusion that HCD's RHNA calculations are greatly overestimated both Statewide and for the SCAG region.	<p>Following are responses to comments in the letter:</p> <ul style="list-style-type: none">• The City filed an appeal to SCAG to challenge its RHNA allocation. Unfortunately, the City was not successful, nor were the majority of cities that filed appeals.• The City carefully considers all state legislation that impacts it and its authority as a charter city and takes action as appropriate.
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CHAPTER 6: Housing Element

4.27.21 Prabhu Reddy	<p>Stated the commenter was writing on behalf of Torrance for Everyone and noted that 4 documents were attached to her email:</p> <ol style="list-style-type: none"> 1. Brutal Facts: Document lays out commenter's concerns about Torrance's housing crisis including that more than 45% of Torrance renters are cost-burdened, and a 9-times increase in homelessness since 2013. 2. Our Platform: Document includes 17 policies across 4 key areas: <ol style="list-style-type: none"> a. Legalize more homes b. Fund affordable housing c. Support unhoused neighbors d. Strengthen renters' rights 3. Public Outreach: Intent is to remind the City of public outreach obligations. 4. Site Inventory Analysis: Includes letter prepared by Abundant Housing LA summarizing state law, and points to the "affirmatively furthering fair housing" requirement, especially the requirement to distribute low-income housing across the City of Torrance. 	<p>Following are responses to comments in the letter:</p> <ol style="list-style-type: none"> a. The City's Housing Element includes many programs to allow for and incentive increased production of housing in Torrance. Through implementation of the Housing Element, the City will significantly increase opportunities for additional housing via programs that will allow residential development by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints. For example, densities will be increased; rezonings will occur to allow by-right construction on properties that are currently not zoned for residential development; and an overlay will be created and applied to certain sites to allow by-right stand-alone residential development in addition to mixed use projects. Another program will add an overlay to religious institutions that would allow for lower-income housing to be constructed by-right on properties owned and operated by religious institutions. Since many religious institutions are located in and near established neighborhoods, this strategy also promotes affordable housing in high-opportunity neighborhoods. b. The City's Housing Element includes programs and objectives to fund affordable housing to the extent feasible. The City will continue to pursue grants (such as utilizing federally assisted funding the City used for the Cabrillo Family Apartments development in 2015, which provided 43 affordable units) and will apply for eligible programs. The City also will use other mechanisms that can result in reduced development costs, such as using incentives, development agreements, process streamlining, etc. The City notes that funding for affordable housing has been significantly impacted due to the state's dissolution of Redevelopment. The City's Redevelopment Agency funded many affordable housing units in Torrance in the past, from very low to moderate units. Without a replacement for funding under Redevelopment, funding for affordable housing will remain an ongoing constraint for cities and counties in California.
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CHAPTER 6: Housing Element

		<ul style="list-style-type: none">c. The City prepared and has adopted the Torrance <i>Plan to Prevent and Combat Homelessness</i> available at: www.TorranceCA.Gov/Homeless. This multi-year plan was created as a guiding document after an extensive review of other community homeless plans, researching promising practices, speaking to industry leaders, and listening to community inputs. The City's Housing Element Housing Plan includes a program to continue its implementation and extend the plan for another 3 years by June 2024. Implementation of the plan includes the City's recent approval of a temporary homeless shelter on City-owned property at the Civic Center.d. The City has utilized a variety of methods for public outreach. They are summarized in Section 1 of the Housing Element, while Appendix A includes documentation of the various efforts.e. The revised Housing Element significantly expands discussion regarding preparation of the Sites Inventory and adds many new sites based on public interest. Refer to the responses to the Abundant Housing LA Letter—they are not repeated here.
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CHAPTER 6: Housing Element

<p>11.1.21 Lisa Hirsch Marin, Our Future LA Coalition</p>	<p>Commented that the reason for the letter is multiple concerns about the housing crisis. Provided a considerable amount of background data, summarized here:</p> <ul style="list-style-type: none"> • Black and Latino residents feel housing crisis more than most. • Black households have 1.12% the wealth of white households and Latino households have less than 5% • Black people make up 8% of the county population but 33.7% of people experiencing homelessness • Black and Latino neighborhoods face disproportionately higher eviction threats • 25% of AAPI populations are considered severely cost-burdened <p>Stated that decades of racist policies have not been eradicated.</p> <p>The pandemic exacerbated these disproportionate impacts resulting in higher disease and death rates among Black and Latino people.</p> <p>LA County ranks last in counties in the US in housing affordability, overcrowding and unsheltered homelessness. Stated that LA County needs to double the amount of affordable homes built by 2030.</p> <p>Comments specific to the Torrance Housing Element are detailed below:</p> <ol style="list-style-type: none"> 1. Protections: <ol style="list-style-type: none"> a. The housing element should expand just-cause eviction protections to cover all tenants and establish a corresponding enforcement program. b. The housing element should implement a local RSO or strengthen/reduce the annual allowable rent increase for the existing RSO program. c. The housing element should codify a tenant's right to counsel in an eviction proceeding. d. The housing element should create a permanent tenant education program to inform tenants of their rights and how to access eviction defense resources. e. The housing element should create and implement a tenant anti-harassment ordinance combined with enforcement resources. 2. Preservation: <ol style="list-style-type: none"> a. The housing element must do more to prioritize rezoning – with value capture – in high-resource neighborhoods which are transit-and job-rich, including single-family zoned areas. This is 	<p>a. Protections:</p> <p>b. a.–e.: The City currently actively enforces fair housing laws and promotes and supports renters' (tenants') rights. For example, following the passage of AB 1482 (Tenant Protections Act of 2019), the Torrance City Council acted swiftly to stem a surge of arbitrary, no-fault evictions as a number of landlords threatened to or actually served tenants with eviction notices in advance of the implementation of the new law Ordinance 3854 that was approved by the City Council on October 29, 2019. Torrance is part of the CDBG Urban County program, which contracts with the Housing Rights Center (HRC) for fair housing services. The HRC The Housing Rights Center investigates and resolves discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. They also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords.</p> <p>c. The City does not currently propose to adopt specific ordinances proposed by the commenter, although the City may consider them as part of its ongoing implementation program to enforce fair housing.</p> <p>d. Preservation:</p> <p>e. The City's Housing Element includes many programs to allow for and incentive increased production of housing in Torrance. Through implementation of the Housing Element, the City will significantly increase opportunities for additional housing via programs that will allow residential development by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints.</p> <p>f. The Sites Inventory does not include parcels containing RSP units. Per Program 16 in the Housing</p>
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CHAPTER 6: Housing Element

	<p>necessary to expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.</p> <ul style="list-style-type: none"> b. The housing element should exclude parcels containing RSP housing units in the housing element's site inventory. c. The housing element should require that no net loss provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program. d. The housing element should institute local programs and funding sources for preservation of existing affordable housing. <p>3. Prioritization of affordable housing</p> <ul style="list-style-type: none"> a. The housing element should utilize a value capture mechanism, such as inclusionary zoning, to locally fund and/or incentivize affordable housing. b. The housing element should prioritize creation of affordable housing on public land. c. The housing element should streamline affordable housing production. d. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas. e. The housing element should include programs for 100% affordable housing zoning overlays, and should ensure that these overlays apply to high-opportunity areas currently zoned R1. 	<p>Element, the City will amend the Zoning Code to require the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in State Density Bonus Law.</p> <ul style="list-style-type: none"> g. Per Program 1, the City will develop a procedure to monitor the development of vacant and non-vacant sites in the Sites Inventory and ensure that adequate sites are available to meet the remaining RHNA by income category to implement "no net loss" requirements pursuant to SB 166. The City will monitor and report on the "no net loss" requirement on an annual basis. h. Preserve existing affordable housing i. Prioritization: j. The Housing Element includes a program to investigate the development of an "inclusionary housing" ordinance that could serve to further the City's intentions to build more affordable housing throughout the City at locations in addition to the recommended housing sites in the draft housing element. The City's development of an "inclusionary housing" ordinance is outlined in Program 3 of the draft housing element. k. The City has a history of facilitating the construction of affordable housing on City-owned property, especially via the former Redevelopment Agency. The Housing Element already includes a policy to "Prioritize development of housing for moderate- and lower-income households on City-owned property." (Policy H.2.9) l. The Housing Element includes programs to streamline the production of housing via updates to the Zoning Code. m. & e. The Housing Element includes a program to add an overlay to religious institutions that would allow for 100% lower-income housing to be constructed by-right on properties owned and operated by religious institutions. Since many religious institutions are
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	<p>4. Site Capacity Assessment</p> <ul style="list-style-type: none"> a. The housing element should estimate and report both the likelihood of development and the net new units if developed of inventory sites, both vacant and nonvacant. A table was provided in the letter, showing how the draft housing element will fall short of the RHNA goal, by 5,020 units of realistic capacity. The City must <i>fairly</i> estimate the likelihood of development for all parcels on the suitable sites inventory. b. The housing element should report the proportion of sites from the previous housing element's inventory that were developed during the previous planning period, and HCD-recommended methodologies and data sources should be used in order to conduct a thorough "analysis of sites' realistic development capacity. c. The housing element assigns more than 50% of the lower-income RHNA target to nonvacant sites, but should use statistical methods (e.g., surveying a random sample of owners of nonvacant sites) to determine that the sites' existing uses are likely to be discontinued during the planning period. d. A buffer of at least 15-30% extra capacity is not included in the housing element site inventory. This capacity buffer is especially necessary in order to accommodate the lower-income RHNA target. (See No Net Loss (NNL) section of 4A. e. The housing element should provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and should adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly. f. The housing element should commit to a mid-cycle review to verify the housing element's assumptions about development probabilities. 	<p>located in and near established neighborhoods, including those zoned R-1, this strategy also promotes affordable housing in high-opportunity neighborhoods. The City does not propose other overlays that apply to R-1 zoned property.</p> <p>n. Site Capacity Assessment:</p> <ul style="list-style-type: none"> o. The Sites Inventory provides the net number of units that are estimated to be constructed on vacant and non-vacant property. Through implementation of the Housing Element, the City will significantly increase opportunities for additional housing via programs that will allow residential development by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints. For example, a program to codify target densities identified in the Land Use Element will meaningfully increase overall housing production (e.g., disincentivize development of housing at densities below densities in the Land Use Element). Other programs will increase densities; rezone properties to allow by-right construction on properties that are currently not zoned for residential development; and an overlay will be created and applied to certain sites to allow by-right stand-alone residential development in addition to mixed use projects. Another program will add an overlay to religious institutions that would allow for lower-income housing to be constructed by-right on properties owned and operated by religious institutions. Also, based on a review of 15 recently entitled or constructed residential developments as well as input from local developers and property owners, continued development of housing on existing non-residentially zoned property is both a substantiated trend and has significant interest from both developers and property owners. The City's Sites Inventory provides a total buffer of 31%, and development of a procedure to monitor the development of vacant and non-vacant sites in the Sites Inventory will ensure that adequate sites are available to meet the remaining RHNA by income
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CHAPTER 6: Housing Element

