

AGENDA ITEM 8A

TO: Member of the Planning Commission
FROM: Comprehensive Planning Division
DATE: May 18, 2022
SUBJECT: EAS21-00003/LUS21-00002 Housing Element Update

The Housing Element is comprehensive plan for promoting safe, decent and affordable housing within the community. It is one of seven state mandated element of the General Plan. The state of California requires the Housing Element to be periodically updated in conjunction with Regional Housing Need Assessment (RHNA) cycle in order to plan for future population growth and housing needs and to address changes in housing laws.

The key components of the Housing Element Update include a Housing Plan which outlines goals, objectives, policies and programs for providing and preserving housing; a sites inventory and strategies to demonstrate that there are adequate sites within the city to accommodate the RHNA allocation; an evaluation of constraints to the production and preservation of housing; significant changes in housing law since the last Housing Element update; an assessment of affirmatively further fair housing (AFFH); and a summary of the City's community outreach efforts. The sites inventory must identify vacant and underutilized properties that already permit residential uses or that will need to be redesignated and rezoned, if necessary, to allow residential uses. For lower income housing, sites must allow a density of at least 30 dwelling units per acre and be between a half acre to 10 acres in size to be deemed adequate.

Due to the limited availability of vacant and underutilized land in the City, the Housing Plan proposes several programs to accommodate the RHNA:

- Start with leftover vacant/underutilized sites from the 5th Cycle Housing Element
- Identify entitled project not expected to building permits until July 1, 2021
- Identify "pipeline projects" (projects in the application phase)
- Estimate potential accessory dwelling units (ADUs) development based on recent trends and incentives
- Identify additional opportunities, which may or may not require changes to the General Plan Land Use Element and/or Zoning designation/Code including the following:
 - a) Facilitate housing on religious institution properties pursuant to AB 1851;
 - b) Housing Corridor Study
 - c) Downtown Revitalization and Connectivity Plan
 - d) Develop a program to facilitate ADU construction
 - e) Facilitate stand-alone residential uses and mixed-use residential uses in designated commercial areas and key commercial corridors.

The State Department of Housing and Community Development (HCD) is responsible for certifying each jurisdiction's Housing Element to ensure it complies and is consistent with housing element law. There are penalties, both legal and financial, for non-compliance. Housing Elements that are not certified must be updated every four years versus every eight years. There are benefits to having a certified Housing Element, which include being eligible to apply for State

grants and funds for housing and transportation improvements. State law requires that the adopted Housing Element be submitted to HCD by October 15, 2021. HCD offers a 120-day grace period from the statutory due date which gives cities until February 12, 2022 to submit the adopted the Housing Element. Staff will be sending the draft Housing Element Update to HCD on October 15 for their initial review prior to Council adoption.

The City has undertaken two projects that will facilitate the implementation of the 6th Cycle Housing Element: Housing Corridor Study and the Downtown Revitalization and Connectivity Plan. The Corridor Study, which will be presented as a separate item on this agenda, identifies seven corridor areas where new housing units could be facilitated with context-appropriate standards for potential future development. The Downtown Plan, which was approved by City Council in July, found that there is a demand for housing in the study area based on the feedback received from the community. One of the goals of the Downtown Plan is to support the redevelopment of infill sites in the corridors surrounding Downtown with stand-alone and mixed-use residential that will bring new housing units to support businesses and grow the area's customer base.

The City's Draft Housing Element Update was made available for public review on October 1, 2021 and was submitted to the State Department of Housing and Community Development (HCD) on October 15, 2021. On October 20, 2021, the Planning Commission reviewed the initial Administrative Draft of the Housing Element Update for the 6th Cycle RHNA for 2021-2029. Staff met with Housing Advocates from Abundant Housing on November 15, 2021 to discuss their housing concerns and availability. On December 8, 2021, City Staff and our consultants met with the State Department of Housing and Community Development (HCD) to review and discuss the Draft. The City received a comment letter from HCD on December 14, 2021 and received correspondence from members of the public. The City revised the Draft Housing Element to address and respond to these comments. The City's RHNA did not change; however, the City provided additional information as requested by HCD, added new policies and programs to the draft Housing Element, and updated the Sites Inventory to demonstrate compliance with State Housing law. The revised draft was made available to the public on April 11, 2022. During the timeframe between April 11, 2022 and May 9, 2022, when a second revised draft was posted in the City's website, some additional changes were made to clarify information and revise the Sites Inventory to respond to public input; those changes are highlighted in green in the May 9, 2022 version. The nature of all the revisions are summarized in Attachment 6.

Initial study

The Final Initial Study/ Negative Declaration has been prepared pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). It was available for a 30--day public review period as shown above.

Comments regarding this document were to focus on the sufficiency of the document in identifying and analyzing the potential impacts on the environment that may result from the proposed project, and the ways in which any potentially significant effects are avoided or mitigated.

RECOMMENDATION

The Community Development Department recommends that the Planning Commission conduct a public hearing to receive comments from the public, provide staff their comments on the draft

Housing Element and adopt a RESOLUTION recommending that the City Council adopt the draft Housing Element Update and a Negative Declaration.

