

The Boulevards at South Bay: Please see the prior review. The City is relying on The Boulevards at South Bay (The Boulevards) Specific Plan to accommodate its regional housing need, particularly for lower-income households. The element identifies acreage in The Boulevards by Assessor Parcel Number (APN). However, based on conversations with the City, the area has not been subdivided, parcel numbers do not reflect anticipated parcelization from the land-use map for the specific plan and as noted (page 64), the City anticipates adoption or establishment of 5 to 10 acre parcels. As a result, the element should also list acreage in The Boulevards by anticipated parcel sizes, unique reference and realistic capacity. This is particularly important because, as described in the prior review, several sites, as listed by APN, in The Boulevards are greater than 20 acres and the element was not revised with any analysis or programs to demonstrate how these large sites can facilitate the development of housing affordable to lower-income households. ✓

Realistic Capacity: The element now describes capacity calculations in the Carson Street and Sepulveda Boulevard mixed-use overlay areas assume 55 units per acre even though the maximum allowable density is 35 units per acre. While the City provides exception to allow 55 units per acre for projects with units designated for seniors or affordable to lower-income households, residential capacity estimates should not assume all identified sites will be developed as housing for seniors or affordable to lower-income households. Capacity estimates should be calculated according to allowable densities under the City's existing zoning (i.e., 35 units per acre).

For your information, pursuant to Government Code Section 65863, local governments must ensure the inventory of sites or any site programs accommodate the regional housing need throughout the planning period of the element. In addition, no local government action shall reduce, require or permit the reduction of, the residential density for any parcel to, or allow development of any parcel at, a lower residential density than identified in the site inventory or program unless the local government makes written findings, the reduction is consistent with the adopted General Plan, including the housing element and the remaining sites identified in it are adequate to accommodate the jurisdiction's share of the regional housing need.

As noted above, the element still does not include a complete site inventory or analysis and the adequacy of sites and zoning cannot be 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 and encourage a variety of housing types to accommodate the regional housing need. Programs to address a shortfall of sites must meet requirements pursuant to Government Code Sections 65583(a)(3) and 65583.2 (h) and (i) such as permit owner-occupied and rental multifamily uses by-right, without a conditional use permit (CUP), planned-unit development or other discretionary review or approval. Technical assistance can be found on the Department's *Building Blocks*' website at [http://www.hcd.ca.gov/hpd/housing\\_element2/PRO\\_adqsites.php#Program\\_Requirements](http://www.hcd.ca.gov/hpd/housing_element2/PRO_adqsites.php#Program_Requirements). ✓