		<p>category to implement “no net loss” requirements pursuant to SB 166. The City will monitor and report on the “no net loss” requirement on an annual basis, not just mid-cycle, so that timely adjustments can be made if necessary. The City respectfully disagrees that its RHNA goal falls short by 5,020 units of realistic capacity.</p> <p>p. As part of the Housing Corridor Study, which informs the Housing Element update and provides 33.9% of the sites for the City’s RHNA, a Feasibility Study of potential development prototypes and a pro forma financial feasibility analysis were conducted to determine project feasibility for the development prototypes. The financial factors for the prototypes were generally developed based on the industry-standard cost factors, which reflected a review of site design requirements associated with various zoning districts, and historic property sale data. The analysis was also informed by input from development and design professionals active in the South Bay and comparable southern California markets. The prototypes were evaluated based on the City’s existing parking standards. The fiscal analysis determined that, in many cases, densities could be achieved if the parking standards were reduced. This finding will inform finalization of the development and design standards for the study area so that rezoning of the HCS sites facilitates financial feasibility. This analysis also will inform the revision to other development standards to implement the Zoning Code to facilitate financial feasibility. The City undertook this level of design and fiscal analysis to incentivize development of housing. The Sites Inventory (in the revised document) has been expanded to include information on existing uses, land vs. improvement value, age of the structures, local knowledge regarding underutilization, and interest from the public regarding redevelopment. In addition, a review of 15 recently entitled or constructed residential developments as well as by</p>
5. Affirmatively Furthering Fair Housing	a. The housing element should meaningfully increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is	

CHAPTER 6: Housing Element

	<p>low.</p> <ul style="list-style-type: none"> b. The housing element should meaningfully reduce the concentration of lower-income households in areas with significant exposure to noise/pollution and commit to reducing/addressing noise and pollution. c. The housing element should ensure community-serving investment in historically disinvested areas. This includes place-based strategies that create a net gain of affordable housing and stop displacement, prioritize environmental justice, enhance community health, and strengthen equitable community leadership in land use planning. d. The housing element should include a thorough analysis of local patterns in socioeconomic/racial segregation and integration, including patterns of overt racial or ethnic discrimination in the housing and land development market. e. The housing element should adequately prioritize high-opportunity census tracts and well-resourced areas (e.g. near transit, jobs, schools, parks, etc.) when selecting sites for lower-income housing opportunities. f. The housing element should adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built. g. The jurisdiction did not adequately solicit public feedback and commentary on the housing element in a way that accurately reflects the jurisdiction's socioeconomic makeup. 	<p>input from local developers and property owners indicates that continued development of housing on existing non-residentially zoned property is both a substantiated trend and has significant interest from both developers and property owners. Programs to reduce impediments and incentivize development of housing will significantly increase opportunities for additional housing by allowing residential development by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints.</p> <ul style="list-style-type: none"> q. See responses to (a) and (b) above. r. The 1st submittal of the Housing Element did include a buffer of over 30% for all income categories. The Sites Inventory in the revised draft Housing Element has a total buffer 31%; when entitled and pipeline projects and estimated ADUs are included, the buffer is 53.4 percent. s. The revised Housing Element added a new section providing information on historical trends to support the capacity estimates. t. Per Program 1, the City will develop a procedure to monitor the development of vacant and non-vacant sites in the Sites Inventory and ensure that adequate sites are available to meet the remaining RHNA by income category to implement "no net loss" requirements pursuant to SB 166. The City will monitor and report on the "no net loss" requirement on an annual basis rather than waiting until a mid-cycle review. u. v. Affirmatively Furthering Fair Housing: w. The Sites Inventory as proposed will meaningfully increase the concentration of lower income households within the City, including areas where the existing concentration of lower-income households is low throughout the City. Because the City's residentially designated areas are built out, sites large enough to provide for lower-income housing are challenging to identify. Several used include rezoning
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CHAPTER 6: Housing Element

		<p>non-residentially zoned properties to allow residential development via an overlay (see the Housing Corridor Study described in the Housing Element, adding an overlay to allow affordable housing by-right on property owned and operated by religious institutions, which often are in or near neighborhoods of predominantly SFR properties, and facilitating ADUs. The City has adopted an ordinance consistent with SB 9, which also may result in additional affordable units.</p> <ul style="list-style-type: none">x. The Torrance Noise Element identifies goals, policies, and programs to mitigate noise impacts. The City has a Noise Ordinance that it actively enforces to mitigate noise violations. Preparation of an Environmental Justice Element is a future action the City will undertake that will address environmental hazards that disproportionately affect lower-income neighborhoods in Torrance.y. Policy H.1.7 commits the City to employ place-based strategies in making neighborhood improvements, where place-based strategies address the physical, social, structural, and economic conditions of a community that affect the well-being of the children, families and individuals who live there. Place-based strategies include any effort to enhance the livability and quality of life in a given community. Implementation of the City's Strategic Plan over the past two decades demonstrates a place-based approach, which is also implemented via the City's budgeting and CIP processes. The City also recently established a Social Services Commission that addresses issues concerning the City's veterans, homeless population, adults with developmental disabilities and children with special needs and advises the City Council.z. The AFFH analysis has been updated to include historic redlining maps, as well as transit, homelessness, and housing loan information, and additional regional information about racial/ethnic minority population, income, disability, and familial
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CHAPTER 6: Housing Element

		<p>status. Contributing factors have been prioritized based on the re-evaluations noted.</p> <p>aa. The Housing Element includes strategies and programs to promote new housing near and along key commercial and transportation corridors. This strategy supports AFFH opportunities because it supports use of transit, bicycling, and walking as alternatives to the use of a personal automobile. Goods and services that residents rely upon are within proximity to housing, which is beneficial to a broad spectrum of residents who depend on or choose alternative modes of transportation. It also provides greater opportunities to distribute housing for all income levels throughout the city. It has economic benefits as well, as additional residents in proximity to businesses provides an enhanced customer base.</p> <p>bb. The City's Housing Element includes programs and objectives to fund affordable housing to the extent feasible. The City will continue to pursue grants (such as utilizing federally assisted funding the City used for the Cabrillo Family Apartments development in 2015, which provided 43 affordable units) and will apply for eligible programs. The City also will use other mechanisms that can result in reduced development costs, such as using incentives, development agreements, process streamlining, etc. The City notes that funding for affordable housing has been significantly impacted due to the state's dissolution of Redevelopment. The City's Redevelopment Agency funded many affordable housing units in Torrance in the past, from very low to moderate units. Without a replacement for funding under Redevelopment, funding for affordable housing will remain an ongoing constraint for cities and counties in California. See also Policy H.3—"Offer financial and/or regulatory incentives, where feasible, to offset or reduce the costs of developing quality housing affordable to a wide range of Torrance households." The City has a density bonus program in accordance with the state Housing Density Bonus law.</p>
6. Forecasts of ADU Development	a. The housing element did not use an HCD-recommended safe harbor methodology for forecasting future ADU production. b. The housing element should provide for mid-cycle adjustments if	