Prepared by,



Carolyn Chun
Senior Planning Associate

Respectfully Submitted,



Gregg Lodan, AICP
Planning Manager

ATTACHMENTS:

1. RESOLUTION
2. Draft Housing Element Update (Limited Distribution)
www.torranceca.gov/housingelementupdate
3. Initial Study/Negative Declaration (Limited Distribution)
4. Planning Commission Minutes of October 20, 2021
5. State Department of Housing and Community Development Letter
6. Draft Housing Element Revisions

PLANNING COMMISSION RESOLUTION NO. 22-038

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF TORRANCE, CALIFORNIA RECOMMENDING TO THE CITY COUNCIL TO APPROVE UPDATES TO THE GENERAL PLAN HOUSING ELEMENT FOR THE 2021 TO 2029 PLANNING PERIOD AND ADOPTION OF THE INITIAL STUDY AND NEGATIVE DECLARATION PREPARED IN COMPLIANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

LUS21-00002: CITY OF TORRANCE

WHEREAS, each planning agency shall prepare and legislative body of each city shall adopt a comprehensive, long-term General Plan for the physical development of the city (Government Code Section 65300); and

WHEREAS, the General Plan shall consist of a statement of policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards and plan proposals. The plan shall include the following elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety (Government Code Section 65302); and

WHEREAS, the State law requires jurisdictions to periodically update their Housing Elements to be in compliance with changes in Housing Element Law, reflect population trends, and demonstrate that the City's Regional Housing Needs Allocation (RHNA) allocated by the Southern California Association of Governments (SCAG) can be satisfied; and

WHEREAS, the City prepared a draft Housing Element Update (HEU) for the 6th Regional Housing Needs Assessment (RHNA) Cycle (2021-2029); and

WHEREAS, the State Department of Housing and Community Development (HCD) issued a letter to the City dated December 14, 2021, with results of their compliance review of the draft Housing Element Update and provided further revisions to comply with Housing Element Law; and

WHEREAS, the City has incorporated those revisions into the Housing Element Update to ensure that the Housing Element substantially complies with Housing Element Law; and

WHEREAS, the City published a joint "Notice of Availability and Notice of Intent to Adopt an Initial Study and Negative Declaration" on October 30, 2021 announcing the start of a 30-day public review and comment period on the Initial Study and Negative

Declaration (EAS21-00003) prepared for the 2021-2029 Housing Element Update from November 1, 2021 through November 30, 2021; and

WHEREAS, following the Initial Study and Negative Declaration public review period, a Final Initial Study and Negative Declaration (EAS21-00003) was prepared to address comments received by the City from HCD on the 6th Cycle HEU; and

WHEREAS, per CEQA Guidelines Section 15073.5(c), the updates to the Initial Study and Negative Declaration do not require recirculation; and

WHEREAS, the City Council duly authorizes the City Manager to make iterative changes to the 2021-2029 Housing Element Update in response to comments from HCD to support state certification of the 2021-2029 Housing Element; and

WHEREAS, on May 18, 2022, the Planning Commission conducted a public hearing to consider adoption of the 2021-2029 General Plan Housing Element Update and the Initial Study and Negative Declaration; and

WHEREAS, on May 18, 2022, the Planning Commission recommended to the City Council the adoption of the 2021-2029 General Plan Housing Element Update (LUS21-00002) and the Initial Study and Negative Declaration (EAS21-00003) by the following roll call vote:

AYES:	COMMISSIONERS:
NOES:	COMMISSIONERS:
ABSENT:	COMMISSIONERS:
ABSTAIN:	COMMISSIONERS:

WHEREAS, furthermore, the Planning Commission determines that:

- The 2021-2029 Housing Element Update facilitates land use planning and policies to accommodate City's RHNA, and comply with State Housing Element Law, which mandates that local governments plan for the housing needs of all economic segments of the community and individuals with special needs.
- The RHNA is essentially non-discretionary for the local jurisdiction. The RHNA is an eight-year planning goal, not a housing production requirement.
- The Housing Element Update does not grant any development entitlements or authorize construction development.

- No physical development, construction or other ground disturbance is proposed at this time. Therefore, no direct physical impacts to the environment would occur from HEU adoption.

NOW, THEREFORE, BE IT RESOLVED that the updates to the 2021-2029 General Plan Housing Element Update (LUS21-00002) and Initial Study and Negative Declaration (EAS21-00003) are hereby **RECOMMENDED** for adoption by the City Council,

Introduced, approved, and adopted this 18th day of May 2022.

