

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

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December 16, 2011

Mr. Gregg McClain
Acting Planning Director
Planning & Community Development
City of Hawthorne
4455 West 126th Street
Hawthorne, CA 90250

RE: Review of the City of Hawthorne's Revised Draft Housing Element

Dear Mr. McClain:

Thank you for submitting Hawthorne's revised draft housing element received for review on October 19, 2011. The Department is required to review draft housing elements and report the findings to the locality pursuant to Government Code Section 65585(b). A telephone conversation on December 5, 2011 with you and Ms. Veronica Tam of VTA, the City's consultant, facilitated the review.

The revised draft element addresses most of the statutory requirements described in the Department's April 30, 2010 review; however, revisions will still be necessary to comply with State housing element law (Article 10.6 of the Government Code).

1. *Include an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites (Section 65583(a)(3)). The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period (Section 65583.2).*

Suitability of Non-Vacant Sites: While the element was updated to include photographs and brief descriptions of the sites (e.g. "older single-family home, auto related business etc."), it must analyze the extent to which existing uses may impede development potential within the current planning period. The evaluation should consider development trends, market conditions and regulatory or other incentives or standards to encourage additional residential development on these sites. For sites with residential uses, the inventory could generally describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For non-residential sites, the inventory could generally describe whether the use is operating, marginal or discontinued, and the condition of the structure could describe any expressed interest in redevelopment. For example, the element does not describe how Site 28 (newer fast food restaurant), Site 19 (newer multifamily homes) and Site 135 (auto body shop) have a potential for redevelopment within the planning period. Refer to the sample analysis in the *Building Blocks* at http://www.hcd.ca.gov/hpd/housing_element2/SIA_zoning.php#nonvacant.

Lot Consolidation/Small Sites: The element was not revised to address this statutory requirement. For additional assistance, please see April 30, 2010 review.

2. *Identify adequate sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels, including rental housing, factory-built housing, mobilehomes, and emergency shelters and transitional housing. Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall provide for sufficient sites with zoning that permits owner-occupied and rental multifamily residential use by right, including density and development standards that could accommodate and facilitate the feasibility of housing for very low- and low-income households (Section 65583(c)(1)).*

As noted in Finding 1, the element does not include a complete site analysis to establish the adequacy of sites and zoning. 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. At a minimum, the element should be revised as follows:

Rezone Program for Adequate Sites: Pursuant to a telephone conversation with staff, the City completed a rezone in May 2011. While the element indicates the rezoned sites allow up to 30 units per acre pursuant to Government Code Section 65583.2 (h) and (i), the sites must also include minimum densities of 20 units per acre and permit multifamily uses by-right (without a conditional use permit, planned development permit or other discretionary action). For additional information and sample programs, see the *Building Blocks* at http://www.hcd.ca.gov/hpd/housing_element2/PRO_adqsites.php. Once these revisions have been completed Hawthorne's housing element will comply with statutory requirements of State housing element law.

The Department is committed to assist Hawthorne in addressing all statutory requirements of housing element law. If you have any questions or need additional technical assistance including a site visit, please contact James Johnson, of our staff, at (916) 323-7271.

Sincerely,



Glen A. Campora
Assistant Deputy Director

Enclosure

cc: Veronica Tam, VTA Associates