CHAPTER 6: Housing Element

	<p>inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be large enough to make up for an ADU shortfall.</p> <p>c. The housing element should assess the affordability of forecasted ADUs using city-specific data; it instead uses a regional average.</p>	<p>cc. The City has utilized a variety of methods for public outreach, which are summarized in Section 1 of the Housing Element, while Appendix A includes documentation of the various efforts. In addition, the City's process for updating its Strategic Plan informed preparation of the Housing Element. The process included considerable public outreach, including two statistically valid surveys (one for residents and one for the business community). For the Residents Survey, 1,336 Torrance residents over the age of 18 were surveyed. The survey was conducted online and by telephone. To ensure the representation of all adult residents, a random sample of those without publicly available email addresses or telephone numbers received a postcard in the mail with an invitation to take the survey online. Results were weighted slightly using figures from the U.S. Census to ensure the sample proportions reflect demographic and geographic proportions within the actual population as a whole. Several of the questions were open-ended. When asked what is the biggest issue of concern facing the residents, 11 percent stated housing costs/affordable housing, and three percent responded "homelessness." The survey tested eight issues facing the City, and 75 percent cited the number of homeless residents as extremely important/very important, and 59 percent cited affordable housing as extremely important/very important. Residents want to see Torrance as a City that provides a wide-range of affordable housing options, with 73 percent ranking this as very/somewhat important.</p> <p>dd. Forecasts of ADU Development:</p> <p>ee. The City calculated the average number of ADU permits issued for 2018, 2019, & 2020 to estimate the production of ADUs during the 6th Cycle. The average is 68.7, but the City used 60 ADUs per year as the estimate, which the City believes is a conservative estimate. Note that this is a reduction from the 100 ADU/year assumed in the 1st submittal to HCD.</p>
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CHAPTER 6: Housing Element

		<p>ff. Per Program 3, to facilitate the construction goal of a minimum of 60 ADUs/JADUs per year, within 6 months of adoption of the Housing Element the City will develop a monitoring program to ensure the City is on track to meeting identified construction goal. If by April 2025 the City is not meeting its ADU goal, the City will review and revise polices and efforts to increase ADU construction as necessary. (This was already in the 1st submittal of the draft Housing Element.)</p> <p>gg. The City used the methodology for ADUs as provided by SCAG and approved by HCD for calculating affordability estimates.</p> <p>hh.</p> <p>ii.</p>
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CHAPTER 6: Housing Element

<p>11.5.21 Letter from Californians for Homeownership, sent by email from Matthew Gelfand</p>	<p>Expressed concern that the sites inventory is legally inadequate, and that the City will not be able to meet its obligation to support the inventory with evidentiary findings as the law requires.</p> <p>Stated these inadequacies may expose the City to the risk of litigation.</p> <p>Stated their letter is intended to assist the City in identifying additional information and facts prior to adopting its Housing Element, so the City can reduce this risk and comply with the law.</p> <p>Discussed state law governing the use of nonvacant sites to satisfy housing element obligations.</p> <p>Outlined where they feel are inadequacies in the City's Draft Housing Element:</p> <ul style="list-style-type: none"> • Stated the sites inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period. • Inventory appears to assume that every listed nonvacant site will be redeveloped during the planning period. Information about the existing uses only identifies a broad category such as residential, commercial or industrial. • City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA but does not identify evidence that the existing uses on each site will be discontinued during the planning period. • Draft housing element provides a general overview of various possible housing corridors and makes broad statements about sites in these areas. Evidence is not provided that these sites have the potential to recycle, making those sites inappropriate for inclusion. • The letter requests additional information and provides a table listing the nonvacant sites identified for lower income housing in the City's sites inventory. The letter goes on to request that the City complete the table and return it to the sender within 14 days. The information requested included identifying the percentage of similar sites that were redeveloped in the Fifth Cycle or otherwise explain how its prior experience justifies its assumptions. The table also included a space to identify the site-specific evidence for particular sites. • The letter states that if the City does not respond to the letter, the assumption will be that the City has no further analysis or evidence to 	<p>Following are responses to comments in the letter:</p> <ul style="list-style-type: none"> • The Sites Inventory is supported (in the revised document) by a review of 15 recently entitled or constructed residential developments as well as by input from local developers and property owners, that continued development of housing on existing non-residentially zoned property is both a substantiated trend and has significant interest from both developers and property owners. Programs to reduce impediments and incentivize development of housing will significantly increase opportunities for additional housing by allowing residential development by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints. For example, densities will be increased; rezonings will occur to allow by-right construction on properties that are currently not zoned for residential development; and an overlay will be created and applied to certain sites to allow by-right stand-alone residential development in addition to mixed use projects. Another program will add an overlay to religious institutions that would allow for lower-income housing to be constructed by-right on properties owned and operated by religious institutions. Since many religious institutions are located in and near established neighborhoods, this strategy also promotes affordable housing in high-opportunity neighborhoods. • The City has provided a Sites Inventory that demonstrates there are adequate sites in the City to accommodate its RHNA. The City's Sites Inventory provides a total buffer of 31%, and development of a procedure to monitor the development of vacant and non-vacant sites in the Sites Inventory will ensure that adequate sites are available to meet the remaining RHNA by income category to implement "no net loss" requirements pursuant to SB 166. The City will monitor and report on the "no net loss" requirement on an <i>annual</i> basis, not just mid-cycle, so that timely adjustments can be made if necessary. • The City is mostly built out and must rely on non-vacant sites. Based on analysis, including age of buildings, land-
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CHAPTER 6: Housing Element

	<p>provide.</p>	<p>to-improvement value, sites utilization, use, interest expressed by property owners and developers, and development trends, it is reasonable to assume that the identified sites provide adequate opportunities to meet the City's RHNA. As noted above, the City's Sites Inventory provides a total buffer of 31%, and development of a procedure to monitor the development of vacant and non-vacant sites in the Sites Inventory will ensure that adequate sites are available to meet the remaining RHNA by income category to implement "no net loss" requirements pursuant to SB 166. The City will monitor and report on the "no net loss" requirement on an <i>annual</i> basis, not just mid-cycle, so that timely adjustments can be made if necessary.</p> <ul style="list-style-type: none">• Additional information has been provided regarding the various corridors. An analysis of recent trends (including examples of new housing being approved and constructed on non-residential property supports the City's strategy of promoting infill residential and mixed-use development on the various corridors. Further, implementation of the City's Housing Corridor Study (discussed in detail in the Housing Element) as well as implementation of the proposed Housing/Mixed-Use Overlay, will incentive production of housing on property that currently does not have a residential land use designation or zoning.• The City has significantly expanded Section 4 and the Sites Inventory Table (Appendix C) to provide additional information and analysis regarding the sites. See also other responses above.
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CHAPTER 6: Housing Element

<p>1.4.22 Letter from Abundant Housing LA to Gustavo Velasquez, Director, California Department of Housing and Community Development Commenter attached analysis results provided by MapCraft Inc.</p>	<p>Letter states that Abundant Housing is writing to HCD on behalf of Torrance's housing element, and concerns about what Abundant Housing sees as major deficiencies in the City's housing element update.</p> <p>Expresses concern that City hasn't identified enough parcels in its site inventory and proposed rezoning program to achieve its RHNA target of 4,939 homes by 2029.</p> <p>Expresses concern that the City has not provided the substantial evidence that the current use of the nonvacant sites allocated to meet their lower-income RHNA target is likely to be discontinued during the planning period.</p> <p>States that Abundant Housing LA has partnered with MapCraft Labs to forecast the true realistic capacity of the City's site inventory and proposed rezoning program.</p> <p>States that the findings of the MapCraft analysis include the following:</p> <ul style="list-style-type: none"> • While the City's site inventory and rezoning program claimed capacity for about 6,600 housing units, commenter's analysis suggests the expected housing capacity could fall short by 1,800 to 3,600 units. • On 374 sites where the City has claimed 6,018 housing units, commenter's analysis found that these sites are unlikely to be redeveloped to the density that the City is claiming, or are unlikely to be redeveloped altogether. Commenter states that this represents 95% of the housing units in the City's site inventory. <p>Commenter provides the following recommendations:</p> <ul style="list-style-type: none"> • Recommend that HCD urge the City to reassess its site capacity claims, and revise the sites inventory and proposed rezoning program, • Recommend the City add more parcels to the site inventory and expand its proposed rezoning program, particularly for low-density parcels in high-demand neighborhoods like Old Town Torrance and Walteria. • Recommend the City consider eliminating or reducing on-site parking requirements, which commenter suggests would greatly improve the economic feasibility of denser housing development. <p>Additional recommendations from the MapCraft executive summary include the following:</p>	<p>Following are responses to comments in the letter:</p> <ul style="list-style-type: none"> • The Sites Inventory is supported (in the revised document) by a review of 15 recently entitled or constructed residential developments as well as by input from local developers and property owners, that continued development of housing on existing non-residentially zoned property is both a substantiated trend and has significant interest from both developers and property owners. There are many programs in the Housing Element that will significantly incentivize opportunities for additional housing. For example, residential development will be allowed by-right in areas that currently are not designated or zoned to allow it and reduce identified constraints. Densities will be increased; rezonings will occur to allow by-right construction on properties that are currently not zoned for residential development; and an overlay will be created and applied to certain sites to allow by-right stand-alone residential development in addition to mixed use projects. Another program will add an overlay to religious institutions that would allow for lower-income housing to be constructed by-right on properties owned and operated by religious institutions. • Based on analysis, including age of buildings, land-to-improvement value, sites utilization, use, interest expressed by property owners and developers, and development trends, it is reasonable to assume that the identified sites are candidates for recycling and provide adequate opportunities to meet the City's RHNA. As noted above, the City's Sites Inventory provides a total buffer of 31%, and development of a procedure to monitor the development of vacant and non-vacant sites in the Sites Inventory will ensure that adequate sites are available to meet the remaining RHNA by income category to implement "no net loss" requirements pursuant to SB 166. The City will monitor and report on the "no net loss" requirement on an annual basis, not just mid-cycle, so that timely adjustments can be made if necessary. The City notes that its evaluation is based on local knowledge, local
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CHAPTER 6: Housing Element