Chairperson, Torrance Planning Commission

ATTEST:

Secretary, Torrance Planning Commission

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss
CITY OF TORRANCE)

I, OSCAR MARTINEZ, Secretary to the Planning Commission of the City of Torrance, California, do hereby certify that the foregoing resolution was duly introduced, approved, and adopted by the Planning Commission of the City of Torrance at a regular meeting of said Commission held on the 18th day of May 2022, by the following roll call vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONERS:

ABSENT: COMMISSIONERS:

ABSTAIN: COMMISSIONERS:

Secretary, Torrance Planning Commission

7A. LUS21-00002 HOUSING ELEMENT UPDATE: CITY OF TORRANCE

Planning Commission will conduct a public workshop to receive input on the Public Review Draft of the Housing Element from the Planning Commission, residents, and other stakeholders regarding the 6th Regional Housing Needs Assessment (RHNA) Cycle Housing Element Update. An Environmental Assessment will be prepared for the Housing Element Update and returned with the next Draft Housing Element for review and consideration.

Recommendation: Approval.

Planning Associate Joe introduced the request.

Planning Manager Lodan distributed copies of the presentation and opened the presentation on the Housing Element Update Workshop.

Patricia Bluman, Senior Associate at CityPlace Planning, Inc., provided a brief background and overview of the project. The topics covered included summaries of the first and second Housing Element workshops, draft housing element, accommodation of the (RHNA) Regional Housing Needs Allocation, Goals and Programs, Public Outreach, and the Next Steps.

In reference to the first workshop, Ms. Bluman presented visuals on the number of units that Los Angeles County and the City of Torrance must satisfy based off State and SCAG Region requirements. Torrance must demonstrate potential satisfaction of needs for 4,939 units out of the total 813,082 units in Los Angeles County. She noted that the 6th cycle of RHNA requirements were almost 3 ½ times the amount required than the 5th cycle, which was 1,450 units. She communicated that all cities have experienced an increase.

Commissioner Anunson inquired about the magnitude difference from the State level. Ms. Bluman responded that each city had about a 2 to 4 times increased amount than the 5th cycle.

Commissioner Choi questioned the entire process. Ms. Bluman explained that evaluations are completed by cities to develop conclusions on demographics such as income and estimated cost of living. She emphasized the focus on density and density proxy, which is 30 dwelling units. Ms. Bluman summarized that even if not actually built, the city must demonstrate the potential to provide and accommodate affordable housing on qualifying sites, which fulfill the (HCD) California's Department of Housing and Community Development requirements and the specified percentages of each income category. These potential sites were labeled by income on the Housing Element map.

Ms. Bluman explained that there are some developers who specialize in low income to obtain tax credit. She added that Torrance must make sure that no net loss requirement is maintained to ensure that certain number of sites are available for certain income brackets.

Commissioners Anunson and Choi asked about the consequences of not meeting state requirements. Ms. Bluman answered that the state could penalize the City by providing disincentives like prohibition of issuing both commercial and residential building permits. She advised on compliance as it could lead to a lawsuit against the City by the state attorney general, housing advocates, or individuals. Planning Manager Lodan emphasized that although there is no strict penalty or law, grant funding is often tied to being compliant and having a certified housing element.

In response to Commissioner Kartsonis' inquiry about religious institutions, Planning Manager Lodan addressed that these sites were market rate developments, and the item of topic is focused on affordable housing.

Chairperson Sheikh asked whether Torrance met the 5th RHNA cycle requirements. Planning Manager Lodan answered that as of 2020, the City has built 234 of the required units, but has fallen short of the goal. Commissioner Anunson reminded the Commission that the City only had to show potential to construct, which Planning Manager Lodan affirmed. Planning Manager Lodan stressed the state's aggression to meeting the requirements and suggested preparing the necessary documents to maintain local control and make decisions accordingly.

Planning Manager Lodan stated that the 4,939-unit requirements are for the next cycle and not additive to the 5th cycle, in response to Chairperson Sheikh's inquiry.

Commissioner Pino inquired about the inclusion of (ADUs) accessory dwelling units in the requirements and Planning Manager Lodan confirmed that it would be a contributing factor to meeting the requirements.

Commissioner Choi learned that ADUs alone would only cover a portion of the requirements. Planning Manager Lodan reported that the City allocated 800-units in the strategy based of the number of units tracked on applications.

Planning Manager Lodan disclosed a new law that allows religious institutions to construct affordable housing on their lot. Ms. Bluman noted that some institutions across Los Angeles and California have started to pursue this route to retain the property from the effects of COVID-19 and declining church attendance. When asked by Commissioner Choi if Torrance pursued this, Planning Manager Lodan stated that exact numbers were undetermined since it depends on multiple factors and only the potential capacity is calculated. Ms. Bluman added that conservative assumptions were made because HCD will be observing them.

In reference to the second workshop, Commissioner Pino challenged the method of providing affordable housing in expensive neighborhoods such as the Hillside Overlay District. Planning Manager Lodan suggested some strategies to create these opportunities were by building through churches, ADUs, or junior ADUs.

Commissioner Pino inquired about ADUs categorization as affordable housing, but not as property for sale. Planning Manager Lodan confirmed that ADUs are traditionally rentals and that affordable ADUs require covenants with the property owner. He predicted that junior ADUs were more affordable than larger ones due to their smaller and simplified structure. He suggested that the City could encourage these developments in the Hillside Overlay area to limit square footage.