	<ul style="list-style-type: none">• Recommend introducing new economic incentives to increase the financial feasibility of redevelopment, especially for projects that include below-market-rate units.• Consider establishing development minimums to ensure high utilization of sites with feasible housing capacity.	<p>trends, and local developer and property owner interest.</p> <ul style="list-style-type: none">• The City modified its Sites Inventory after the 1st submittal to eliminate sites that, after further analysis, did not meet its criteria. New sites were added that did meet its criteria and included property owner and/or developer interest. Regarding Old Town Torrance, the draft Housing Element has been revised to directly address and implement the recently approved Downtown Revitalization and Connectivity Plan, which includes many strategies to incentivize housing in and around Downtown Torrance. This is also a location where the City owns several parcels that it may consider for housing (as it has in the past). The Housing Corridor Study also includes rezoning of an area in Old Town to incentivize housing. New mixed-use development is already a trend in the Walteria District of the Hawthorne Boulevard Corridor Specific Plan (HBCSP). While other rezoning outside the Walteria District is not currently proposed, there is a possibility that it could be considered in the future.• The Housing Element already includes a program to evaluate and consider reducing certain development standards that may be constraints to residential and mixed-use development, including parking. Other standards that have been expressed by developers as constraints to development also will be considered, including open space requirements, height, FAR, and setbacks, especially identified as a constraints in the HBCSP.• The Housing Element includes a program to investigate the development of an “inclusionary housing” ordinance that could serve to further the City’s intentions to build more affordable housing throughout the City at locations in addition to the recommended housing sites in the draft housing element. The City’s development of an “inclusionary housing” ordinance is outlined in Program 3 of the draft housing element.• The Housing Element already includes an action in Program 1 to adopt an ordinance to revise the minimum
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CHAPTER 6: Housing Element

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		<p>densities for several existing zones, including all the residential zones, so that the minimum densities are consistent with the “expected” density ranges in the Land Use Element. These are referred to in the Housing Element capacity assessment as “target” densities. Additionally, incentives will be developed to incentivize development at or above the target densities, and disincentives for projects that propose lower than target densities will be developed.</p>
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CHAPTER 6: Housing Element

<p>2.28.22 Letter from YIMBY Law Sonja Trauss, Executive Director</p>	<p>Commenter states that findings repeatedly seen are that housing prices are high, segregation exists, and there is a lack of housing for special populations, but the policies and programs of the housing element do not respond to these findings or try to change outcomes.</p> <p>The following is a summary list of YIMBY's policy recommendations:</p> <ul style="list-style-type: none"> a. Prioritize rezoning in high resource, historically exclusionary neighborhoods b. Establish a strong tenant protection ordinance so that new housing benefits everyone c. Support homeownership opportunities for historically excluded groups d. Adequately plan for density e. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30% f. Use data from the 5th Cycle to calculate the likelihood of development for the 6th Cycle site inventory g. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element h. Incentivize new ADUs, including those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers. i. Allow residential to be built in areas that are zoned for commercial use. j. All flexibility in inclusionary zoning. k. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing. l. Reduce parking standards and eliminate parking minimums. m. Cap fees on all new housing. n. Provide local funding, to possibly include transfer tax, vacancy tax, commercial linkage fee. 	<p>Following are responses to comments in the letter:</p> <ul style="list-style-type: none"> a. The Sites Inventory as proposed will meaningfully increase the concentration of lower income households within the City, including areas where the existing concentration of lower-income households is low throughout the City. Because the City's residentially designated areas are built out, sites large enough to provide for lower-income housing are challenging to identify. Several include rezoning non-residentially zoned properties to allow residential development via an overlay (see the Housing Corridor Study described in the Housing Element, adding an overlay to allow affordable housing by-right on property owned and operated by religious institutions, which often are in or near neighborhoods of predominantly SFR properties, and facilitating ADUs. The City has adopted an ordinance consistent with SB 9, which also may result in additional affordable units. b. The City currently actively enforces fair housing laws and promotes and supports renters' (tenants') rights. For example, following the passage of AB 1482 (Tenant Protections Act of 2019), the Torrance City Council acted swiftly to stem a surge of arbitrary, no-fault evictions as a number of landlords threatened to or actually served tenants with eviction notices in advance of the implementation of the new law Ordinance 3854 that was approved by the City Council on October 29, 2019. Torrance is part of the CDBG Urban County program, which contracts with the Housing Rights Center (HRC) for fair housing services. The HRC The Housing Rights Center investigates and resolves discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. They also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and
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CHAPTER 6: Housing Element

		<p>other consumer protection regulations, as well as mediating disputes between tenants and landlords. Additional measures per the commenter are under further consideration by the City.</p> <ul style="list-style-type: none">c. The Housing Element includes policies and programs to support and encourage homeownership, and the City has a history of promoting ownership via its former Redevelopment Agency via facilitation of condominium development in Downtown Torrance for moderate-income households. The City encourages state and federal programs to increase funding opportunities for homeownership for lower-income households, such as increasing state and federal HUD programs. The City may consider local programs if funding opportunities are available.d. See response to (a) above.e. The Sites Inventory and programs provide sufficient zoned capacity to accommodate all income levels--see response to (a) above. The City will develop a procedure to monitor the development of vacant and non-vacant sites in the Sites Inventory and ensure that adequate sites are available to meet the remaining RHNA by income category to implement "no net loss" requirements pursuant to SB 166. The City will monitor and report on the "no net loss" requirement on an annual basis.f. The updated Housing Element includes an evaluation of previously entitled and constructed housing developments (residential and mixed use) including many from the 5th Cycle, as one of the methods used to inform the Sites Inventory.g. To facilitate the construction goal of a minimum of 60 ADUs/JADUs per year, the Housing Element already includes a program to develop a monitoring program to ensure the City is on track to meeting identified construction goal. If by April 2025 the City is not meeting its ADU goal, the City will review and revise policies and efforts to increase ADU construction as necessary.h. The Housing Element already has a program to
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CHAPTER 6: Housing Element

		<p>incentivize ADUs. While it does not specifically address those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers, it is something the City can consider when preparing the program.</p> <ul style="list-style-type: none">i. The Housing Element already includes several programs to allow construction of housing and mixed-use development on property that not currently designated for residential uses. Several include rezoning non-residentially zoned properties to allow residential development via an overlay (see the Housing Corridor Study described in the Housing Element, as well as adding a Housing/Mixed Use Overlay to properties along and near other key commercial corridors.j. The Housing Element includes a program to investigate the development of an “inclusionary housing” ordinance that could serve to further the City’s intentions to build more affordable housing throughout the City at locations in addition to the recommended housing sites in the draft housing element. The City will look at various options in its evaluation, including methods to promote flexibility. The City’s development of an “inclusionary housing” ordinance is outlined in Program 3 of the draft housing elementk. The Housing Element already includes several programs that will allow housing and mixed-use development to be allowed ministerially. The potential to waive fees is also one of the strategies the Housing Element includes.l. The Housing Element already includes a program to evaluate and consider reducing certain development standards that may be constraints to residential and mixed-use development, including parking. Other standards that have been expressed by developers as constraints to development also will be considered, including open space requirements, height, FAR, and setbacks, especially identified as a constraints in the
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CHAPTER 6: Housing Element

		<p>HBCSP.</p> <p>m. Capping fees on all new housing is not currently a program in the Housing Element.</p> <p>n. The City's Housing Element includes programs and objectives to fund affordable housing to the extent feasible. The City will continue to pursue grants (such as utilizing federally assisted funding the City used for the Cabrillo Family Apartments development in 2015, which provided 43 affordable units) and will apply for eligible programs. The City also will use other mechanisms that can result in reduced development costs, such as using incentives, development agreements, process streamlining, etc. The City notes that funding for affordable housing has been significantly impacted due to the state's dissolution of Redevelopment. The City's Redevelopment Appendix G (Response to Public Comments) pg. 26 Agency funded many affordable housing units in Torrance in the past, from very low to moderate units. Without a replacement for funding under Redevelopment, funding for affordable housing will remain an ongoing constraint for cities and counties in California. The Housing Element currently does not propose programs proposed by the commentor (transfer tax, vacancy tax, commercial linkage fee), although it's possible such programs could be considered during the City's continued analysis of opportunities for funding for housing.</p>
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CHAPTER 6: Housing Element

3.4.22 Letter from Californians for Homeownership, Matthew Gelfand	<p>Commenter states that City has not adopted a sixth cycle housing element, missing two compliance dates of October 15, 2021, and February 12, 2022, and they are currently preparing for litigation against cities like Torrance that have not timely adopted housing elements.</p> <p>Commenter states that they could immediately sue the City and the City could face severe penalties. The letter continues with a list of potential penalties.</p> <p>Commenter enclosed an Acknowledgement of the above-referenced statements, and states that if the City signs and returns the Acknowledgement by March 11, 2022, commenter will not initiate litigation at this time. Commenter states that if no Acknowledgement is received, they may initiate litigation.</p>	Noted.
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CHAPTER 6: Housing Element

<p>3.31.22 Email exchange between Greg Sullivan, CBRE and City staff</p>	<p>Commenter offers to help advise the City regarding “market conditions” in the tailoring of any Zoning Ordinance updates where housing and/or mixed use is concerned.</p> <p>States it is important to create the right balance and flexibility to create win/win developments for the community and to help meet the RHNA goals.</p> <p>States that generally, older ULI concepts of vertically/horizontally integrated mixed use have evolved with the onslaught of internet retail, and the necessity for this change can be witnessed by the high vacancy rate of commercial in non-core/downtown areas and mixed-use communities.</p> <p>Suggests a re-visit of commercial standards along the Hawthorn Boulevard Corridor Specific Plan (HBCSP), and states that CBRE believes that 25% gross floor area requirement has prohibited significant residential development on the corridor. Not only has the market shifted from needing this much commercial, but the parking requirements directly affect capabilities to develop meaningful residential. This is especially true in those Districts that allow lesser maximum densities of 27 units/acre.</p> <p>Commenter followed up with another question looking for more details on the 25% gross floor commercial requirements and if visitor parking and community amenities would be allowed within the 100' setback from Hawthorne for the benefit of the residential component. A subsequent question was if any changes are being proposed to the HBCSP?</p>	<p>Following are responses to comments in the letter:</p> <p>The Housing Element includes a program to review and update the Hawthorne Boulevard Corridor Specific Plan to consider reducing the following constraints, at a minimum, based on specific input and feedback from developers who have and propose to construct mixed-use and residential developments in the HBCSP:</p> <ul style="list-style-type: none"> • Reduce setback requirements for the residential portions of Mixed-Use developments in the H-NT, H-PR, and H-MP Sub-Districts. • Reduce the minimum percent of commercial uses required for Mixed-Use projects. • Review the maximum FARs for all sub-districts and increase them if necessary to ensure that projects can develop to the allowable densities. • Add objective design standards—tailor them to each district and sub-district as appropriate. • Consider other standards that may be identified during the review process as constraints to development.
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CHAPTER 6: Housing Element

<p>4.23.2022 Email received from Mark Hansen, resident</p>	<p>The commenter reviewed demographic statistics from the housing element and noted that past population projections were not realized in Torrance.</p> <p>Commenter noted that if the RHNA of 4,939 units is realized, that the population of Torrance will increase by 12,841 residents.</p> <p>Commenter questioned whether the Urban Water Management Plan can accommodate the resulting increase in water demand, if the City's wastewater infrastructure can accommodate the increased population, and whether the increased demand for electricity can be accommodated without a deterioration in quality of life.</p>	<p>The City Public Works Department provided the following response:</p> <p>Water</p> <p>Background</p> <p>The Torrance Municipal Water (TMW) utility serves approximately 78% of Torrance, with the remaining portions of the City in West Torrance and the Hollywood Rivera area served by the California Water Service Company. The City of Torrance is a direct member of the Metropolitan Water District of Southern California, who wholesales imported potable supplies (drinking water) to its member agencies in Southern California, including Torrance. Currently MWD supplies, approximately 75% of TMW's potable water demands. However, the City has embarked on local water source diversification program that will increase local supplies to approximately 70% and reduce imported water to 30% or less within the next five years. This will help "drought proof" the community. The City's North Torrance Wellfield Project (NTWP) project will be operational this summer and will triple our local potable groundwater production and increase of local supplies to 45% more of our potable water requirements.</p> <p>Specifics of Water Inquiry:</p> <p>Based on State guidelines, the Draft Housing Element forecasts that 4,939 new dwelling units will need to be constructed in the City. Assuming 2.6 people per household, this would result in an additional population of 12,841 once all units are built. In 2009, a bill SBx7-7 was passed requiring retail water agencies to reduce potable water demand by 20% by 2020 (referred to as the 20 by 20 plan). TMW's 2020 target was set at 142 gallons per day per capita (GPCD), and we actually reduced this demand by 15% below the target to 121 GPCD, as documented in Torrance's 2020 Urban Water Management Plan (UWMP). Thus, the projected additional housing units would increase water use in the TMW service area over time between 1.554 million gallons per day (mgd) using the actual 121</p>
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CHAPTER 6: Housing Element

	<p>GPCD number or at 1.838 mgd using the higher 142 GPCD target number.</p> <p>Our water demand is generally expressed in acre-feet rather than gallons (1 AF equals approximately 326,000 gallons). Thus, the projected increase in annual potable water use would total between 1,740 AF (at 121 GPCD) to 2,045 AF (at 142 GPCD). In either case, TMW has more than sufficient system capacity and water resources to meet the projected additional demands, without taking into account the demand damping effects of ongoing conservation efforts. Over the last 25 years, TMW's potable water demand has decreased by over 26% from approximately 26,050 AF to 19,200 AF, due to the concerted conservation efforts of our customers. The TWD infrastructure system was sized to meet higher demands of past years, and currently has a total system delivery capacity of more than two and one-half times of our current average demand.</p> <p>Sewer System: The City of Torrance operates and maintains a sewer collection system that conveys sewage from homes and businesses in the City to the County Sanitation Districts of Los Angeles Joint Pollution Control Plant located in the City of Carson, who provides all treatment. Similar to the water system infrastructure situation, the municipal sewer collection system was sized to meet the higher demands experienced in the 1990s. Reduction in water use has resulted in a corresponding decrease in sewage flows. In 2019, a comprehensive Sewer Master Plan was completed and no major capacity deficiency issues were identified. Based on these findings, the City's sewer system has sufficient infrastructure and pipeline capacity to meet the additional sewage flows for the proposed additional housing units in the Draft Housing Element.</p>
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CHAPTER 6: Housing Element

5.18.22 Email received from Dennis Piotrowski	The commentor stated he was pleased to see that the Housing Element included a goal to preserve the city's single-family neighborhoods and to retain the character of Torrance as desired by residents. Also concerned about negative impacts from state housing legislation that would negatively impact neighborhoods and homes.	Noted.
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CHAPTER 6: Housing Element

4.28.22 Andrew K. Fogg	Commentor writing on behalf of a client stating that the property owner does not want his property included in the Sites Inventory and has no intent of developing it with residential or mixed use development.	City removed property from Sites Inventory.
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CHAPTER 6: Housing Element

5.17.22 Manuela Tobia (CAL MATTERS)	Commentor is a reporter surveying cities about their Housing Element practices.	Noted.
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CHAPTER 6: Housing Element

5.18.22 Mark Hansen	Commentor followed up regarding questions from an earlier email submitted. Concerned about the state mandating housing based on estimated growth that did not occur. Also concerned about changing the original feel of Torrance by overbuilding.	Previous email was responded to in 2 nd submittal—staff directed commentor to where he could view the response.
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CHAPTER 6: Housing Element