Commissioner Pino requested clarification on the new legislation allowing homeowners to sell ADUs. Planning Manager Lodan disclosed that the City is working on an ordinance that would impact the ability to divide lots and sell off new units on traditional single-family households.

In response to Commissioner Kartsonis' inquiry, Planning Manager Lodan announced that target density would encourage higher density to help meet the RHNA numbers. He concluded that the City has prepared a 20% buffer of affordable units to accommodate underdevelopment.

Chairperson Sheikh and Planning Manager Lodan examined that the main idea was to strategize ways to meet the requirements. Planning Manager Lodan elaborated on the reason for the document. Staff identify the merits of a particular development and explain how those properties comply with the Housing Element to make an educated decision on a project, which would create opportunities to make development easier or more affordable.

Commissioner Choi wondered if any employers in Torrance provide affordable housing. Planning Manager Lodan was uncertain and reported that unanswered questions will be addressed in the future.

In response to Commissioner Choi's inquiry about the housing element approval process, Planning Manager Lodan detailed that staff will present a draft to the Commission and Environmental Study, then the recommendations of staff and the Commission will be presented to Council before the deadline.

In response to Commissioner Choi's concerns, Community Development Director Ramirez elaborated on the process that once the document is submitted to HCD, it is returned with comments to staff. Once the revisions are approved by HCD, the document is reviewed by the Commission for approval to the City Council, who does the final approval. The final document is then sent to HCD. Assistant City Attorney Strader communicated that this process is the state of the law.

Assistant City Attorney Strader disclosed that public opinion workshops and polls have been completed and taken into consideration by experts, in response to the concerns of the Commission.

Ms. Bluman summarized each section of the 6th cycle Housing Element.

Planning Manager Lodan recounted that the document was reviewed and finalized by staff in the last 2 months.

Commissioners Choi and Kartsonis inquired about the itemized list of all the properties. Commissioner Kartsonis asked if zoning changes happened once the final version of the document is approved. Planning Manager Lodan responded that an approval would not create a zoning change and that future zone changes will have to be individually processed. He indicated that the document is for the purpose of identifying sites.

In response to Chairperson Sheikh's inquiry about state and city funding on low to moderate income funds, Planning Manager Lodan explained how the programs are funded through tax increments. The City purchased properties to develop affordable housing. Planning Manager Lodan informed the Commission that these properties are individually managed, and tenants must continuously meet eligibility requirements.

Commissioner Kartsonis requested eligibility clarification of property types that count towards the RHNA. Ms. Bluman stated that housing must be permanent to qualify.

Ms. Bluman announced that state law requires an update to zoning codes to allow ordinances in accommodation of certain housing facilities such as supportive housing, transitional housing, single-room occupancies, and emergency shelters.

Community Development Director Ramirez expressed that the 20% buffer will help the City prepare for the unknown numbers of meeting the capacity. In response to Commissioner Choi, she emphasized that the City must only show potential to meet the requirements. She and Assistant City Attorney Strader concluded that the purpose was to demonstrate willingness to meet the RHNA numbers.

Ms. Bluman continued presenting the public outreach efforts. She concluded with the announcement of deadlines and next steps.

Planning Manager Lodan revealed that the CEQA document will be presented to the Commission in a future commission meeting.

Chairperson Sheikh invited public comment.

Mark Hansen, 823 Beech Ave, shared his concerns about direction coming from an outside agency and about the lack of action on helping the homeless population. He appreciated the City's efforts. Planning Manager Lodan listed some efforts that were affiliated with such concerns.

Commissioner Choi inquired about the letters of correspondence listed on the supplemental material.

Commissioner Kartsonis, Commissioner Anunson, and Chairperson Sheikh commended staff for their hard work. Commissioner Anunson and Chairperson Sheikh applauded the staff's process on developing the document.

Chairperson Sheikh wondered if staff intend to reach out to and incentivize homeowners with older properties. Planning Manager Lodan relayed programs will be put into place to prepare for a smoother development process in accordance with the City's budget.

8. **HEARINGS** – None.

9. **RESOLUTIONS** – None.

10. **COMMISSION AND STAFF ORAL COMMUNICATIONS**

Chairperson Kartsonis recounted a previous item that was reviewed and denied by the Commission but approved by the City Council. He thanked the staff for their hard work.

Assistant City Attorney Strader indicated that the Commission would not have to be informed of an item's substantial change unless it directly affected them. Planning and Environmental Manager Martinez noted that it was not a common occurrence.

Planning and Environmental Manager Martinez announced that in their next meeting, the City Council will hear an item that the Commission approved.

Planning Manager Lodan thanked the Commission for a thorough review of the materials and for asking questions. He informed that public comments should be directed to cddinfo@torranceca.gov or to visit the website at torranceca.gov/housingelementupdate.

Planning Manager Lodan and Chairperson Sheikh appreciated Patricia Bluman and Claudia Tedford from CityPlace Planning, Inc.'s efforts. Chairperson Sheikh also gave thanks to the public for attending the meeting.

11. **ADJOURNMENT**

MOTION: At 9:31 p.m., Commissioner Kartsonis moved to adjourn this meeting to November 3, 2021, at 7:00 p.m. The motion was seconded by Commissioner Pino with a unanimous roll call vote, with Commissioners Rudolph and Tsao absent.

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Approved as submitted
December 1, 2021
s/ Rebecca Poirier, City Clerk

Celeste Kim
Recording Secretary

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Planning Commission
October 20, 2021

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

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Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



December 14, 2021

Michelle Ramirez, Director
Community Development Department
City of Torrance
3031 Torrance Blvd
Torrance, CA 90503

Dear Michelle Ramirez:

RE: City of Torrance's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Torrance's draft housing element received for review on October 15, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on December 8, 2021 with you, Gregg Lodan, Planning Manager; Carolyn Chun, Senior Planning Associate; Kevin Joe, Planning Associate and your consultants Veronica Tam and Claudia Tedford. In addition, HCD considered comments from Erik Felix, California for Homeownership; Our Future LA Coalition; Abundant Housing LA; Torrance for Everyone; and YIMBY LA pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of this statutory deadline, then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke

Michelle Ramirez, Director
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its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

HCD appreciates the dedication of the housing element team during the update. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Dulce Ochoa, of our staff, at dulce.ochoa@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF TORRANCE

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The element must provide an evaluation of the cumulative effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness) and revise programs as appropriate.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Outreach: Outreach specifically related to affirmatively furthering fair housing (AFFH) is foundational to a complete analysis and formulating appropriate goals and actions to overcome patterns of segregation and foster more inclusive communities. The element should summarize outreach relative to the City's fair housing issues and formulate appropriate programmatic response.

Assessment of Fair Housing: The element provides data regarding the patterns of various socio-economic characteristics across all components of the required analysis (e.g., segregation and integration, access to opportunity, displacement). However, the element should also generally discuss and analyze patterns and trends for the various socio-economic characteristics.

Disproportionate Housing Needs Including Displacement Risk: While the element provided an analysis for cost burden and severe cost burden by tenure at the local level, the

analysis must also address homelessness for disproportionate impacts on protected characteristics and disparities in access to opportunity.

Sites Inventory: While the element maps identified sites to accommodate the regional housing needs allocation (RHNA), it generally does not address this requirement. The analysis must evaluate the location of sites by income group, the magnitude of the impact on current patterns, any isolation of the RHNA by income groups and conclude whether sites improve or exacerbate conditions. The analysis should address the income categories of identified sites for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

Local Data and Knowledge: The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates, public comments, and service providers.

Other Relevant Factors: The element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, history of lending practices and demographic trends.

Contributing Factors: Based on the outcomes of a complete analysis, the element should re-evaluate and prioritize contributing factors to fair housing issues as appropriate.

Goals and Actions: Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions. Goals and actions must specifically respond to the analysis and prioritized contributing factors to fair housing issues. Actions must have metrics and milestones as appropriate and address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

- 2. Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

Overpayment: While the element identifies over 20,000 overpaying households (p.18), it must analyze the number of overpaying households by tenure (i.e., renter and owner), including for lower-income households.

Extremely Low-Income (ELI) Households: The element must analyze the housing needs of ELI households. This is particularly important given the unique and disproportionate needs of ELI households. For example, the element should analyze tenure, cost burden and other household characteristics then examine trends and the availability of resources to determine the magnitude of gaps in housing needs.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Housing Conditions: The element identifies the age of the housing stock and provides information on code compliance cases (p. 30). However, the element should also estimate the number of units in need of rehabilitation and replacement to better formulate policies and programs.

4. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Parcel Listing: The parcel listing should describe the existing use for each parcel. The description should be sufficiently detailed to facilitate an analysis that the use will likely discontinue in the planning period. In addition, various sites identify the affordability level of the units as "mixed." The element must specify the number of units being credited toward lower, moderate, and above moderate.

Realistic Capacity: The element lists various zones by target or expected densities and then also assumes a percentage to be developed with residential uses (Table H-42). In almost all cases, the element assumes residential uses will occur 100 percent of the time, despite the zones apparently allowing 100 percent nonresidential uses. The element must include analysis to support these assumptions and adjust capacity calculations if necessary. This analysis should consider the likelihood of 100 percent nonresidential uses, performance standards for residential development and development trends supporting residential. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.

In addition, the element assumes the Religious Institutions Housing Overlay Zone (RIH-OZ) will develop 25 percent residential but provides no support for this assumption. The element should demonstrate what specific trends, factors, and other evidence led to the assumption or adjust assumptions as appropriate.

Small and Large Sites: Sites smaller than a half-acre or larger than ten acres in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period or other evidence that demonstrates the adequacy of these sites to accommodate housing for lower-income households.