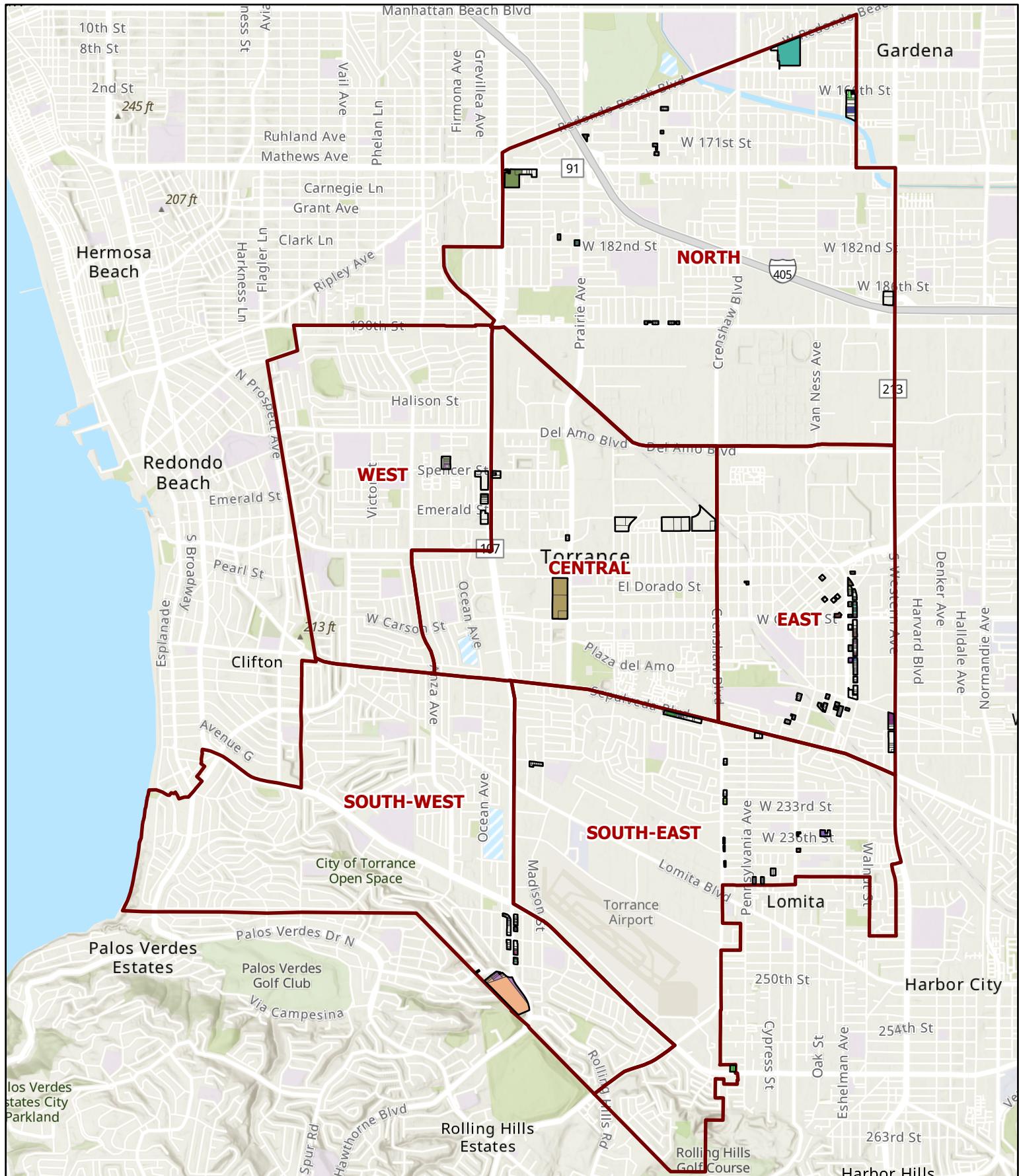
6.8.22 Doug Maupin	<p>Commentor is a developer who has developed over 800 residential units in Torrance. Provided comments on constraints to development, including FAR, parking ratios and guest parking, and open space and how its calculated. Encouraged the City to increase FAR, reduce parking, reduce open space requirements, and increase height limits. Also encouraged City to allow the Senior Development Standards to be used for non-senior housing.</p>	<p>Noted. The Housing Plan includes programs to increase FAR, reduce parking, reduce open space requirements, and increase allowable building height. Revisions to development standards have not occurred yet, and the commentors can participate in the update process to express their support for higher FARs and densities.</p>
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CHAPTER 6: Housing Element

6.14.22 John Rohan and Keith Hagaman	Commentors appreciate the proposed increase in FAR and hope that ultimate updated Zoning Code will increase the FAR to a greater FAR to allow them to construct the same density as they have constructed on other property in another city.	Rewrites to development standards have not occurred yet, and the commentors can participate in the update process to express their support for higher FARs and densities.
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APPENDIX H:

CONTIGUOUS SITES WITH POTENTIAL FOR LOT CONSOLIDATION

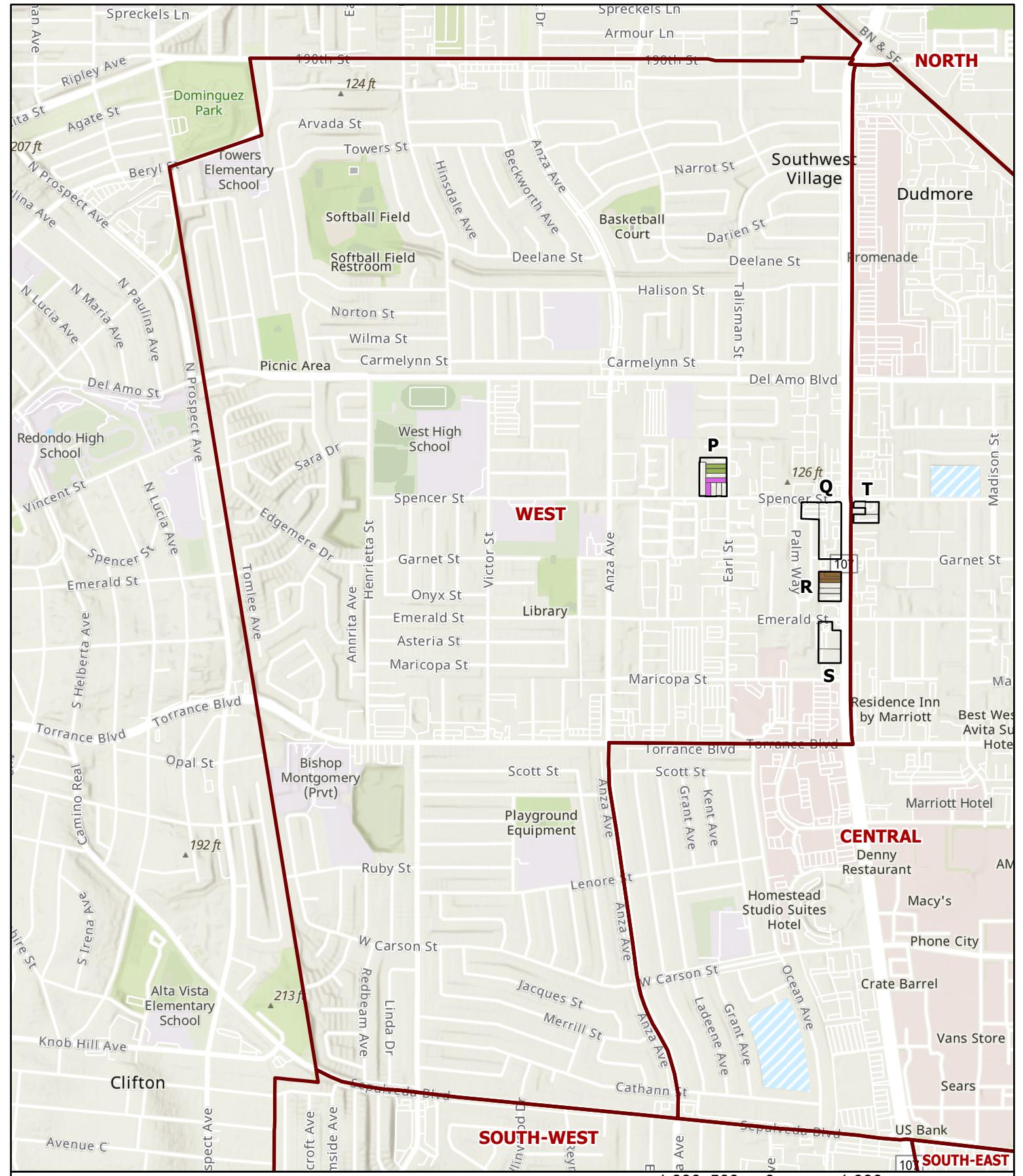


City of Torrance Housing Element Update Contiguous Sites & Same Owner Grouping



Contiguous Site Group

If Colored then Same Owner

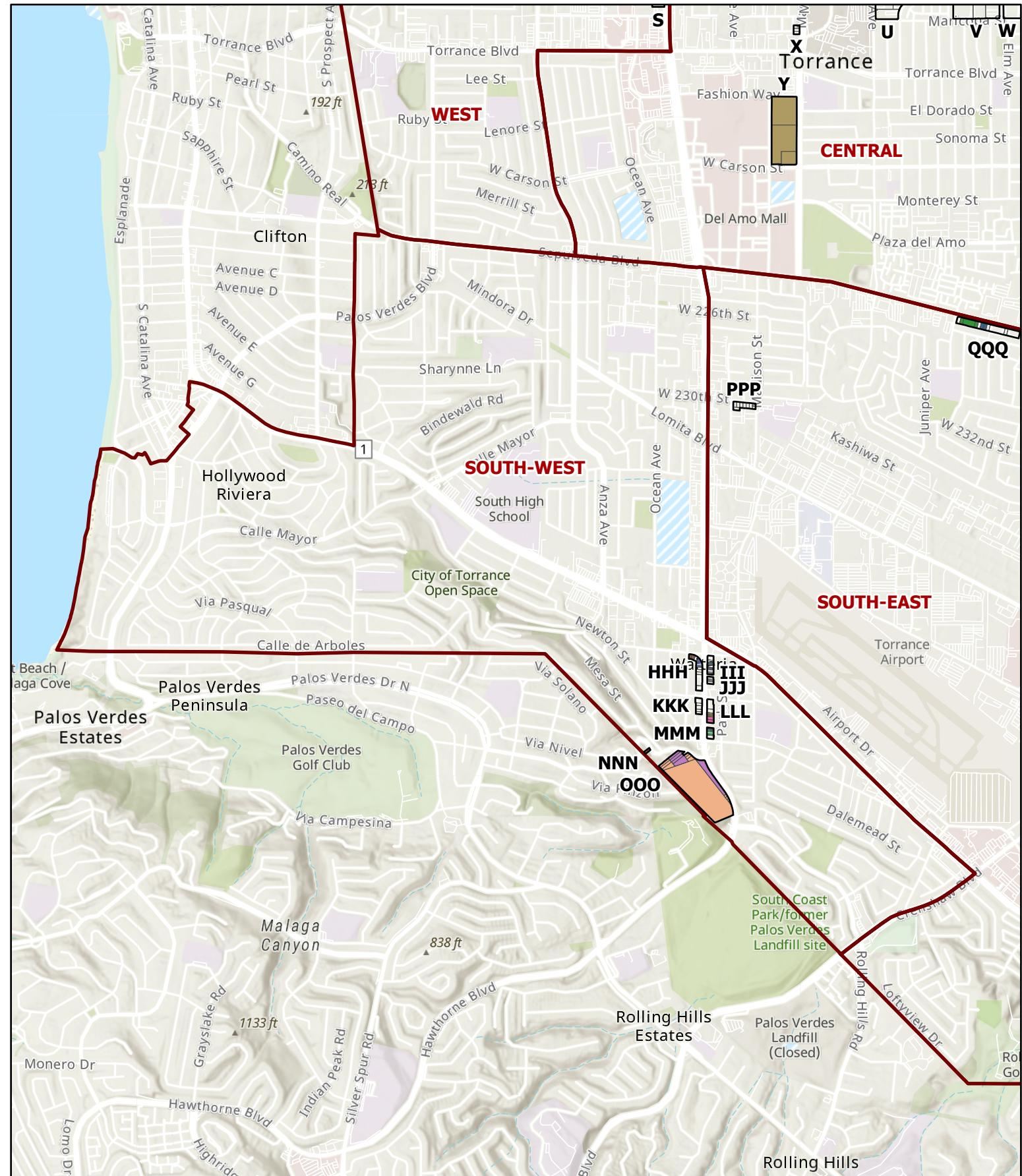


City of Torrance Housing Element Update Contiguous Sites & Same Owner Grouping Grid: West