Suitability of Nonvacant Sites: The element notes the City has very little vacant land and describes a multi-pronged strategy that includes nonvacant sites in housing corridors, residential infill and religious institution housing overlays. The element further explains various market factors, regulatory incentives, overarching strategies on where to promote growth and descriptions of key areas with a reasonable likelihood to develop with higher

intensity uses. In some cases, the element notes conditions that uses will likely discontinue like expressed interest from property owners. However, the element must reflect these conditions in the inventory and evaluate past experience in converting uses to higher density and other redevelopment trends and relate these experiences to factors for determining underutilization of identified sites. For example, if a site has expressed interest or vacancy or presence of other conditions indicating turnover of uses, the inventory should note these conditions. If the City has recently redeveloped sites with commercial uses on sites that are predominantly underutilized, the element should discuss this recent experience and relate the experience to similar sites. Specifically, the analysis must consider factors including the extent to which existing uses may constitute an impediment to additional residential development, past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

In addition, the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the regional housing need allocation.

Finally, if element utilizes sites with existing residential uses. Absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).

City-owned Sites: For your information, if the sites inventory identifies sites that are City-Owned the element must include an analysis to demonstrate their suitability and availability in the planning period. Specifically, the analysis should address general plan designations, zoning, allowable densities, support for residential capacity assumptions, existing uses and any known conditions that preclude development in the planning period and the potential schedule for development. If zoning does not currently allow residential uses at appropriate densities, then the element must include programs to rezone sites pursuant to Government Code section 65583.2, subdivisions (h) and (i).

Accessory Dwelling Units (ADU): ADUs may be counted toward the RHNA based on past permitted units and other factors. In the element, the City projects 800 ADUs to be constructed over the planning period, averaging 100 units per year (p. 81). This projection was based on figures provided based on 100 ADUs in 2021. However, HCD records indicate 1 ADU for 2018, 26 ADUs for 2019, and 2 ADUs for 2020. The element should reconcile these figures, consider past permitted trends, potential for future fluctuations and other relevant factors and adjust assumptions based on permitted units as appropriate.

Environmental Constraints: While the element generally describes a few environmental conditions within the City, it must relate those conditions to identified sites and describe any other known environmental or other constraints that could impact housing development on identified sites in the planning period.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions.

Zoning for a Variety of Housing Types:

- ***Emergency Shelters:*** The element mentions emergency shelters are permitted in the M-2 zone. However, the element should also clarify shelters are permitted without discretionary action and identify and evaluate development standards as potential constraints.
 - ***Employee Housing:*** The element must demonstrate zoning in compliance with the Employee Housing Act (Health and Safety Code, § 17000 et seq.). Specifically, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The element should either describe how the City's zoning explicitly complies with this provision or add or modify programs.
5. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land-Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to heights, unit sizes and garage requirements for parking. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

Processing and Permit Procedures: While the element includes information about processing times, it should also describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing and approval certainty.

Fees and Exactions: While the element lists various planning fees, it must specifically analyze the fees for a conditional use permit (Tier 2) and include programs to address identified constraints as appropriate.

SB 330 Preliminary Application: The element must clarify compliance with SB 330 (Statutes of 2019) and add or modify programs to establish compliance if necessary

Zoning, Development Standards and Fees: The element must clarify whether the community complies with new transparency requirements for posting all zoning, development standards and fees or include programs as appropriate.

6. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

Construction Costs: The element must estimate typical total construction costs, including materials and labor.

Requests for Lower Density, Permit Times, and Efforts to Address Nongovernmental Constraints: The element must analyze (1) requests to develop housing at densities below those identified in the inventory, (2) the length of time between receiving approval for a housing development and submittal of an application for building permits, and (3) any local efforts to address or mitigate nongovernmental constraints such as reduced fees, financing for affordable housing or expedited processes. The analysis should address any hinderances on the construction of a locality's share of the regional housing need and programs should be added or modified as appropriate.

7. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

The element includes data and analysis for persons with special needs. However, to better formulate policies and programs, it should also provide the total number of persons with developmental disabilities (e.g., CA Department of Developmental Services) and permanent and seasonal farmworkers at a county level (e.g., USDA Census of Agriculture).

8. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts,*

mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)

The element identified 112 units at-risk within a ten-year period, the analysis of “at-risk” units meets most analysis requirements (p. 34). However, the analysis of must include the following (Gov. Code, § 65583, subd. (a)(9).):

- Total number of elderly and non-elderly units.
- Estimated total cost for producing, replacing, and preserving the units at-risk.
- Identification of public and private non-profit corporations known to the City to have the legal and managerial capacity to acquire and manage at-risk units.
- Identification and consideration of use of federal, state, and local financing and subsidy programs.

For additional information and sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml>.

C. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B4, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- **Adequate Sites:** The element includes various actions that appear intended to address a shortfall of sites to accommodate the RHNA. For any program intended to address a shortfall of sites at appropriate densities to accommodate the RHNA for lower-income households, the program must meet all requirements pursuant to Government Code sections 65583.2, subdivisions (h) and (i). In addition, these programs should identify the shortfall, minimum acreage to be rezoned and anticipated allowable densities. Programs that may require revising include Programs 1 (Adequate Sites to Accommodate the RHNA), 7 (Religious institution Housing Overlay Zone) and 8 (Residential and Mixed-Use Corridors).

- **Lot Consolidation:** The element includes actions within Program 3 (Removal of Governmental Constraints) to promote lot consolidation. These actions should be modified to be proactive and include discrete timing. For example, the Program should commit to proactive technical assistance with developers and property owners and when and how often (e.g., every other year) the City will survey and develop new incentives. Finally, this program may require additional revision upon a complete analysis of identified smaller sites.
- **Replacement Housing Requirements:** If nonvacant sites are identified with residential uses, the housing element must include a program to provide replacement housing. (Gov. Code, § 65583.2, subd. (g)(3).) The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c)(3).

2. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

Program 9 (Affordable Housing Development): As noted in Appendix B, the City did not accomplish one unit affordable to lower-income households in the prior planning period. As a result, Program 9 should be modified, instead of continued without change, with additional actions to assist in the development of housing for lower-income households, including ELI and special needs households. For example, the Program must include a proactive component to reach out to developers, service providers or any related organizations to better seek and identify opportunities. The Program should also include clear milestones for actions. A milestone of ongoing does not appear to be successful and the City should consider more discrete timelines (e.g., annual). Please see the Building Blocks for additional information. The Program should also have clear and specific action related to the housing needs of ELI and special needs households.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B5 and B6, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify programs.

5. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, “accessory dwelling units” has the same meaning as “accessory dwelling unit” as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).)*

Program 6 (Accessory Dwelling Units) (ADU): The element indicates that within one year of adoption the City will develop a program to promote ADU development (p. 102). However, the element should consider actions beyond promoting ADUs and clarify options the City will be considering. Examples include exploring and pursuing funding, modifying development standards, and reducing fees beyond state law, pre-approved plans, and homeowner/applicant assistance tools. In addition, the Program should commit to more frequent monitoring of ADU production and affordability and timing (e.g., within 6 months) for when policies and efforts will be revised if ADUs are not permitted according to assumptions in the element.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd. (c)(8).)

HCD understands the draft element was made available for review on October 1, 2021, only 14 days before submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.

Draft Housing Element Revisions

SUMMARY of changes between the October 15, 2021 (1 st submittal) and the April 11, 2022 version of the Draft Housing Element	SUMMARY of changes between the April 11, 2022 and the May 9, 2022 (2 nd Submittal) version of the Draft Housing Element
<p>Section 1—Introduction:</p> <ul style="list-style-type: none"> • Discussion of data sources used was expanded. • Discussion of outreach methods used was expanded. Additional outreach efforts that took place following completion of the 1st submittal draft Housing Element were included. 	<p>Section 1—Introduction:</p> <ul style="list-style-type: none"> • The review period was updated.
<p>Section 2—Community Profile:</p> <ul style="list-style-type: none"> • Population and housing data and the evaluation of housing needs was expanded as requested by HCD. • Additional information regarding substandard housing and property maintenance issues were added. • Inventory of at-risk units and date of earliest conversion was clarified. 	<p>Section 2—Community Profile:</p> <ul style="list-style-type: none"> • No change.
<p>Section 3—Housing Constraints:</p> <ul style="list-style-type: none"> • City's action to implement SB 9 was added. • Constraints regarding the Hawthorne Boulevard Corridor Specific Plan (HBCSP) that was received during a new stakeholder meeting was added. • Processing and permit procedures were clarified, including for SB 330. • Transparency in the development process was added. • Reductions to constraints was added. • Discussion of construction costs was expanded. • Discussion regarding environmental constraints was added. 	<p>Section 3—Housing Constraints:</p> <ul style="list-style-type: none"> • A discussion regarding the impact the dissolution of redevelopment agencies in California has had on the reduced availability of funding for affordable housing was added, including the impact on the former Torrance Redevelopment Agency. • Other regulatory challenges that present barriers to development of affordable housing were added.
<p>Section 4—Housing Opportunities and Resources:</p> <ul style="list-style-type: none"> • The list of entitled and pipeline projects (credits toward RHNA) was updated. • The number of ADU permits issued from 2018-2020 was revised and Annual Progress Reports (APRs) from those years was submitted to HCD. The estimated number of ADUs to be constructed during the 6th Cycle (credits toward RHNA) was reduced from 600 to 480 per input from HCD • Remaining RHNA was revised based on revisions to entitled and pipeline projects and ADU estimates. • Realistic capacity assumptions for Sites Inventory was expanded. • A sampling of 15 entitled and constructed projects was prepared—a summary table, follow-up discussion of the 	<p>Section 4—Housing Opportunities and Resources:</p> <ul style="list-style-type: none"> • Numbers were revised to reflect changes to the sites inventory (See Appendix C) and revisions of credits toward the City's RHNA. Math errors were corrected. • Revised sites inventory figures were prepared. • A discussion of the outreach to property owners in the Sites Inventory was added.