- Contiguous Site Group
- If Colored then Same Owner

1,000 500 0 1,000
US Feet





**City of Torrance Housing Element Update
Contiguous Sites & Same Owner Grouping
Grid: South West**

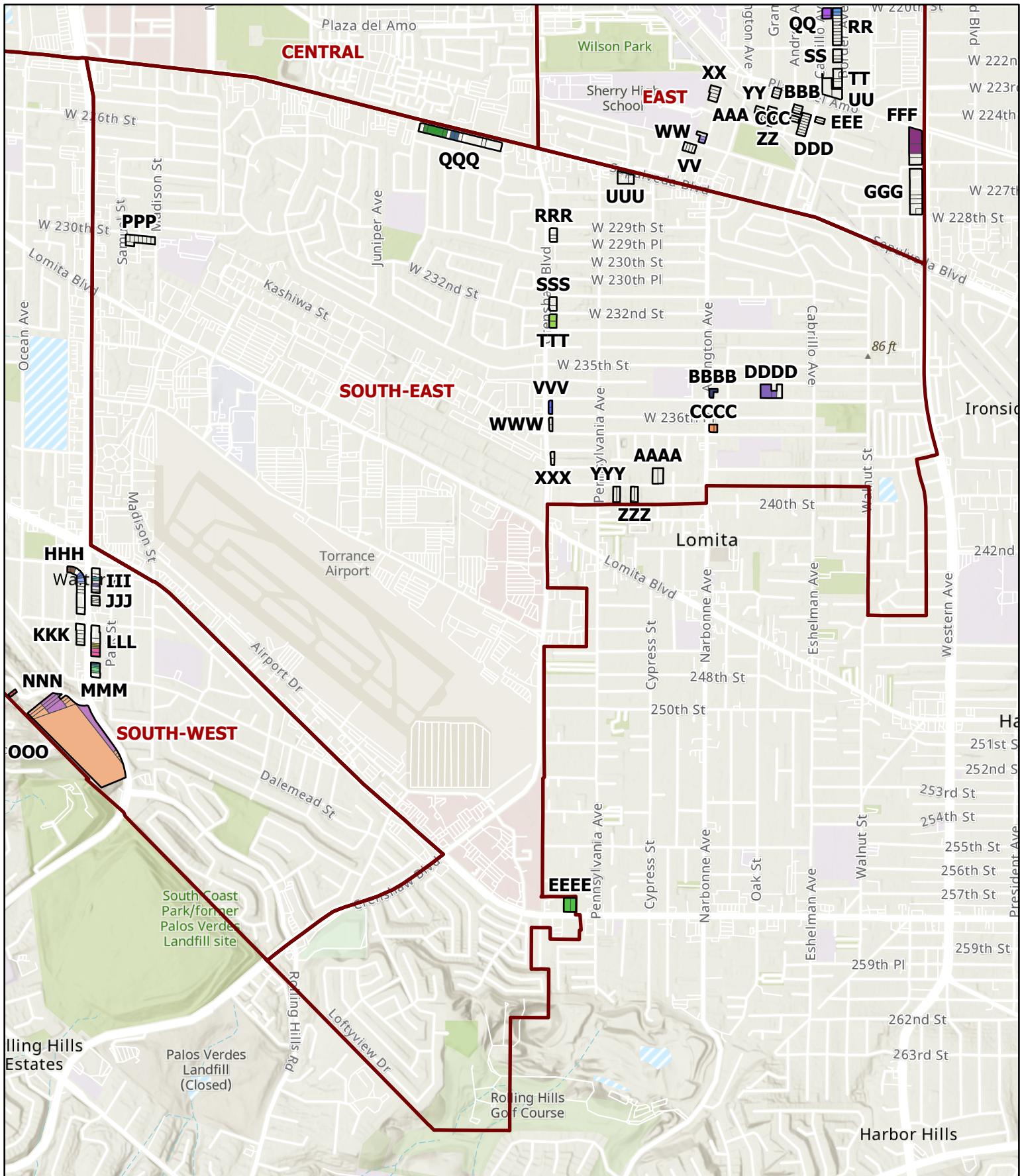
Contiguous Site Group

If Colored then Same Owner

2,500 1,250 0 2,500

US Feet



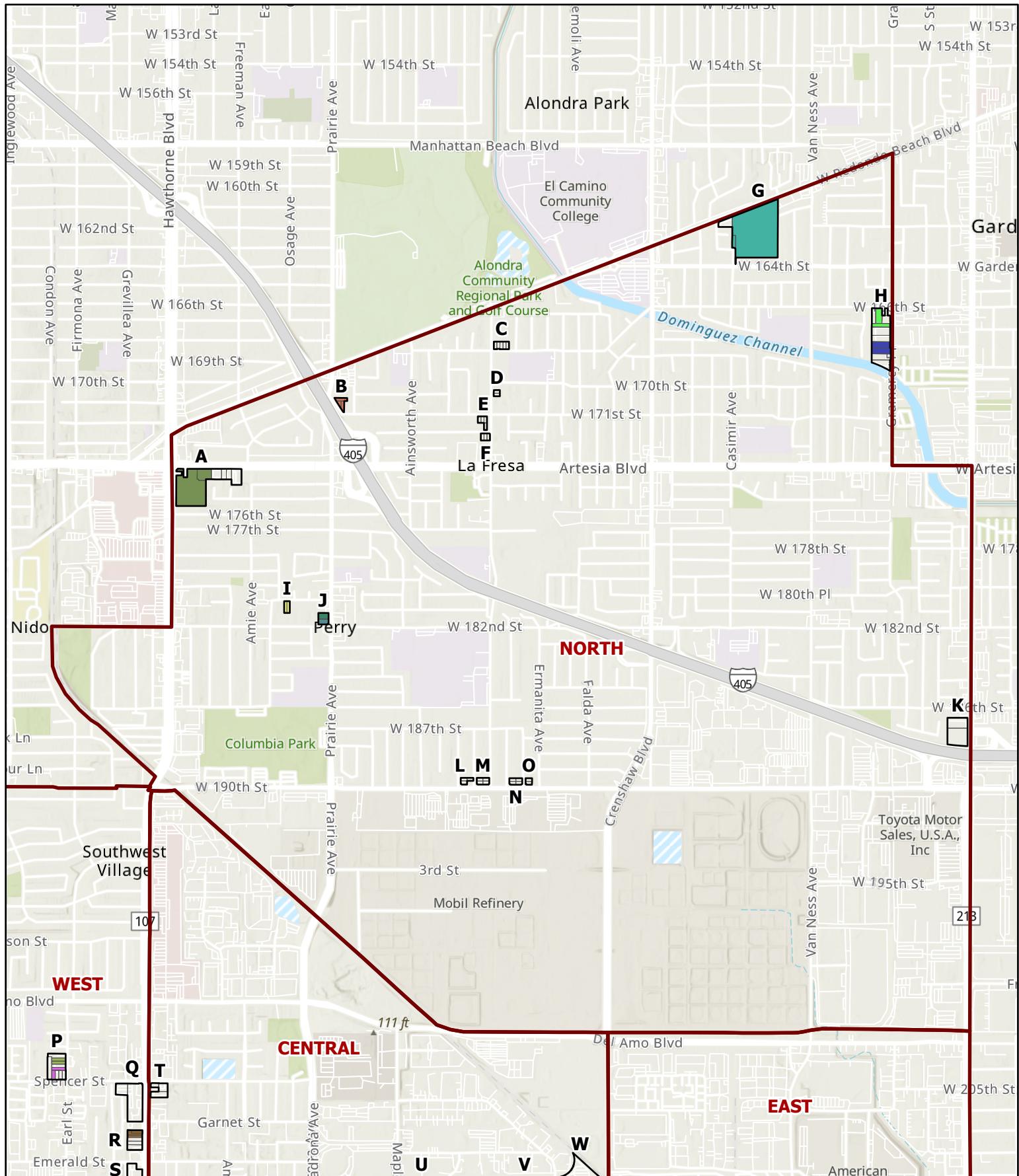


**City of Torrance Housing Element Update
Contiguous Sites & Same Owner Grouping
Grid: South East**

Contiguous Site Group

If Colored then Same Owner

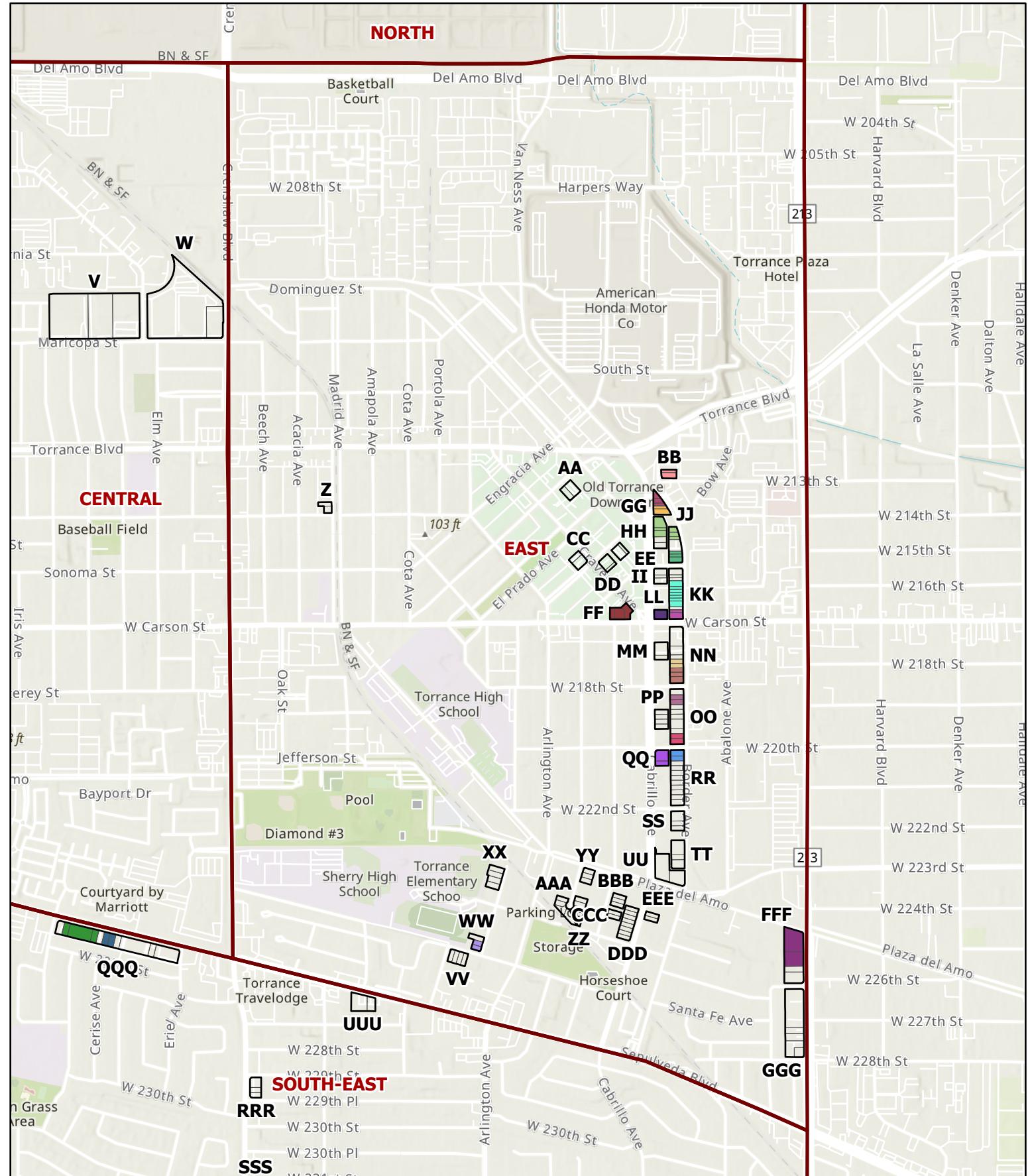




City of Torrance Housing Element Update Contiguous Sites & Same Owner Grouping Grid: North

Contiguous Site Group

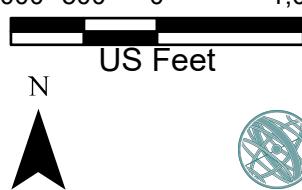
If Colored then Same Owner

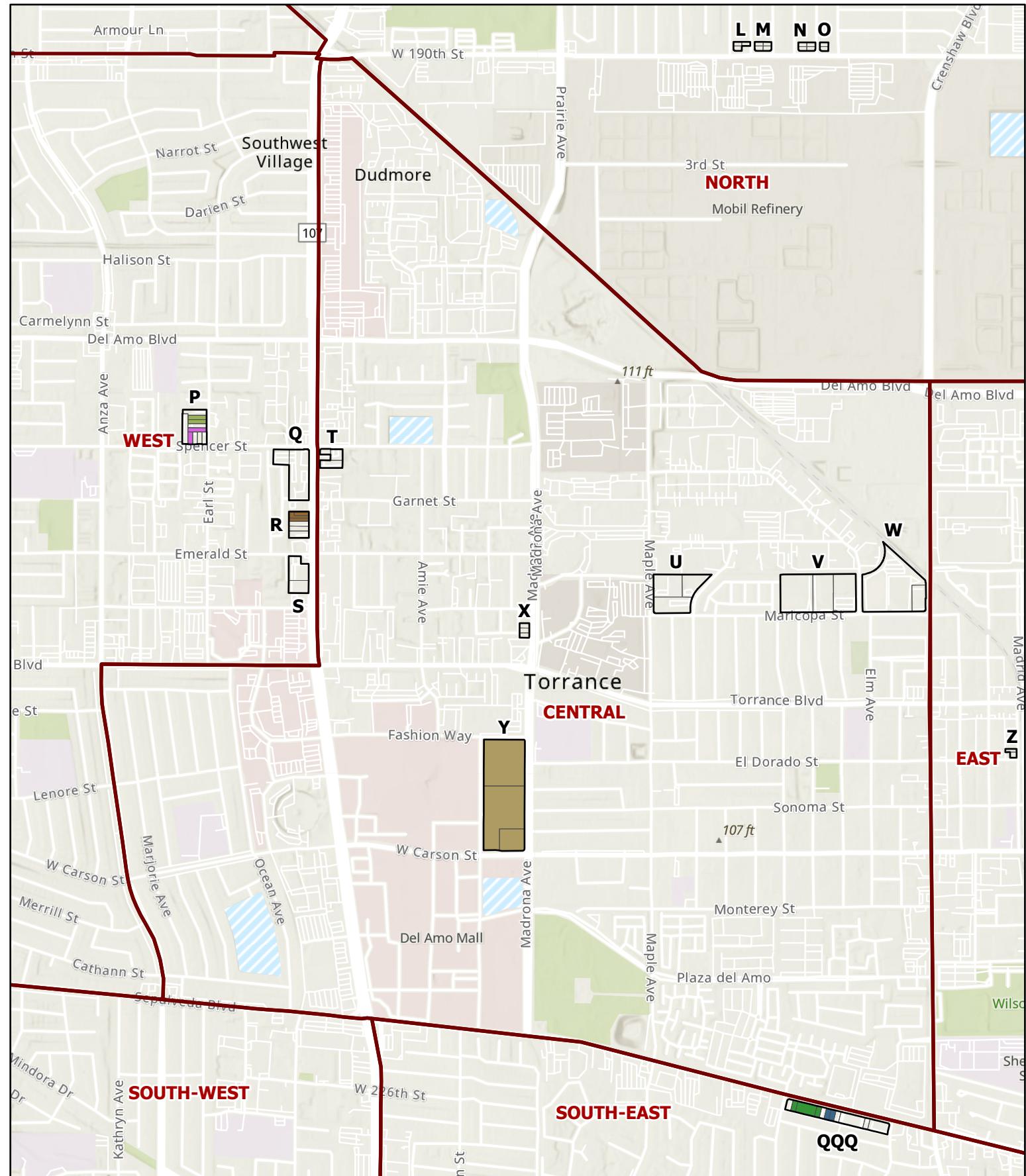


City of Torrance Housing Element Update Contiguous Sites & Same Owner Grouping Grid: East

Contiguous Site Group

If Colored then Same Owner





City of Torrance Housing Element Update Contiguous Sites & Same Owner Grouping Grid: Central

- Contiguous Site Group
- If Colored then Same Owner