<p>projects to support the realistic capacity assumptions, and a map of the projects were added to Section 4, while detailed information about each project was added to a <i>new</i> Appendix E.</p> <ul style="list-style-type: none"> • Capacity assumptions for residentially designated sites was expanded. Programs were highlighted. • Capacity assumptions for commercially designated sites was added, including mixed use development on commercially designated sites. Programs were highlighted. • Capacity assumptions for the proposed Religious Institution Housing Overlay Zone (RIH-OZ) were expanded. • Examples to support the capacity assumptions for the RIH-OZ were added. • Criteria used to identify sites in the Sites Inventory was clarified. • Discussion of lot consolidation was added. • Information regarding the sites inventory strategy was expanded, including the HBCSP; Crenshaw Blvd. south of Sepulveda Blvd.; Redondo Beach Blvd.; and Sepulveda Blvd. were added. • Discussion regarding the Housing Corridor Study (HCS) was expanded. Conclusions from the Feasibility Study of 4 building prototypes and pro forma fiscal analysis that was prepared for the HCS between October 2021 and April 2022 were added. Sample renderings of prototypes/concepts were included. • An overview of the <i>Downtown Torrance Revitalization and Connectivity Plan</i> (Downtown Plan) that was adopted by the City Council in July 2021 was expanded, and key strategies and supporting future recommended actions to incentivize mixed use and residential development were added. • Information resulting from revisions to the Sites Inventory (see Appendix C below) was updated in Section 4. • Information regarding financial resources and the Housing Voucher (Section 8) program was added. • The section regarding administrative resources was expanded. • The section regarding opportunities for resource conservation was expanded. 	
<p>Section 5—Housing Plan:</p> <ul style="list-style-type: none"> • Several policies were added to address HCD and/or public input. • Many programs and objectives were expanded or added to address HCD and/or public input. 	<p>Section 5—Housing Plan:</p> <ul style="list-style-type: none"> • An error was corrected.

<ul style="list-style-type: none"> Time frames for objectives were revised consistent with AB 1398, which took effect January 1, 2022, and impacted the Housing Element update cycle for jurisdictions in the in the SCAG region. 	
<p>Appendix A—Outreach Efforts:</p> <ul style="list-style-type: none"> All the new noticing the City did, comment letters received, and summaries of additional outreach that occurred during this time period were added to Appendix A. The new information is preceded by a cover sheet titled “New Information, added April 2022.” 	<p>Appendix A—Outreach Efforts:</p> <ul style="list-style-type: none"> All the new noticing the City did, comment letters received, and summaries of additional outreach that occurred during this time period were added to Appendix A. The new information is preceded by a cover sheet titled “New Information, added May 6, 2022.”
<p>Appendix B—Review of Past Accomplishments:</p> <ul style="list-style-type: none"> Appendix B was updated to include other actions the City undertook during the 5th Cycle. 	<p>Appendix B—Review of Past Accomplishments:</p> <ul style="list-style-type: none"> No change.
<p>Appendix C—Sites Inventory:</p> <ul style="list-style-type: none"> The Sites Inventory table was expanded to include additional information for each site, including criteria for selection. The sites inventory was revised to delete certain sites that did not meet criteria and add new sites based on public interest and identification of additional opportunities based on HCD criteria. 	<p>Appendix C—Sites Inventory:</p> <ul style="list-style-type: none"> The Sites Inventory was revised to delete a site based on input from the property owner and to clarify an error that was made in the April 11, 2022 version of the document. Revised sites inventory figures were prepared.
<p>Appendix D—Affirmatively Furthering Fair Housing (AFFH):</p> <ul style="list-style-type: none"> Expanded evaluation of AFFH data per direction from HCD. Provided additional information regarding actions to affirmatively further fair housing (AFFH). A summary of fair housing issues was added. The expanded evaluation and additional information informed expansion of the Housing Plan via new programs and objectives. 	<p>Appendix D—Affirmatively Furthering Fair Housing (AFFH):</p> <ul style="list-style-type: none"> Data and figures were revised to reflect revisions to Sites inventory.
<p>Appendix E—Sampling of Entitled and Constructed Projects (NEW):</p> <ul style="list-style-type: none"> New appendix added; see discussion above in Section 4. 	<p>Appendix E—Sampling of Entitled and Constructed Projects</p> <ul style="list-style-type: none"> No change.
<p>Appendix F—Correspondence from Providers of Affordable Housing (NEW):</p> <ul style="list-style-type: none"> Letters received from providers of affordable housing in Torrance stating that they plan to remain affordable for the next 10 years. 	<p>Appendix F—Correspondence from Providers of Affordable Housing</p> <ul style="list-style-type: none"> No change.
<p>Appendix G—Response to Public Comments:</p> <ul style="list-style-type: none"> To be provided. 	<p>Appendix G—Response to Public Comments:</p> <ul style="list-style-type: none"> All public comments that were received were summarized in a table and each was responded to.